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: OP2017-047
Expiration Date: JUN 20 2022
Installation ID: 083-0001
Project Number: 2011-03-080

Installation Name and Address
Kansas City Power & Light Company
400 SW Highway P
Clinton, MO 64141
Henry County

Parent Company's Name and Address
Kansas City Power & Light Company
P.O. Box 418679
Kansas City MO, 64141

Installation Description:
Kansas City Power & Light - Montrose Generating Station is an electric energy generating station located in Clinton, Missouri. Equipment at the installation includes two coal-fired boilers, coal and fly ash handling equipment, emergency generators and fire pump, and storage tanks.

The installation is an existing major source of PM$_{10}$, PM$_{2.5}$, sulfur oxides (SO$_X$), nitrogen oxides (NO$_X$), volatile organic compounds (VOC), carbon monoxide (CO), hazardous air pollutants (HAP), and greenhouse gases. It is on the list of named installations therefore fugitive emissions are included in calculations of PTE for permitting purposes.

Prepared by
Jill Wade, P.E.
Operating Permit Unit

Kendall B. Hoke
Director or Designee
Department of Natural Resources
JUN 20 2017
Effective Date
Table of Contents

I. INSTALLATION EQUIPMENT LISTING .................................................................................................................. 4
   EMISSION UNITS WITH LIMITATIONS.................................................................................................................. 4
   EMISSION UNITS WITHOUT SPECIFIC LIMITATIONS.......................................................................................... 4

II. PLANT WIDE EMISSION LIMITATIONS............................................................................................................. 5

III. EMISSION UNIT SPECIFIC EMISSION LIMITATIONS ...................................................................................... 6
    PERMIT CONDITION 001...................................................................................................................................... 6
    10 CSR 10-6.060 Construction Permits Required............................................................................................... 6
    Construction Permit #0296-004, Issued January 22, 1996 ................................................................................. 6
    ROTARY COAL DUMPER AND CONVEYOR........................................................................................................ 6
    PERMIT CONDITION 002...................................................................................................................................... 7
    10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants............................................................... 7
    ROTARY COAL DUMPER AND CONVEYOR........................................................................................................ 7
    PERMIT CONDITION 003...................................................................................................................................... 8
    10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants............................................................... 8
    COAL TRANSFER AND CONVEYING AND FLY ASH SILO UNLOADING FROM TRUCKS............................. 8
    PERMIT CONDITION 004...................................................................................................................................... 9
    10 CSR 10-6.060 Construction Permits Required............................................................................................... 9
    Construction Permit #042012-003A, Issued July 13, 2012 .............................................................................. 9
    BOILERS............................................................................................................................................................... 9
    PERMIT CONDITION 005..................................................................................................................................... 11
    10 CSR 10-6.075, Maximum Achievable Control Technology Regulations......................................................... 11
    40 CFR Part 63 Subpart A – General Provisions ................................................................................................. 11
    BOILERS............................................................................................................................................................... 11
    PERMIT CONDITION 006..................................................................................................................................... 18
    10 CSR 10-6.260 Restriction of Emission of Sulfur Compounds ......................................................................... 18
    10 CSR 10-6.261 Control of Sulfur Dioxide Emissions ....................................................................................... 18
    BOILERS............................................................................................................................................................... 18
    PERMIT CONDITION 007..................................................................................................................................... 20
    10 CSR 10-6.270 Acid Rain Source Permits Required ......................................................................................... 20
    BOILERS............................................................................................................................................................... 20
    PERMIT CONDITION 008..................................................................................................................................... 21
    10 CSR 10-6.362, Clean Air Interstate Rule Annual NOx Trading Program ......................................................... 21
    10 CSR 10-6.364, Clean Air Interstate Rule Seasonal NOx Trading Program .................................................... 21
    10 CSR 10-6.366, Clean Air Interstate Rule SO2 Trading Program ...................................................................... 21
    BOILERS............................................................................................................................................................... 21
    PERMIT CONDITION 009..................................................................................................................................... 22
    40 CFR Parts 70 and 97 Cross State Air Pollution Rule ....................................................................................... 22
    10 CSR 10-6.372 Cross-State Air Pollution Rule Annual NOx Trading Allowance Allocations ......................... 22
    10 CSR 10-6.374 Cross-State Air Pollution Rule Ozone Season NOx Trading Allowance Allocations ............... 22
    10 CSR 10-6.376 Cross-State Air Pollution Rule Annual SO2 Trading Allowance Allocations .......................... 22
    BOILERS............................................................................................................................................................... 22
    PERMIT CONDITION 010..................................................................................................................................... 34
    10 CSR 10-6.075 Maximum Achievable Control Technology Regulations ....................................................... 34
    40 CFR Part 63 Subpart ZZZZZ National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines .................................................................................. 34
EMERGENCY ENGINES ................................................................. 34
PERMIT CONDITION 011 .......................................................... 37
10 CSR 10-6.070 New Source Performance Standards ...................... 37
40 CFR Part 60 Subpart III Standards of Performance for Stationary Compression Ignition Internal Combustion Engines .................................................................................................................. 37
EMERGENCY ENGINES ................................................................. 37
PERMIT CONDITION 012 .......................................................... 39
10 CSR 10-6.261 Control of Sulfur Dioxide Emissions ...................... 39
EMERGENCY ENGINES ................................................................. 39
PERMIT CONDITION 013 .......................................................... 41
10 CSR 10-6.260 Restriction of Emission of Sulfur Compounds .................. 41
EMERGENCY ENGINES ................................................................. 41

IV. CORE PERMIT REQUIREMENTS .............................................................................. 42
V. GENERAL PERMIT REQUIREMENTS ............................................................................. 47
VI. ATTACHMENTS ............................................................................................................. 53
ATTACHMENT A .................................................................................. 54
Fugitive Emission Observations ........................................................... 54
ATTACHMENT B .................................................................................. 55
Visible Emission Observations ............................................................ 55
ATTACHMENT C .................................................................................. 56
Method 9 Opacity Emissions Observations ............................................ 56
ATTACHMENT D .................................................................................. 57
Inspection/Maintenance/Repair/Malfunction Log .................................. 57
ATTACHMENT E .................................................................................. 58
Production and Emissions Record ......................................................... 58
ATTACHMENT F .................................................................................. 59
Acid Rain Permit ..................................................................................... 59
ATTACHMENT G .................................................................................. 67
I. Installation Equipment Listing

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.

<table>
<thead>
<tr>
<th>Emission Unit #</th>
<th>Description of Emission Unit</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP01</td>
<td>Rotary Coal Car Dumper and Conveyor</td>
</tr>
<tr>
<td>EP03</td>
<td>Coal Transfer and Conveying</td>
</tr>
<tr>
<td>EP07</td>
<td>Boiler #2</td>
</tr>
<tr>
<td>EP08</td>
<td>Boiler #3</td>
</tr>
<tr>
<td>EP09</td>
<td>Fly Ash Silo Unloading to Trucks</td>
</tr>
<tr>
<td>EP10</td>
<td>Fly Ash Silo Unloading to Trucks</td>
</tr>
<tr>
<td>EP11</td>
<td>Fly Ash Silo Unloading to Trucks</td>
</tr>
<tr>
<td>EP64</td>
<td>Emergency Generator</td>
</tr>
<tr>
<td>EP65</td>
<td>250 HP Emergency Generator</td>
</tr>
</tbody>
</table>

EMISSION UNITS WITHOUT SPECIFIC LIMITATIONS
The following list provides a description of the equipment that does not have unit specific limitations at
the time of permit issuance.

<table>
<thead>
<tr>
<th>Description of Emission Source</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP02</td>
</tr>
<tr>
<td>EP05</td>
</tr>
<tr>
<td>EP12</td>
</tr>
<tr>
<td>EP13</td>
</tr>
<tr>
<td>EP14</td>
</tr>
<tr>
<td>EP15</td>
</tr>
<tr>
<td>EP16</td>
</tr>
<tr>
<td>EP18</td>
</tr>
<tr>
<td>EP48</td>
</tr>
<tr>
<td>EP202, EP203</td>
</tr>
<tr>
<td>EP206</td>
</tr>
<tr>
<td>EP207</td>
</tr>
<tr>
<td>EP208</td>
</tr>
<tr>
<td>EP209</td>
</tr>
<tr>
<td>EP210</td>
</tr>
<tr>
<td>EP214</td>
</tr>
<tr>
<td>EP221</td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td></td>
</tr>
</tbody>
</table>
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. The plant wide conditions apply to all emission units at this installation. All emission units are listed in Section I under Emission Units with Limitations and Emission Units without Limitations.

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.

<table>
<thead>
<tr>
<th>PERMIT CONDITION 001</th>
</tr>
</thead>
<tbody>
<tr>
<td>10 CSR 10-6.060 Construction Permits Required</td>
</tr>
<tr>
<td>Construction Permit #0296-004, Issued January 22, 1996</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Rotary Coal Dumper and Conveyor</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Unit</td>
</tr>
<tr>
<td>EP01</td>
</tr>
</tbody>
</table>

**Emission Limitation**

1) The permittee shall not emit more than 14.9 tons of particulate matter less than ten microns (PM$_{10}$) from the coal receiving, conveying and stacking operations during any consecutive 12-month period. [Special Condition #1]

**Monitoring/Recordkeeping**

1) The permittee shall determine compliance with Emission Limitation (1) at the end of each calendar month by adding the coal received from the current month to the coal received from the previous consecutive eleven (11) months and calculating PM$_{10}$ emissions using the form provided (see Attachment E) or equivalent. [Special Condition #2]

2) The permittee shall maintain all records on-site for five years and make such records available to Department of Natural Resources personnel upon request. [Special Condition #3]

**Reporting**

1) The permittee shall report to the Air Pollution Control Program Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 no later than ten days after the end of the month, if the 12-month cumulative total (Condition 3) records show that the source exceeded the limitation of Condition 1 (14.9 tons PM$_{10}$). [Special Condition #4]

2) The permittee shall report any deviations from the requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V of this permit.
PERMIT CONDITION 002
10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Description</th>
<th>Manufacturer/Model #</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP01</td>
<td>Rotary coal car dumper and conveying coal from rotary car dumper to storage piles; MHDR 3000 ton/hr; installed 1996</td>
<td>Heyl &amp; Patterson, Inc</td>
</tr>
</tbody>
</table>

Emission Limitations

1) The permittee shall not cause or permit emissions to be discharged into the atmosphere from any source any visible emissions with opacity greater than 20%.
2) Exception: The permittee 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%.

Monitoring

1) The permittee shall conduct opacity readings on each emission unit using the procedures contained in USEPA Test Method 22. The permittee is only required to take readings when the emission unit is operating and when the weather conditions allow. If the permittee observes no visible or other significant emissions using these procedures, then no further observations are 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 permittee must maintain the following monitoring schedule:
   a) The permittee shall conduct weekly observations for a minimum of eight (8) consecutive weeks after permit issuance.
   b) Should the permittee observe no violations of this regulation during this period then-
      i) The permittee may observe once every two (2) weeks for a period of eight (8) weeks.
      ii) If a violation is noted, monitoring reverts to weekly.
      iii) Should no violation of this regulation be observed during this period then-
           (1) The permittee may observe once per month.
           (2) If a violation is noted, monitoring reverts to weekly.
3) If the permittee, upon the issuance date of this renewal permit, has already progressed to conducting observations once every two weeks or once per month, the permittee may continue from that point forward in the established monitoring schedule; however, if a violation is noted the permittee shall revert back to weekly monitoring.
4) 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 using Attachment B (or its equivalent), 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;
   c) Whether the visible emissions were normal for the process;
2) The permittee shall maintain records of any equipment malfunctions, which may contribute to visible emissions (see Attachment D); and,
3) The permittee shall maintain records of all USEPA Method 9 (see Attachment C) opacity tests performed.

**Reporting**
1) The permittee shall notify the Air Pollution Control Program Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after an exceedance or a malfunction which has caused an exceedance of the emission limitations.
2) The permittee shall report any deviations from the requirements of this permit condition in the semi-annual monitoring report and compliance certification required by Section V of this permit.

---

**PERMIT CONDITION 003**

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

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Description</th>
<th>Manufacturer/Model #</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP03</td>
<td>Conveyor belt system for transferring coal; MHDR 600 ton/hr; installed 1958</td>
<td>United Conveyor Corp.</td>
</tr>
<tr>
<td>EP09, EP10, and EP11</td>
<td>Three places where fly ash is unloaded from silos to either enclosed or open bed trucks using telescoping arms; installed circa 1958</td>
<td>NA</td>
</tr>
</tbody>
</table>

**Emission Limitations**
1) The permittee shall not cause or permit emissions to be discharged into the atmosphere from any source any visible emissions with opacity greater than 40%.
2) Exception: The permittee 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%.

**Monitoring**
1) The permittee shall conduct opacity readings on each emission unit using the procedures contained in USEPA Test Method 22. The permittee is only required to take readings when the emission unit is operating and when the weather conditions allow. If the permittee observes no visible or other significant emissions using these procedures, then no further observations are 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 permittee must maintain the following monitoring schedule:
   a) The permittee shall conduct weekly observations for a minimum of eight (8) consecutive weeks after permit issuance.
   b) Should the permittee observe no violations of this regulation during this period then-
      i) The permittee may observe once every two (2) weeks for a period of eight (8) weeks.
      ii) If a violation is noted, monitoring reverts to weekly.
      iii) Should no violation of this regulation be observed during this period then-
(1) The permittee may observe once per month.
(2) If a violation is noted, monitoring reverts to weekly.

3) If at the time of this operating permit issuance the permittee has already progressed to conducting observations once every two weeks or once per month, the permittee may continue from that point forward in the established monitoring schedule; however, if a violation is noted the permittee shall revert back to weekly monitoring.

4) 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 using Attachment B (or its equivalent), 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;
   c) Whether the visible emissions were normal for the process;

2) The permittee shall maintain records of any equipment malfunctions, which may contribute to visible emissions (see Attachment D); and,

3) The permittee shall maintain records of all USEPA Method 9 (see Attachment C) opacity tests performed.

**Reporting**

1) The permittee shall notify the Air Pollution Control Program Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after an exceedance or a malfunction which has caused an exceedance of the emission limitations.

2) The permittee shall report any deviations from the requirements of this permit condition in the semi-annual monitoring report and compliance certification required by Section V of this permit.

---

**PERMIT CONDITION 004**

10 CSR 10-6.060 Construction Permits Required
Construction Permit #042012-003A, Issued July 13, 2012

<table>
<thead>
<tr>
<th>Boilers</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Emission Unit</strong></td>
</tr>
<tr>
<td>EP07</td>
</tr>
<tr>
<td>EP08</td>
</tr>
</tbody>
</table>
**Emission Limitation**

1) The permittee shall not emit more than 0.25 pounds of carbon monoxide (CO) per million British thermal unit (lb/MMBtu) of heat input from Unit 2 (EP07) and Unit 3 (EP08) each, based on a 30-day rolling average. This limit is exclusive of emissions occurring during start-up, shutdown, and malfunction. [Special Condition #2A]

2) The permittee shall not emit more than 2,332.35 tons of CO from Unit 2 and 2,463.75 tons of CO from Unit 3 in any consecutive 12-month period. This limit is inclusive of emissions during start-up, shutdown, and malfunction. [Special Condition #2B]

**Operational Limitation**

1) The permittee shall operate one CO continuous emission monitor systems (CEMS) on combined Unit 2 and Unit 3 to determine compliance with the emission limitations. [Special Condition #2C]

2) The permittee shall install, certify, operate, calibrate, test and maintain CEMS for CO and any necessary auxiliary monitoring equipment in accordance with all applicable regulations. If there are conflicting regulatory requirements, the more stringent shall apply. [Special Condition #3A]

3) CEMS certification shall be made pursuant to 40 CFR Part 60, Appendix B, Performance Specification 4. [Special Condition #3B]

4) Periodic quality assurance assessments shall be conducted according to the procedures outlined in 40 CFR Part 60, Appendix F. [Special Condition #3C]

5) The permittee shall install and operate a data acquisition and handling system to calculate emissions in units of Emission Limitations (1) and (2). [Special Condition #3D]

**Recordkeeping**

The permittee shall maintain all records required by this permit for not less than five years and shall make them available to any Missouri Department of Natural Resources’ personnel upon request. [Special Condition #4]

**Reporting**

1) The permittee shall report CO emissions in the semi-annual monitoring (SAM) report and in the annual compliance certification (ACC). [Special Condition #5A]

   a) Demonstration of compliance for the lb/MMBtu 30-day rolling average limit in Emission Limitation (1) shall be based upon daily average emissions.

   b) Demonstration of compliance for the 12-month CO limits in Emission Limitation (2) shall be based upon the summation of the individual 1-hour CEMS data, respectively.

   c) The permittee shall electronically submit all Relative Accuracy Test Audit (RATA), quality assurance, and quality control reports used to demonstrate compliance with Emission Limitations (1) and (2) with the current SAM and ACC for the 3-year period beginning with commencement of operations under this permit. After the 3-year period, the reports shall be kept on site.

2) The permittee shall report to the Air Pollution Control Program Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the end of the month during which any record required by this permit shows an exceedance of a limitation imposed by this permit. [Special Condition #5B]

3) The permittee shall report any deviations from the requirements of this permit condition in the semi-annual monitoring report and compliance certification required by Section V of this permit.
**PERMIT CONDITION 005**

10 CSR 10-6.075, Maximum Achievable Control Technology Regulations

<table>
<thead>
<tr>
<th>Boilers</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Emission Unit</strong></td>
</tr>
<tr>
<td>EP07</td>
</tr>
<tr>
<td>EP08</td>
</tr>
</tbody>
</table>

**Applicability**

EP07 Boiler 2 and EP08 Boiler 3 meet the definition of a coal-fired electric utility steam generating unit (EGU) within §63.10042. The boilers were constructed in 1960 and 1964 respectively, classifying them as existing coal-fired EGU and affected sources per §63.9982(a)(1). The boilers combust coal with a heat content in excess of 8,300 Btu/lb meeting the subcategory of non-low rank virgin coal in §63.9990(a)(1).

**Compliance Dates**

The permittee shall meet the notification requirements in §63.10030 according to the schedule in §63.10030 and in 40 CFR Part 63, Subpart A. Some of the notifications must be submitted before the permittee is required to comply with the emission limits and work practice standards in this subpart. [§63.9984(c)]

**Emission Limitations and Work Practice Standards**

1) The permittee shall meet the following requirements at all times: [§63.9991(a)]
   a) The permittee shall meet each emission limit and work practice standard in Tables 2 and 3 of this subpart that applies, except as provided under §63.10009. [§63.9991(a)(1)]
   b) The permittee shall meet each operating limit in Table 4 of this subpart that applies. [§63.9991(a)(2)]

2) As provided in §63.6(g), the Director may approve use of an alternative to the work practice standards in this section. [§63.9991(b)]

3) The permittee may use the alternate SO₂ limit in Table 2 of this subpart only if the EGU: [§63.9991(c)]
   a) Has a system using wet or dry flue gas desulfurization technology and SO₂ continuous emissions monitoring system (CEMS) installed on the unit; and [§63.9991(c)(1)]
b) At all times, the permittee operates the wet or dry flue gas desulfurization technology installed on the unit consistent with §63.10000(b). [§63.9991(c)(2)]

**40 CFR Part 63, Subpart UUUUU Table 2 - Emission Limits for Existing EGUs**

[As stated in § 63.9991, the permittee shall comply with the following applicable emission limits]

<table>
<thead>
<tr>
<th>Pollutants (a, b, and c)</th>
<th>Emission Limit</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. Filterable particular matter (PM)</td>
<td>0.030 lb/MMBtu or 0.30 lb/MWh</td>
</tr>
<tr>
<td><strong>AND</strong></td>
<td></td>
</tr>
<tr>
<td>b. Hydrogen Chloride (HCl)</td>
<td>0.0020 lb/MMBtu or 0.020 lb/MWh</td>
</tr>
<tr>
<td><strong>AND</strong></td>
<td></td>
</tr>
<tr>
<td>c. Mercury (Hg)</td>
<td>1.2 lb/TBtu or 0.013 lb/GWh</td>
</tr>
</tbody>
</table>

1 For low emitting EGU (LEE) emissions testing for total PM, total HAP metals, individual HAP metals, and HCl, the required minimum sampling volume shall be increased nominally by a factor of two.
2 Gross electric output.
3 The permittee may not use the alternate SO2 limit if the EGU does not have some form of FGD system and SO2 CEMS installed.

**40 CFR Part 63, Subpart UUUUU Table 3 – Work Practice Standards**

[As stated in § 63.9991, the permittee shall comply with the following applicable work practice standards]

<table>
<thead>
<tr>
<th>If your EGU is . . .</th>
<th>You must meet the following . . .</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. An existing EGU</td>
<td>Conduct a tune-up of the EGU burner and combustion controls at least each 36 calendar months, or each 48 calendar months if neural network combustion optimization software is employed, as specified in §63.10021(e).</td>
</tr>
</tbody>
</table>

2 A coal-fired, liquid oil-fired (excluding limited-use liquid oil-fired subcategory units), or solid oil-derived fuel-fired EGU during startup

   a. You have the option of complying using either of the following work practice standards:
      (1) If you choose to comply using paragraph (1) of the definition of “startup” in §63.10042, you must operate all CMS during startup. Startup means either the first-ever firing of fuel in a boiler for the purpose of producing electricity, or the firing of fuel in a boiler after a shutdown event for any purpose. Startup ends when any of the steam from the boiler is used to generate electricity for sale over the grid or for any other purpose (including on site use). For startup of a unit, you must use clean fuels as defined in §63.10042 for ignition. Once you convert to firing coal, residual oil, or solid oil-derived fuel, you must engage all of the applicable control technologies except dry scrubber and SCR. You must start your dry scrubber and SCR systems, if present, appropriately to comply with relevant standards applicable during normal operation. You must comply with all applicable emissions limits at all times except for periods that meet the applicable definitions of startup and shutdown in this subpart. You must keep records during startup periods. You must provide reports concerning activities and startup periods, as specified in §63.10011(g) and §63.10021(h) and (i).
      (2) If you choose to comply using paragraph (2) of the definition of “startup” in §63.10042, you must operate all CMS during startup. You must also collect appropriate data, and you must calculate the pollutant emission rate for each hour of startup.

For startup of an EGU, you must use one or a combination of the clean fuels defined in §63.10042 to the maximum extent possible, taking into account considerations such as boiler or control device integrity, throughout the startup period. You must have sufficient clean fuel capacity to engage and operate your PM control device within one hour of adding coal, residual oil, or solid oil-derived fuel to the unit. You must meet the startup period work practice requirements as identified in §63.10020(c).

Once you start firing coal, residual oil, or solid oil-derived fuel, you must vent emissions to the main stack(s). You must comply with the applicable emission limits beginning with the hour after startup ends. You must engage and operate your particulate matter control(s) within 1 hour of first firing of coal, residual oil, or solid oil-derived fuel.
You must start all other applicable control devices as expeditiously as possible, considering safety and manufacturer/supplier recommendations, but, in any case, when necessary to comply with other standards made applicable to the EGU by a permit limit or a rule other than this Subpart that require operation of the control devices.

b. Relative to the syngas not fired in the combustion turbine of an IGCC EGU during startup, you must either: (1) Flare the syngas, or (2) route the syngas to duct burners, which may need to be installed, and route the flue gas from the duct burners to the heat recovery steam generator.

c. If you choose to use just one set of sorbent traps to demonstrate compliance with the applicable Hg emission limit, you must comply with the limit at all times; otherwise, you must comply with the applicable emission limit at all times except for startup and shutdown periods.

d. You must collect monitoring data during startup periods, as specified in §63.10020(a) and (e). You must keep records during startup periods, as provided in §§63.10032 and 63.10021(h). You must provide reports concerning activities and startup periods, as specified in §§63.10011(g), 63.10021(i), and 63.10031.

4. A coal-fired, liquid oil-fired (excluding limited-use liquid oil-fired subcategory units), or solid oil-derived fuel-fired EGU during shutdown

You must operate all CMS during shutdown. You must also collect appropriate data, and you must calculate the pollutant emission rate for each hour of shutdown for those pollutants for which a CMS is used.

While firing coal, residual oil, or solid oil-derived fuel during shutdown, you must vent emissions to the main stack(s) and operate all applicable control devices and continue to operate those control devices after the cessation of coal, residual oil, or solid oil-derived fuel being fed into the EGU and for as long as possible thereafter considering operational and safety concerns. In any case, you must operate your controls when necessary to comply with other standards made applicable to the EGU by a permit limit or a rule other than this Subpart and that require operation of the control devices.

If, in addition to the fuel used prior to initiation of shutdown, another fuel must be used to support the shutdown process, that additional fuel must be one or a combination of the clean fuels defined in §63.10042 and must be used to the maximum extent possible, taking into account considerations such as not compromising boiler or control device integrity.

Relative to the syngas not fired in the combustion turbine of an IGCC EGU during shutdown, you must either: (1) Flare the syngas, or (2) route the syngas to duct burners, which may need to be installed, and route the flue gas from the duct burners to the heat recovery steam generator.

You must comply with all applicable emission limits at all times except during startup periods and shutdown periods at which time you must meet this work practice. You must collect monitoring data during shutdown periods, as specified in §63.10020(a). You must keep records during shutdown periods, as provided in §§63.10032 and 63.10021(h). Any fraction of an hour in which shutdown occurs constitutes a full hour of shutdown. You must provide reports concerning activities and shutdown periods, as specified in §§63.10011(g), 63.10021(i), and 63.10031.
40 CFR Part 63, Subpart UUUUU Table 4 - Operating Limits for Existing EGUs
[As stated in § 63.9991, the permittee shall comply with the following applicable operating limits]

<table>
<thead>
<tr>
<th>Method of Compliance</th>
<th>Operating Limits</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM CPMS</td>
<td>Maintain the 30-boiler operating day rolling average particulate matter continuous parametric monitoring system (PM CPMS) output at or below the highest 1-hour average measured during the most recent performance test demonstrating compliance with the filterable PM, total non-mercury HAP metals, individual non-mercury HAP metals emissions limitation(s).</td>
</tr>
</tbody>
</table>

**General Requirements**

1) The permittee shall be in compliance with the emission limits and operating limits in this subpart. These limits apply at all times except during periods of startup and shutdown; however, for coal-fired EGUs, the permittee is required to meet the work practice requirements in Table 3 of this subpart during periods of startup or shutdown. [§63.10000(a)]

2) At all times the permittee shall operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the EPA Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. [§63.10000(b)]

3) If the permittee demonstrates compliance with any applicable emissions limit through use of a continuous monitoring system (CMS), where a CMS includes a continuous parameter monitoring system (CPMS) as well as a continuous emissions monitoring system (CEMS), the permittee shall develop a site-specific monitoring plan and submit this site-specific monitoring plan, if requested, at least 60 days before the initial performance evaluation (where applicable) of the CMS. This requirement also applies if the permittee petitions the director for alternative monitoring parameters under §63.8(f). This requirement to develop and submit a site-specific monitoring plan does not apply to affected sources with existing monitoring plans that apply to CEMS and CPMS prepared under Appendix B to 40 CFR Part 60 or 75, and that meet the requirements of §63.10010. Using the process described in §63.8(f)(4), the permittee may request approval of monitoring system quality assurance and quality control procedures alternative to those specified and, if approved, include those in the site-specific monitoring plan. The monitoring plan shall address all of the following provisions: [§63.10000(d)(1)]

a) The site-specific monitoring plan shall include the information specified in §63.10000(d)(5)(i) through (vii). Alternatively, the requirements of §63.10000(d)(5)(i) through (vii) as shown in d) below are considered to be met for a particular CMS or sorbent trap monitoring system if: [§63.10000(d)(2)]

   i) The CMS or sorbent trap monitoring system is installed, certified, maintained, operated, and quality-assured either according to 40 CFR Part 75, or Appendix A or B of this subpart; and [§63.10000(d)(2)(i)]

   ii) The recordkeeping and reporting requirements of 40 CFR Part 75, or Appendix A or B of this subpart, that pertain to the CMS are met. [§63.10000(d)(2)(ii)]

b) If requested by the Director, the permittee shall submit the monitoring plan (or relevant portion of the plan) at least 60 days before the initial performance evaluation of a particular CMS, except where the CMS has already undergone a performance evaluation that meets the requirements of §63.10010 (e.g., if the CMS was previously certified under another program). [§63.10000(d)(3)]
c) The permittee shall operate and maintain the CMS according to the site-specific monitoring plan. 
   [§63.10000(d)(4)]

d) The provisions of the site-specific monitoring plan shall address the following items:
   [§63.10000(d)(5)]
   i) Installation of the CEMS or sorbent trap monitoring system sampling probe or other
      interface at a measurement location relative to each affected process unit such that the
      measurement is representative of control of the exhaust emissions (e.g., on or downstream
      of the last control device). See §63.10010(a) for further details. For PM CPMS installations,
      follow the procedures in §63.10010(h). [§63.10000(d)(5)(i)]
   ii) Performance and equipment specifications for the sample interface, the pollutant
       concentration or parametric signal analyzer, and the data collection and reduction systems.
       [§63.10000(d)(5)(ii)]
   iii) Schedule for conducting initial and periodic performance evaluations. [§63.10000(d)(5)(iii)]
   iv) Performance evaluation procedures and acceptance criteria (e.g., calibrations), including the
       quality control program in accordance with the general requirements of §63.8(d).
       [§63.10000(d)(5)(iv)]
   v) On-going operation and maintenance procedures, in accordance with the general
      requirements of §63.8(c)(1)(ii), (3), and (4)(ii). [§63.10000(d)(5)(v)]
   vi) Conditions that define a CMS that is out of control consistent with §63.8(c)(7)(i) and for
       responding to out of control periods consistent with §63.8(c)(7)(ii) and (8).
       [§63.10000(d)(5)(vi)]
   vii) On-going recordkeeping and reporting procedures, in accordance with the general
       requirements of §63.10(c), (e)(1), and (e)(2)(i), or as specifically required by this subpart.
       [§63.10000(d)(5)(vii)]

5) As part of the demonstration of continuous compliance, the permittee shall perform periodic tune-
ups of the EGU(s), according to §63.10021(e). [§63.10000(e)]

**Testing and Initial Compliance**

4) Low emitting EGUs. The provisions of §63.10005(h) as shown in a) through c) below apply to all
pollutants with emissions limits from existing EGUs. The permittee may not pursue this compliance
option if the existing EGU is equipped with an acid gas scrubber and has a main stack and bypass
stack exhaust configuration. [§63.10005(h)]

a) An EGU may qualify for low emitting EGU (LEE) status for Hg, HCl, filterable PM, total non-
Hg HAP metals, or individual non-Hg HAP metals if the permittee collects performance test data
that meet the requirements of §63.10005(h), and if those data demonstrate: [§63.10005(h)(1)]
   i) For all pollutants except Hg, performance test emissions results less than 50 percent of the
      applicable emissions limits in Table 2 to this subpart for all required testing for three
      consecutive years; or [§63.10005(h)(1)(i)]
   ii) For Hg emissions from an existing EGU, either: [§63.10005(h)(1)(ii)]
      (1) Average emissions less than ten percent of the applicable Hg emissions limit in Table 2
to this subpart (expressed either in units of lb/TBtu or lb/GWh); or
       [§63.10005(h)(1)(ii)(A)]
      (2) Potential Hg mass emissions of 29.0 or fewer pounds per year and compliance with the
       applicable Hg emission limit in Table 2 to this subpart (expressed either in units of
       lb/TBtu or lb/GWh). [§63.10005(h)(1)(ii)(B)]

b) For all pollutants except Hg, the permittee shall conduct all required performance tests described
in §63.10007 to demonstrate that a unit qualifies for LEE status. [§63.10005(h)(2)]
When conducting emissions testing to demonstrate LEE status, the permittee shall increase the minimum sample volume specified in Table 2 nominally by a factor of two.  

\[ §63.10005(h)(2)(i) \]

The permittee shall follow the instructions in §63.10007(e) and Table 5 to this subpart to convert the test data to the units of the applicable standard.  

\[ §63.10005(h)(2)(ii) \]

c) For Hg, the permittee shall conduct a 30-boiler operating day performance test using Method 30B in Appendix A–8 to 40 CFR Part 60 to determine whether a unit qualifies for LEE status. Locate the Method 30B sampling probe tip at a point within the ten percent centroidal area of the duct at a location that meets Method 1 in Appendix A–1 to 40 CFR Part 60 and conduct at least three nominally equal length test runs over the 30-boiler operating day test period. Collect Hg emissions data continuously over the entire test period (except when changing sorbent traps or performing required reference method QA procedures), under all process operating conditions. The permittee may use a pair of sorbent traps to sample the stack gas for no more than ten days.  

\[ §63.10005(h)(3) \]

i) Depending on whether the permittee intends to assess LEE status for Hg in terms of the lb/TBtu or lb/GWh emission limit in Table 2 to this subpart or in terms of the annual Hg mass emissions limit of 29.0 lb/year, the permittee shall collect some or all of the following data during the 30-boiler operating day test period (see §63.10005(h)(3)(iii)):  

\[ §63.10005(h)(3)(i) \]

(1) Diluent gas (CO2 or O2) data, using either Method 3A in Appendix A–3 to 40 CFR Part 60 or a diluent gas monitor that has been certified according to 40 CFR Part 75.  

\[ §63.10005(h)(3)(i)(A) \]

(2) Stack gas flow rate data, using either Method 2, 2F, or 2G in Appendices A–1 and A–2 to 40 CFR Part 60, or a flow rate monitor that has been certified according to 40 CFR Part 75.  

\[ §63.10005(h)(3)(i)(B) \]

(3) Stack gas moisture content data, using either Method 4 in Appendix A–1 to 40 CFR Part 60, or a moisture monitoring system that has been certified according to 40 CFR Part 75. Alternatively, an appropriate fuel-specific default moisture value from §75.11(b) may be used in the calculations.  

\[ §63.10005(h)(3)(i)(C) \]

(4) Hourly electrical load data (MW), from facility records.  

\[ §63.10005(h)(3)(i)(D) \]

ii) If the permittee uses CEMS to measure CO2 (or O2) concentration, and/or flow rate, and/or moisture, the permittee shall record hourly average values of each parameter throughout the 30-boiler operating day test period. If the permittee opts to use EPA reference methods rather than CEMS for any parameter, the permittee shall perform at least one representative test run on each operating day of the test period, using the applicable reference method.  

\[ §63.10005(h)(3)(ii) \]

iii) The permittee shall calculate the average Hg concentration, in µg/m3 (dry basis), for the 30-boiler operating day performance test, as the arithmetic average of all Method 30B sorbent trap results. The permittee shall also calculate, as applicable, the average values of CO2 or O2 concentration, stack gas flow rate, stack gas moisture content, and electrical load for the test period. Then the permittee shall perform the following:  

\[ §63.10005(h)(3)(iii) \]

(1) To express the test results in units of lb/TBtu, follow the procedures in §63.10007(e). Use the average Hg concentration and diluent gas values in the calculations.  

\[ §63.10005(h)(3)(iii)(A) \]

(2) To express the test results in units of lb/GWh, use Equations A–3 and A–4 in §6.2.2 of Appendix A to this subpart, replacing the hourly values “Ch”, “Qh”, “Bws” and “(MW)h”
with the average values of these parameters from the performance test. 

[§63.10005(h)(3)(iii)(B)]

(3) To calculate pounds of Hg per year, use one of the following methods:

[§63.10005(h)(3)(iii)(C)]

(a) Multiply the average lb/ TBtu Hg emission rate (determined according to §63.10005(h)(3)(iii)(A)) by the maximum potential annual heat input to the unit (TBtu), which is equal to the maximum rated unit heat input (TBtu/hr) times 8,760 hours. If the maximum rated heat input value is expressed in units of MMBtu/hr, multiply it by $10^{-6}$ to convert it to TBtu/hr; or [§63.10005(h)(3)(iii)(C)(I)]

(b) Multiply the average lb/GWh Hg emission rate (determined according to §63.10005(h)(3)(iii)(B)) by the maximum potential annual electricity generation (GWh), which is equal to the maximum rated electrical output of the unit (GW) times 8,760 hours. If the maximum rated electrical output value is expressed in units of MW, multiply it by $10^{-3}$ to convert it to GW; or [§63.10005(h)(3)(iii)(C)(2)]

7) Startup and shutdown for coal-fired units. The permittee shall follow the requirements given in Table 3 to this subpart. [§63.10005(j)]

8) The permittee shall conduct subsequent performance tune-ups as specified in §63.10006.

9) The permittee shall conduct all required performance tests as specified in §63.10007, Table 5 to 40 CFR Part 63, Subpart UUUUU, and Table 6 to 40 CFR Part 63, Subpart UUUUU.

10) The permittee may use emissions averaging as an alternative to meeting requirements as specified in §63.10009.

11) The permittee shall comply with applicable monitoring, installation, operation and maintenance requirements as specified in §63.10010.

12) The permittee shall demonstrate initial compliance with applicable emissions limits as specified in §63.10011.

Continuous Compliance

1) The permittee shall monitor and collect data to demonstrate continuous compliance as specified in §63.10020.

2) The permittee shall demonstrate continuous compliance with emission limitations, operating limitations and work practice standards as specified in §63.10021 and Table 7 to 40 CFR Part 63, Subpart UUUUU.

3) The permittee shall demonstrate continuous compliance under the emissions averaging provisions as specified in §63.10022.

4) The permittee shall establish PM CPMS operating limit and determine compliance as specified in §63.10023.

Notifications and General Provisions

1) The permittee shall submit notifications as specified in §63.10030

2) The permittee shall comply with the applicable General Provisions in §63.1 through 63.15 according to Table 9 to 40 CFR Part 63, Subpart UUUUU

Recordkeeping

1) The permittee shall maintain applicable records as specified in §63.10031 and §63.10033.

2) Records may be kept in either written or electronic form.

3) These records shall be made available for inspection to Department of Natural Resources’ personnel upon request.
4) All records shall be retained for five years.

**Reporting**

1) Permittee shall submit applicable reports as specified in §63.10031 and Table 8 to 40 CFR Part 63, Subpart UUUUU.

2) The permittee shall notify the Air Pollution Control Program Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after an exceedance or a malfunction which has caused an exceedance of the emission limitations.

3) The permittee shall report any deviations from the standards, compliance provisions, performance testing, test methods, recordkeeping, and reporting requirements of this permit condition in the semiannual monitoring report and compliance certification required by Section V of this permit.

---

**PERMIT CONDITION 006**

10 CSR 10-6.260 Restriction of Emission of Sulfur Compounds
10 CSR 10-6.261 Control of Sulfur Dioxide Emissions

<table>
<thead>
<tr>
<th>Boilers</th>
<th>Description</th>
<th>Manufacturer/ Model #</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>EP07</strong></td>
<td>Boiler #2, dry bottom, tangential-fired boiler; primary fuel - coal; start-up fuel - #2 fuel oil, petroleum coke, supplemental fuel – clean biomass such as switch grass; MHDR 2130 MMBtu/hr; equipped with dedicated electrostatic precipitator (ESP) to control PM; exhausts to common stack with EP08; installed 1960</td>
<td>Combustion Engineering</td>
</tr>
<tr>
<td><strong>EP08</strong></td>
<td>Boiler #3, dry bottom, tangential-fired boiler; primary fuel - coal; start-up fuel - #2 fuel oil, petroleum coke, supplemental fuel – clean biomass such as switch grass; MHDR 2250 MMBtu/hr; equipped with dedicated electrostatic precipitator (ESP) to control PM; exhausts to common stack with EP07; installed 1964</td>
<td>Combustion Engineering</td>
</tr>
</tbody>
</table>

**Emission Limitation**
The permittee shall limit the average sulfur dioxide (SO₂) emissions per million Btus actual heat input into the atmosphere to 3.9 pounds (24-hour average).

**Monitoring**

1. The permittee shall maintain and operate a continuous emission monitoring system (CEMS) in accordance with all the requirements of 40 CFR Part 75 to monitor SO₂ emissions. Results shall be recorded on an automated Data Acquisition Handling System (DAHS).

2. The permittee shall ensure that each CEMS meets the equipment, installation, and performance specifications in Appendix A to 40 CFR Part 75; and is maintained according to the quality assurance and quality control procedures in Appendix B to 40 CFR Part 75.

3. The permittee shall ensure that all CEMS are in operation and monitoring unit emissions at all times that the affected unit, EP07 and EP08, combusts any fuel except during periods of calibration,
quality assurance, or preventative maintenance, as well as, periods of repair, periods of backups of data from the DAHS or recertification.

4. The permittee shall ensure that each CEMS is capable of completing a minimum of one cycle of operation (sampling, analyzing, and data recording) for each successive 15-minute interval. The permittee shall reduce all SO₂ emissions data to hourly averages. Hourly averages shall be computed using at least one data point in each fifteen minute quadrant of an hour, where the unit combusted fuel during that quadrant of an hour. Notwithstanding this requirement, an hourly average may be computed from at least two data points separated by a minimum of 15 minutes (where the unit operates for more than one quadrant of an hour) if data are unavailable as a result of the performance of calibration, quality assurance, or preventive maintenance, or backups of data from the DAHS, or recertification. The permittee shall use all valid measurements or data points collected during an hour to calculate the hourly averages. All data points collected during an hour shall be, to the extent practicable, evenly spaced over the hour.

5. The permittee shall prepare and maintain a monitoring plan in accordance with §75.53. A monitoring plan shall contain sufficient information on the CEMS to demonstrate that all unit SO₂ emissions are monitored and reported.

6. Whenever the permittee makes a replacement, modification, or change in the certified CEMS, including a change in the automated DAHS or in the flue gas handling system, that affects information reported in the monitoring, then the permittee shall update the monitoring plan, by the applicable deadline specified in §75.62.

Recordkeeping
1. The permittee shall maintain a file on-site of all measurements, data, reports, and other information required by §75.53, §75.57 and §75.59. Records include the following:
   a) Total fuel consumed during the control period;
   b) The total heat input for each emissions unit during the control period;
   c) Reports of all stack testing conducted;
   d) All other data collected by a CEMS necessary to convert the monitoring data to the units of the applicable emission limitation;
   e) All performance evaluations conducted in the past year;
   f) All monitoring device calibration checks;
   g) All monitoring system, monitoring device and performance testing measurements;
   h) Records of adjustments and maintenance performed on monitoring systems and devices; and
   i) A log identifying each period during which the CEMS or alternate procedure was inoperative, except for zero and span checks, and the nature of the repairs and adjustments performed to make the system operative.

2. All records shall be kept in a form suitable for inspection for at least five years and be made available to the Department of Natural Resources’ personnel upon request.

Reporting
1. The permittee shall submit all quarterly reports required by 40 CFR Part 75. The permittee shall submit these reports to the Environmental Protection Agency (EPA) by direct computer-to-computer electronic transfer via EPA-provided software. These reports are due within 30 days after the end of each calendar quarter. The quarterly reports must include the following essential information:
   a) Facility information in accordance with §75.64(a)(1);
   b) Hourly and cumulative emissions data;
   c) Hourly unit operating information (e.g., load, heat input rate, operating time, etc.);
d) Monitoring plan information;
e) Results of required quality assurance tests (e.g., daily calibrations, linearity checks, RATAs, etc.); and
f) Certification statements from the Designated Representative or Authorized Account Representative (or the Alternate Representative), attesting to the completeness and accuracy of the data.

2. The permittee shall submit the electronic quarterly reports only to the EPA, not to the Missouri Department of Natural Resources. However, the permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 no later than ten days after any deviation from the monitoring or reporting requirements of this permit condition.

3. The permittee shall report any deviations from the standards, compliance provisions, performance testing, test methods, recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and compliance certification required by Section V of this permit.

---

**PERMIT CONDITION 007**
10 CSR 10-6.270 Acid Rain Source Permits Required

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Description</th>
<th>Manufacturer/ Model #</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP07</td>
<td>Boiler #2, dry bottom, tangential-fired boiler; primary fuel - coal; start-up fuel - #2 fuel oil, petroleum coke, supplemental fuel – clean biomass such as switch grass; MHDR 2130 MMBtu/hr; equipped with dedicated electrostatic precipitator (ESP) to control PM; exhausts to common stack with EP08; installed 1960</td>
<td>Combustion Engineering</td>
</tr>
<tr>
<td>EP08</td>
<td>Boiler #3, dry bottom, tangential-fired boiler; primary fuel - coal; start-up fuel - #2 fuel oil, petroleum coke, supplemental fuel – clean biomass such as switch grass; MHDR 2250 MMBtu/hr; equipped with dedicated electrostatic precipitator (ESP) to control PM; exhausts to common stack with EP07; installed 1964</td>
<td>Combustion Engineering</td>
</tr>
</tbody>
</table>

**Emission Limitation**
The permittee shall obtain an Acid Rain Source Permit for EP07 and EP08 pursuant to Title IV of the Clean Air Act.

A Phase II permit (Missouri Department of Natural Resources project 2014-05-065, ORIS Code 2080) is being issued to the facility in conjunction with this operating permit (See Attachment F). Sulfur dioxide (SO2) limitations are referenced in this existing Title IV: Phase II Acid Rain Permit for the installation. No changes to the installation’s status were reflected in this renewal application.

**Monitoring/Recordkeeping**
1) The permittee shall retain the most current acid rain permit issued to this installation onsite.
2) The permittee shall make the most current acid rain permit available to any Missouri Department of Natural Resources' personnel upon request

**Reporting**
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.

---

**PERMIT CONDITION 008**

10 CSR 10-6.362, Clean Air Interstate Rule Annual NO\(_X\) Trading Program
10 CSR 10-6.364, Clean Air Interstate Rule Seasonal NO\(_X\) Trading Program
10 CSR 10-6.366, Clean Air Interstate Rule SO\(_2\) Trading Program

---

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Description</th>
<th>Manufacturer/ Model #</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP07</td>
<td>Boiler #2, dry bottom, tangential-fired boiler; primary fuel - coal; start-up</td>
<td>Combustion Engineering</td>
</tr>
<tr>
<td></td>
<td>fuel - #2 fuel oil, petroleum coke, supplemental fuel – clean biomass such</td>
<td></td>
</tr>
<tr>
<td></td>
<td>as switch grass; MHDR 2130 MMBtu/hr; equipped with dedicated electrostatic</td>
<td></td>
</tr>
<tr>
<td></td>
<td>precipitator (ESP) to control PM; exhausts to common stack with EP08;</td>
<td></td>
</tr>
<tr>
<td></td>
<td>installed 1960</td>
<td></td>
</tr>
<tr>
<td>EP08</td>
<td>Boiler #3, dry bottom, tangential-fired boiler; primary fuel - coal; start-</td>
<td>Combustion Engineering</td>
</tr>
<tr>
<td></td>
<td>up fuel - #2 fuel oil, petroleum coke, supplemental fuel – clean biomass</td>
<td></td>
</tr>
<tr>
<td></td>
<td>such as switch grass; MHDR 2250 MMBtu/hr; equipped with dedicated electro-</td>
<td></td>
</tr>
<tr>
<td></td>
<td>static precipitator (ESP) to control PM; exhausts to common stack with</td>
<td></td>
</tr>
<tr>
<td></td>
<td>EP07; installed 1964</td>
<td></td>
</tr>
</tbody>
</table>

---

The Clean Air Interstate Rule (CAIR) has recently been replaced by the Cross State Air Pollution Rule (CSAPR), however a CAIR Permit is being issued to this facility because the CAIR regulations have not been removed from the Missouri State Implementation Plan (SIP) at this time. KCP&L Montrose Generating Station is not required to hold CAIR allowances and therefore no violation of CAIR is possible. Once the CAIR regulations are removed from the SIP and replaced with CSAPR, Permit Condition 008 will expire and the limitation thereof will no longer apply to the installation. No action on the part of the permittee is required to remove Permit Condition 008 from the operating permit.

---

**Emission Limitation**
The permittee shall obtain a CAIR Permit for EP07 and EP08 pursuant to Title IV of the Clean Air Act.

A CAIR Permit is being issued to the permittee in conjunction with this Title V permit. (See Attachment G)

**Monitoring/Recordkeeping**
1) The permittee shall retain the CAIR permit issued to this installation onsite.
2) The permittee shall make the CAIR permit available to any Missouri Department of Natural Resources’ personnel upon request

**Reporting**
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.

---

**PERMIT CONDITION 009**

40 CFR Parts 70 and 97 Cross State Air Pollution Rule
10 CSR 10-6.372 Cross-State Air Pollution Rule Annual NOx Trading Allowance Allocations
10 CSR 10-6.374 Cross-State Air Pollution Rule Ozone Season NOx Trading Allowance Allocations
10 CSR 10-6.376 Cross-State Air Pollution Rule Annual SO2 Trading Allowance Allocations

---

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Description</th>
<th>Manufacturer/ Model #</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP07</td>
<td>Boiler #2, dry bottom, tangential-fired boiler; primary fuel - coal; start-up fuel - #2 fuel oil, petroleum coke, supplemental fuel – clean biomass such as switch grass; MHDR 2130 MMBtu/hr; equipped with dedicated electrostatic precipitator (ESP) to control PM; exhausts to common stack with EP08; installed 1960</td>
<td>Combustion Engineering</td>
</tr>
<tr>
<td>EP08</td>
<td>Boiler #3, dry bottom, tangential-fired boiler; primary fuel - coal; start-up fuel - #2 fuel oil, petroleum coke, supplemental fuel – clean biomass such as switch grass; MHDR 2250 MMBtu/hr; equipped with dedicated electrostatic precipitator (ESP) to control PM; exhausts to common stack with EP07; installed 1964</td>
<td>Combustion Engineering</td>
</tr>
</tbody>
</table>

The TR subject unit(s), and the unit-specific monitoring provisions, at this source are identified in the following table(s). These unit(s) are subject to the requirements for the TR NOX Annual Trading Program, TR NOX Ozone Season Trading Program, and TR SO2 Group 1 Trading Program.

<p>| Parameter | Continuous emission monitoring system or systems (CEMS) requirements pursuant to 40 CFR part 75, subpart B (for SO2 monitoring) and 40 CFR | Excerpted monitoring system requirements for gas- and oil-fired units pursuant to 40 CFR part 75, appendix D | Excerpted monitoring system requirements for gas- and oil-fired peaking units pursuant to 40 CFR part 75, appendix E | Low Mass Emissions excepted monitoring (LME) requirements for gas- and oil-fired units pursuant to 40 CFR part 75, subpart E | EPA-approved alternative monitoring system requirements pursuant to 40 CFR part 75, subpart E |</p>
<table>
<thead>
<tr>
<th>Parameter</th>
<th>Description</th>
<th>Unit 1</th>
<th>Unit 2</th>
<th>Unit 3</th>
<th>Unit 4</th>
<th>Unit 5</th>
<th>Unit 6</th>
<th>Unit 7</th>
<th>Unit 8</th>
</tr>
</thead>
<tbody>
<tr>
<td>SO\textsubscript{2}</td>
<td>EP07, EP08</td>
<td>-----</td>
<td>-----</td>
<td>-----</td>
<td>-----</td>
<td>-----</td>
<td>-----</td>
<td>-----</td>
<td>-----</td>
</tr>
<tr>
<td>NO\textsubscript{x}</td>
<td>EP07, EP08</td>
<td>-----</td>
<td>-----</td>
<td>-----</td>
<td>-----</td>
<td>-----</td>
<td>-----</td>
<td>-----</td>
<td>-----</td>
</tr>
<tr>
<td>Heat Input</td>
<td>EP07, EP08</td>
<td>-----</td>
<td>-----</td>
<td>-----</td>
<td>-----</td>
<td>-----</td>
<td>-----</td>
<td>-----</td>
<td>-----</td>
</tr>
</tbody>
</table>

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\textsubscript{x} Annual Trading Program), 97.530 through 97.535 (TR NO\textsubscript{x} Ozone Season Trading Program), and 97.630 through 97.635 (TR SO\textsubscript{2} 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](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\textsubscript{x} Annual Trading Program), 97.535 (TR NO\textsubscript{x} Ozone Season Trading Program), and/or 97.635 (TR SO\textsubscript{2} 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](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\textsubscript{x} Annual Trading Program), 97.530 through 97.534 (TR NO\textsubscript{x} Ozone Season Trading Program), and/or 97.630 through 97.634 (TR SO\textsubscript{2} 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\textsubscript{x} Annual Trading Program), 97.535 (TR NO\textsubscript{x} Ozone Season Trading Program), and/or 97.635 (TR SO\textsubscript{2} 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](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\textsubscript{x} Annual Trading Program), 97.530 through 97.534 (TR NO\textsubscript{x} Ozone Season Trading Program), and 97.630 through 97.634 (TR SO\textsubscript{2} 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\textsubscript{x} 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.

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

(1) The permittee, and the designated representative, of each TR NO\textsubscript{x} Annual source and each TR NO\textsubscript{x} 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
(2) The emissions data determined in accordance with 40 CFR 97.430 through 97.435 shall be used to calculate allocations of TR NOX Annual allowances under 40 CFR 97.411(a)(2) and (b) and 97.412 and to determine compliance with the TR NOX 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) NOX emissions requirements.

(1) TR NOX 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 NOX Annual source and each TR NOX Annual unit at the source shall hold, in the source's compliance account, TR NOX 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 NOX emissions for such control period from all TR NOX Annual units at the source.

(ii). If total NOX emissions during a control period in a given year from the TR NOX Annual units at a TR NOX Annual source are in excess of the TR NOX Annual emissions limitation set forth in paragraph (c)(1)(i) above, then:

(A). The permittee of the source and each TR NOX Annual unit at the source shall hold the TR NOX Annual allowances required for deduction under 40 CFR 97.424(d); and

(B). The permittee of the source and each TR NOX 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 NOX Annual assurance provisions.

(i). If total NOX emissions during a control period in a given year from all TR NOX Annual units at TR NOX 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 NOX 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 NOX 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 NOX 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 control period, by which each common designated representative’s share of such NOX emissions exceeds the respective common designated representative’s assurance level; and
(B) The amount by which total NOX emissions from all TR NOX Annual units at TR NOX Annual sources in the state for such control period exceed the state assurance level.

(ii). The permittee shall hold the TR NOX Annual allowances required under paragraph (c)(2)(i) above, as of midnight of November 1 (if it is a business day), or midnight of the first business day thereafter (if November 1 is not a business day), immediately after such control period.

(iii). Total NOX emissions from all TR NOX Annual units at TR NOX Annual sources in the State during a control period in a given year exceed the state assurance level if such total NOX emissions exceed the sum, for such control period, of the state NOX Annual trading budget under 40 CFR 97.410(a) and the state’s variability limit under 40 CFR 97.410(b).

(iv). It shall not be a violation of 40 CFR part 97, subpart AAAAA or of the Clean Air Act if total NOX emissions from all TR NOX Annual units at TR NOX Annual sources in the State during a control period exceed the state assurance level or if a common designated representative’s share of total NOX emissions from the TR NOX Annual units at TR NOX Annual sources in the state during a control period exceeds the common designated representative’s assurance level.

(v). To the extent the permittee fails to hold TR NOX Annual allowances for a control period in a given year in accordance with paragraphs (c)(2)(i) through (iii) above,

(A). The permittee shall pay any fine, penalty, or assessment or comply with any other remedy imposed under the Clean Air Act; and

(B). Each TR NOX Annual allowance that the owners and operators fail to hold for such control period in accordance with paragraphs (c)(2)(i) through (iii) above and each day of such control period shall constitute a separate violation of 40 CFR part 97, subpart AAAAA and the Clean Air Act.

(3) Compliance periods.

(i). A TR NOX Annual unit shall be subject to the requirements under paragraph (c)(1) above for the control period starting on the later of January 1, 2015, or the deadline for meeting the unit's monitor certification requirements under 40 CFR 97.430(b) and for each control period thereafter.

(ii). A TR NOX Annual unit shall be subject to the requirements under paragraph (c)(2) above for the control period starting on the later of January 1, 2017 or the deadline for meeting the unit's monitor certification requirements under 40 CFR 97.430(b) and for each control period thereafter.

(4) Vintage of allowances held for compliance.

(i). A TR NOX Annual allowance held for compliance with the requirements under paragraph (c)(1)(i) above for a control period in a given year must be a TR NOX Annual allowance that was allocated for such control period or a control period in a prior year.

(ii). A TR NOX Annual allowance held for compliance with the requirements under paragraphs (c)(1)(ii)(A) and (2)(i) through (iii) above for a control period in a given year must be a TR NOX Annual allowance that was allocated for a control period in a prior year or the control period in the given year or in the immediately following year.

(5) Allowance Management System requirements. Each TR NOX Annual allowance shall be held in, deducted from, or transferred into, out of, or between Allowance Management System accounts in accordance with 40 CFR part 97, subpart AAAAA.

(6) Limited authorization. A TR NOX Annual allowance is a limited authorization to emit one ton of NOX during the control period in one year. Such authorization is limited in its use and duration as follows:
(i). Such authorization shall only be used in accordance with the TR NOX Annual Trading Program; and

(ii). Notwithstanding any other provision of 40 CFR part 97, the Administrator has the authority to terminate or limit the use and duration of such authorization to the extent the Administrator determines is necessary or appropriate to implement any provision of the Clean Air Act.

(7) Property right. A TR NOX Annual allowance does not constitute a property right.

(d) Title V permit revision requirements.

(1) No title V permit revision shall be required for any allocation, holding, deduction, or transfer of TR NOX Annual allowances in accordance with 40 CFR part 97, subpart AAAAA.

(2) This permit incorporates the TR emissions monitoring, recordkeeping and reporting requirements pursuant to 40 CFR 97.430 through 97.435, 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) or 71.7(e)(1)(i)(B).

(e) Additional recordkeeping and reporting requirements.

(1) Unless otherwise provided, the owners and operators of each TR NOX Annual source and each TR NOX Annual unit at the source shall keep on site at the source each of the following documents (in hardcopy or electronic format) 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 Administrator.

(i). The certificate of representation under 40 CFR 97.416 for the designated representative for the source and each TR NOX Annual unit 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 certificate of representation and documents are superseded because of the submission of a new certificate of representation under 40 CFR 97.416 changing the designated representative.

(ii). All emissions monitoring information, in accordance with 40 CFR part 97, subpart AAAAA.

(iii). Copies of all reports, compliance certifications, and other submissions and all records made or required under, or to demonstrate compliance with the requirements of, the TR NOX Annual Trading Program.

(2) The designated representative of a TR NOX Annual source and each TR NOX Annual unit at the source shall make all submissions required under the TR NOX Annual Trading Program, except as provided in 40 CFR 97.418. This requirement does not change, create an exemption from, or otherwise affect the responsible official submission requirements under a title V operating permit program in 40 CFR parts 70 and 71.

(f) Liability.

(1) Any provision of the TR NOX Annual Trading Program that applies to a TR NOX Annual source or the designated representative of a TR NOX Annual source shall also apply to the owners and operators of such source and of the TR NOX Annual units at the source.
(2) Any provision of the TR NOX Annual Trading Program that applies to a TR NOX Annual unit or the designated representative of a TR NOX Annual unit shall also apply to the owners and operators of such unit.

(g) **Effect on other authorities.**

No provision of the TR NOX Annual Trading Program or exemption under 40 CFR 97.405 shall be construed as exempting or excluding the owners and operators, and the designated representative, of a TR NOX Annual source or TR NOX Annual unit from compliance with any other provision of the applicable, approved state implementation plan, a federally enforceable permit, or the Clean Air Act.

**TR NOX Ozone Season Trading Program Requirements (40 CFR 97.506)**

**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 97.513 through 97.518.

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

(1) The permittee, and the designated representative, of each TR NOX Ozone Season source and each TR NOX Ozone Season unit at the source shall comply with the monitoring, reporting, and recordkeeping requirements of 40 CFR 97.530 (general requirements, including installation, certification, and data accounting, compliance deadlines, reporting data, prohibitions, and long-term cold storage), 97.531 (initial monitoring system certification and recertification procedures), 97.532 (monitoring system out-of-control periods), 97.533 (notifications concerning monitoring), 97.534 (recordkeeping and reporting, including monitoring plans, certification applications, quarterly reports, and compliance certification), and 97.535 (petitions for alternatives to monitoring, recordkeeping, or reporting requirements).

(2) The emissions data determined in accordance with 40 CFR 97.530 through 97.535 shall be used to calculate allocations of TR NOX Ozone Season allowances under 40 CFR 97.511(a)(2) and (b) and 97.512 and to determine compliance with the TR NOX Ozone Season 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 97.530 through 97.535 and rounded to the nearest ton, with any fraction of a ton less than 0.50 being deemed to be zero.

(b) **NOX emissions requirements.**

(1) TR NOX Ozone Season emissions limitation.

(i) As of the allowance transfer deadline for a control period in a given year, the owners and operators of each TR NOX Ozone Season source and each TR NOX Ozone Season unit at the source shall hold, in the source's compliance account, TR NOX Ozone Season allowances available for deduction for such control period under 40 CFR 97.524(a) in an amount not less than the tons of total NOX emissions for such control period from all TR NOX Ozone Season units at the source.

(ii) If total NOX emissions during a control period in a given year from the TR NOX Ozone Season units at a TR NOX Ozone Season source are in excess of the TR NOX Ozone Season emissions limitation set forth in paragraph (c)(1)(i) above, then:

(A) The permittee of the source and each TR NOX Ozone Season unit at the source shall hold the TR NOX Ozone Season allowances required for deduction under 40 CFR 97.524(d); and

(B) The permittee of the source and each TR NOX Ozone Season 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 BBBBB and the Clean Air Act.

(2) TR NOX Ozone Season assurance provisions.

(i). If total NOX emissions during a control period in a given year from all TR NOX Ozone Season units at TR NOX Ozone Season sources in the state exceed the state assurance level, then The permittee 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 NOX 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 NOX Ozone Season allowances available for deduction for such control period under 40 CFR 97.525(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 97.525(b), of multiplying—

(A). The quotient of the amount by which the common designated representative’s share of such NOX 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 control period, by which each common designated representative’s share of such NOX emissions exceeds the respective common designated representative’s assurance level; and

(B). The amount by which total NOX emissions from all TR NOX Ozone Season units at TR NOX Ozone Season sources in the state for such control period exceed the state assurance level.

(ii). The permittee shall hold the TR NOX Ozone Season allowances required under paragraph (c)(2)(i) above, as of midnight of November 1 (if it is a business day), or midnight of the first business day thereafter (if November 1 is not a business day), immediately after such control period.

(iii). Total NOX emissions from all TR NOX Ozone Season units at TR NOX Ozone Season sources in the state during a control period in a given year exceed the state assurance level if such total NOX emissions exceed the sum, for such control period, of the State NOX Ozone Season trading budget under 40 CFR 97.510(a) and the state’s variability limit under 40 CFR 97.510(b).

(iv). It shall not be a violation of 40 CFR part 97, subpart BBBBBB or of the Clean Air Act if total NOX emissions from all TR NOX Ozone Season units at TR NOX Ozone Season sources in the state during a control period exceed the state assurance level or if a common designated representative’s share of total NOX emissions from the TR NOX Ozone Season units at TR NOX Ozone Season sources in the state during a control period exceeds the common designated representative’s assurance level.

(v). To the extent the permittee fails to hold TR NOX Ozone Season allowances for a control period in a given year in accordance with paragraphs (c)(2)(i) through (iii) above,

(A). The permittee shall pay any fine, penalty, or assessment or comply with any other remedy imposed under the Clean Air Act; and

(B). Each TR NOX Ozone Season allowance that the permittee fails to hold for such control period in accordance with paragraphs (c)(2)(i) through (iii) above and each day of such control period shall constitute a separate violation of 40 CFR part 97, subpart BBBBBB and the Clean Air Act.
(3) Compliance periods.
   (i). A TR NO\(_X\) Ozone Season unit shall be subject to the requirements under paragraph (c)(1)
       above for the control period starting on the later of May 1, 2015 or the deadline for meeting
       the unit's monitor certification requirements under 40 CFR 97.530(b) and for each control
       period thereafter.
   (ii). A TR NO\(_X\) Ozone Season unit shall be subject to the requirements under paragraph (c)(2)
       above for the control period starting on the later of May 1, 2017 or the deadline for meeting
       the unit's monitor certification requirements under 40 CFR 97.530(b) and for each control
       period thereafter.

(4) Vintage of allowances held for compliance.
   (i). A TR NO\(_X\) Ozone Season allowance held for compliance with the requirements under
       paragraph (c)(1)(i) above for a control period in a given year must be a TR NO\(_X\) Ozone
       Season allowance that was allocated for such control period or a control period in a prior
       year.
   (ii). A TR NO\(_X\) Ozone Season allowance held for compliance with the requirements under
       paragraphs (c)(1)(ii)(A) and (2)(i) through (iii) above for a control period in a given year
       must be a TR NO\(_X\) Ozone Season allowance that was allocated for a control period in a
       prior year or the control period in the given year or in the immediately following year.

(5) Allowance Management System requirements. Each TR NO\(_X\) Ozone Season allowance shall be
    held in, deducted from, or transferred into, out of, or between Allowance Management System
    accounts in accordance with 40 CFR part 97, subpart BBBBB.

(6) Limited authorization. A TR NO\(_X\) Ozone Season allowance is a limited authorization to emit one
    ton of NO\(_X\) during the control period in one year. Such authorization is limited in its use and
    duration as follows:
    (i). Such authorization shall only be used in accordance with the TR NO\(_X\) Ozone Season
        Trading Program; and
    (ii). Notwithstanding any other provision of 40 CFR part 97, subpart BBBBB, the
        Administrator has the authority to terminate or limit the use and duration of such
        authorization to the extent the Administrator determines is necessary or appropriate to
        implement any provision of the Clean Air Act.

(7) Property right. A TR NO\(_X\) Ozone Season allowance does not constitute a property right.

(c) Title V permit revision requirements.
(1) No title V permit revision shall be required for any allocation, holding, deduction, or transfer of
    TR NO\(_X\) Ozone Season allowances in accordance with 40 CFR part 97, subpart BBBBB.

(2) This permit incorporates the TR emissions monitoring, recordkeeping and reporting
    requirements pursuant to 40 CFR 97.530 through 97.535, 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 97.506(d)(2) and
    70.7(e)(2)(i)(B) or 71.7(e)(1)(i)(B).

(d) Additional recordkeeping and reporting requirements.
(1) Unless otherwise provided, the permittee of each TR NO\(_X\) Ozone Season source and each TR
    NO\(_X\) Ozone Season unit at the source shall keep on site at the source each of the following
    documents (in hardcopy or electronic format) 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 Administrator.

(i). The certificate of representation under 40 CFR 97.516 for the designated representative for the source and each TR NO\(_x\) Ozone Season unit 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 certificate of representation and documents are superseded because of the submission of a new certificate of representation under 40 CFR 97.516 changing the designated representative.

(ii). All emissions monitoring information, in accordance with 40 CFR part 97, subpart BBBB.

(iii). Copies of all reports, compliance certifications, and other submissions and all records made or required under, or to demonstrate compliance with the requirements of, the TR NO\(_x\) Ozone Season Trading Program.

(2) The designated representative of a TR NO\(_x\) Ozone Season source and each TR NO\(_x\) Ozone Season unit at the source shall make all submissions required under the TR NO\(_x\) Ozone Season Trading Program, except as provided in 40 CFR 97.518. This requirement does not change, create an exemption from, or otherwise affect the responsible official submission requirements under a title V operating permit program in 40 CFR parts 70 and 71.

(e) Liability.

(1) Any provision of the TR NO\(_x\) Ozone Season Trading Program that applies to a TR NO\(_x\) Ozone Season source or the designated representative of a TR NO\(_x\) Ozone Season source shall also apply to the owners and operators of such source and of the TR NO\(_x\) Ozone Season units at the source.

(2) Any provision of the TR NO\(_x\) Ozone Season Trading Program that applies to a TR NO\(_x\) Ozone Season unit or the designated representative of a TR NO\(_x\) Ozone Season unit shall also apply to the owners and operators of such unit.

(f) Effect on other authorities.

No provision of the TR NO\(_x\) Ozone Season Trading Program or exemption under 40 CFR 97.505 shall be construed as exempting or excluding the permittee, and the designated representative, of a TR NO\(_x\) Ozone Season source or TR NO\(_x\) Ozone Season unit from compliance with any other provision of the applicable, approved state implementation plan, a federally enforceable permit, or the Clean Air Act.

**TR SO\(_2\) Group 1 Trading Program requirements (40 CFR 97.606)**

(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 97.613 through 97.618.

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

(1) The permittee, and the designated representative, of each TR SO\(_2\) Group 1 source and each TR SO\(_2\) Group 1 unit at the source shall comply with the monitoring, reporting, and recordkeeping requirements of 40 CFR 97.630 (general requirements, including installation, certification, and data accounting, compliance deadlines, reporting data, prohibitions, and long-term cold storage), 97.631 (initial monitoring system certification and recertification procedures), 97.632 (monitoring system out-of-control periods), 97.633 (notifications concerning monitoring), 97.634 (recordkeeping and reporting, including monitoring plans, certification applications, quarterly
(2) The emissions data determined in accordance with 40 CFR 97.630 through 97.635 shall be used to calculate allocations of TR SO₂ Group 1 allowances under 40 CFR 97.611(a)(2) and (b) and 97.612 and to determine compliance with the TR SO₂ Group 1 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 97.630 through 97.635 and rounded to the nearest ton, with any fraction of a ton less than 0.50 being deemed to be zero.

(c) SO₂ emissions requirements.

(1) TR SO₂ Group 1 emissions limitation.

(i). As of the allowance transfer deadline for a control period in a given year, the owners and operators of each TR SO₂ Group 1 source and each TR SO₂ Group 1 unit at the source shall hold, in the source's compliance account, TR SO₂ Group 1 allowances available for deduction for such control period under 40 CFR 97.624(a) in an amount not less than the tons of total SO₂ emissions for such control period from all TR SO₂ Group 1 units at the source.

(ii). If total SO₂ emissions during a control period in a given year from the TR SO₂ Group 1 units at a TR SO₂ Group 1 source are in excess of the TR SO₂ Group 1 emissions limitation set forth in paragraph (c)(1)(i) above, then:

(A). The permittee of the source and each TR SO₂ Group 1 unit at the source shall hold the TR SO₂ Group 1 allowances required for deduction under 40 CFR 97.624(d); and

(B). The permittee of the source and each TR SO₂ Group 1 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 40 CFR part 97, subpart CCCCC and the Clean Air Act.

(2) TR SO₂ Group 1 assurance provisions.

(i). If total SO₂ emissions during a control period in a given year from all TR SO₂ Group 1 units at TR SO₂ Group 1 sources in the state exceed the state assurance level, then the permittee 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 SO₂ 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 permittee of such group) TR SO₂ Group 1 allowances available for deduction for such control period under 40 CFR 97.625(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 97.625(b), of multiplying—

(A). The quotient of the amount by which the common designated representative’s share of such SO₂ 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 control period, by which each common designated representative’s share of such SO₂ emissions exceeds the respective common designated representative’s assurance level; and
(B). The amount by which total SO₂ emissions from all TR SO₂ Group 1 units at TR SO₂ Group 1 sources in the state for such control period exceed the state assurance level.

(ii). The permittee shall hold the TR SO₂ Group 1 allowances required under paragraph (c)(2)(i) above, as of midnight of November 1 (if it is a business day), or midnight of the first business day thereafter (if November 1 is not a business day), immediately after such control period.

(iii). Total SO₂ emissions from all TR SO₂ Group 1 units at TR SO₂ Group 1 sources in the state during a control period in a given year exceed the state assurance level if such total SO₂ emissions exceed the sum, for such control period, of the state SO₂ Group 1 trading budget under 40 CFR 97.610(a) and the state’s variability limit under 40 CFR 97.610(b).

(iv). It shall not be a violation of 40 CFR part 97, subpart CCCCC or of the Clean Air Act if total SO₂ emissions from all TR SO₂ Group 1 units at TR SO₂ Group 1 sources in the state during a control period exceed the state assurance level or if a common designated representative’s share of total SO₂ emissions from the TR SO₂ Group 1 units at TR SO₂ Group 1 sources in the during a control period exceeds the common designated representative’s assurance level.

(v). To the extent the permittee fails to hold TR SO₂ Group 1 allowances for a control period in a given year in accordance with paragraphs (c)(2)(i) through (iii) above,

(A). The permittee shall pay any fine, penalty, or assessment or comply with any other remedy imposed under the Clean Air Act; and

(B). Each TR SO₂ Group 1 allowance that the permittee fails to hold for such control period in accordance with paragraphs (c)(2)(i) through (iii) above and each day of such control period shall constitute a separate violation of 40 CFR part 97, subpart CCCCC and the Clean Air Act.

(3) Compliance periods.

(i). A TR SO₂ Group 1 unit shall be subject to the requirements under paragraph (c)(1) above for the control period starting on the later of January 1, 2015 or the deadline for meeting the unit's monitor certification requirements under 40 CFR 97.630(b) and for each control period thereafter.

(ii). A TR SO₂ Group 1 unit shall be subject to the requirements under paragraph (c)(2) above for the control period starting on the later of January 1, 2017 or the deadline for meeting the unit's monitor certification requirements under 40 CFR 97.630(b) and for each control period thereafter.

(4) Vintage of allowances held for compliance.

(i). A TR SO₂ Group 1 allowance held for compliance with the requirements under paragraph (c)(1)(i) above for a control period in a given year must be a TR SO₂ Group 1 allowance that was allocated for such control period or a control period in a prior year.

(ii). A TR SO₂ Group 1 allowance held for compliance with the requirements under paragraphs (c)(1)(ii)(A) and (2)(i) through (iii) above for a control period in a given year must be a TR SO₂ Group 1 allowance that was allocated for a control period in a prior year or the control period in the given year or in the immediately following year.

(5) Allowance Management System requirements. Each TR SO₂ Group 1 allowance shall be held in, deducted from, or transferred into, out of, or between Allowance Management System accounts in accordance with 40 CFR part 97, subpart CCCCC.

(6) Limited authorization. A TR SO₂ Group 1 allowance is a limited authorization to emit one ton of SO₂ during the control period in one year. Such authorization is limited in its use and duration as follows:
(i). Such authorization shall only be used in accordance with the TR SO2 Group 1 Trading Program; and
(ii). Notwithstanding any other provision of 40 CFR part 97, subpart CCCCC, the Administrator has the authority to terminate or limit the use and duration of such authorization to the extent the Administrator determines is necessary or appropriate to implement any provision of the Clean Air Act.

(7) Property right. A TR SO2 Group 1 allowance does not constitute a property right.

(d) Title V permit revision requirements.
(1) No title V permit revision shall be required for any allocation, holding, deduction, or transfer of TR SO2 Group 1 allowances in accordance with 40 CFR part 97, subpart CCCCC.
(2) This permit incorporates the TR emissions monitoring, recordkeeping and reporting requirements pursuant to 40 CFR 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 part 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 97.606(d)(2) and 70.7(e)(2)(i)(B) or 71.7(e)(1)(i)(B).

(e) Additional recordkeeping and reporting requirements.
(1) Unless otherwise provided, the permittee of each TR SO2 Group 1 source and each TR SO2 Group 1 unit at the source shall keep on site at the source each of the following documents (in hardcopy or electronic format) 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 Administrator.
   (i). The certificate of representation under 40 CFR 97.616 for the designated representative for the source and each TR SO2 Group 1 unit 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 certificate of representation and documents are superseded because of the submission of a new certificate of representation under 40 CFR 97.616 changing the designated representative.
   (ii). All emissions monitoring information, in accordance with 40 CFR part 97, subpart CCCCC.
   (iii). Copies of all reports, compliance certifications, and other submissions and all records made or required under, or to demonstrate compliance with the requirements of, the TR SO2 Group 1 Trading Program.
(2) The designated representative of a TR SO2 Group 1 source and each TR SO2 Group 1 unit at the source shall make all submissions required under the TR SO2 Group 1 Trading Program, except as provided in 40 CFR 97.618. This requirement does not change, create an exemption from, or otherwise affect the responsible official submission requirements under a title V operating permit program in 40 CFR parts 70 and 71.

(f) Liability.
(1) Any provision of the TR SO2 Group 1 Trading Program that applies to a TR SO2 Group 1 source or the designated representative of a TR SO2 Group 1 source shall also apply to the owners and operators of such source and of the TR SO2 Group 1 units at the source.
(2) Any provision of the TR SO\textsubscript{2} Group 1 Trading Program that applies to a TR SO\textsubscript{2} Group 1 unit or the designated representative of a TR SO\textsubscript{2} Group 1 unit shall also apply to the owners and operators of such unit.

(g) **Effect on other authorities.**
No provision of the TR SO\textsubscript{2} Group 1 Trading Program or exemption under 40 CFR 97.605 shall be construed as exempting or excluding the owners and operators, and the designated representative, of a TR SO\textsubscript{2} Group 1 source or TR SO\textsubscript{2} Group 1 unit from compliance with any other provision of the applicable, approved state implementation plan, a federally enforceable permit, or the Clean Air Act.

### PERMIT CONDITION 010

10 CSR 10-6.075 Maximum Achievable Control Technology Regulations

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Description</th>
<th>Manufacturer/ Model #</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP19</td>
<td>Emergency Fire Pump – reciprocating internal combustion engine; diesel fired, MHDR 1.01 MMBtu/hr (400 HP); installed 1993</td>
<td>Caterpillar 3406</td>
</tr>
<tr>
<td>EP65</td>
<td>Emergency Generator Engine; diesel fired; 250 HP; installed 1999</td>
<td>Kohler model 180ROZ5</td>
</tr>
</tbody>
</table>

**Operational Limitations:**

1) The permittee shall be in compliance with the requirements of MACT ZZZZ that apply at all times. \([\$63.6605(a)]\)

2) At all times the permittee shall operate and maintain the affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require the permittee to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Director which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. \([\$63.6605(b)]\)

3) The permittee shall meet the following requirements: \([\$63.6602 and Table 2c to MACT ZZZZ]\)
   a) Change the engine oil and oil filter every 500 hours of operation or annually, whichever comes first;
   b) Inspect the air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary;
   c) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.
   d) During periods of startup the permittee shall minimize the engine’s time spent at idle and minimize the engine’s startup time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes.
e) If an emergency engine is operating during an emergency and it is not possible to shut down the engine in order to perform the work practice requirements on the schedule required in Table 2c of MACT ZZZZ, or if performing the work practice on the required schedule would otherwise pose an unacceptable risk under federal, state, or local law, the work practice can be delayed until the emergency is over or the unacceptable risk under federal, state, or local law has abated. The work practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under federal, state, or local law has abated. The permittee shall report any failure to perform the work practice on the schedule required and the federal, state or local law under which the risk was deemed unacceptable.

f) The permittee has the option to utilize an oil analysis program as described in §63.6625(i) in order to extend the specified oil change requirement in Table 2c of MACT ZZZZ.

g) The permittee may petition the Administrator pursuant to the requirements of §63.6(g) for alternative work practices.

3) The permittee shall operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop a maintenance plan which shall provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. [§63.6625(e)]

4) The permittee shall install a non-resettable hour meter if one is not already installed. [§63.6625(f)]

5) The permittee has the option of utilizing an oil analysis program in order to extend the specified oil change requirements in Table 2c to MACT ZZZZ. The oil analysis shall be performed at every 500 hours of operation or annually. The analysis program shall at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Base Number is less than 30 percent of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the permittee is not required to change the oil. If any of the limits are exceeded, the permittee shall change the oil within two business days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the permittee shall change the oil within two business days or before commencing operation, whichever is later. The permittee shall keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program shall be part of the maintenance plan for the engine. [§63.6625(i)]

6) The permittee shall operate the emergency stationary RICE according to the requirements in §63.6640(f)(1) through (3). In order for the engine to be considered an emergency stationary RICE under MACT ZZZZ, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year, as described in §63.6640(f)(1) through (3), is prohibited. If the permittee does not operate the engine according to the requirements of §63.6640(f)(1) through (3), the engine will not be considered an emergency engine under MACT ZZZZ and shall meet the requirements for non-emergency engines. [§63.6640(f)]

   a) There is no time limit on the use of emergency stationary RICE in emergency situations. [§63.6640(f)(1)]

   b) The permittee may operate the emergency stationary RICE for any combination of purposes specified in §63.6640(f)(2)(i) for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by §63.6640(f)(3) counts as part of the 100 hours per calendar year allowed by this paragraph. [§63.6640(f)(2)]
c) Emergency stationary RICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The permittee may petition the Director for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the permittee maintains records indicating that federal, state, or local standards require maintenance and testing of emergency RICE beyond 100 hours per calendar year. [§63.6640(f)(2)(i)]

d) Emergency stationary RICE located at major sources of HAP may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in §63.6640(f)(2). The 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity. [§63.6640(f)(3)]

**General Provisions:**
The permittee shall refer to Table 8 to MACT ZZZZ for MACT A applicability.

**Recordkeeping:**
1) The permittee shall retain the following records for this engine:
   a) Records of the occurrence and duration of each malfunction of process equipment. [§63.6655(a)(2)]
   b) Records of all required maintenance performed on the air pollution control and monitoring equipment. [§63.6655(a)(4)]
   c) Records of actions taken during periods of malfunction to minimize emissions including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. [§63.6655(a)(5)]

2) The permittee shall retain records of the maintenance conducted on the stationary RICE in order to demonstrate that the permittee operated and maintained the stationary RICE and after-treatment control device (if any) according to the maintenance plan. [§63.6655(e)]

3) The permittee shall retain records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The permittee shall document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation. [§63.6655(f)]

4) Records shall be in a form suitable and readily available for expeditious review according to §63.10(b)(1). [§63.6660(a)]

5) As specified in §63.10(b)(1), the permittee shall retain each record for five years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. [§63.6660(b)]

6) The permittee shall retain each record readily accessible in hard copy or electronic form for at least five years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to §63.10(b)(1). [§63.6660(c)]

7) These records must be made available for inspection upon request by Missouri Department of Natural Resources’ personnel. [§70.6(a)(3)(ii)]
**Reporting:**
The permittee shall report any deviations from the requirements of this permit condition in the semi-annual monitoring report and compliance certification required by Section V of this permit. [§70.6(a)(3)(iii)]

---

**PERMIT CONDITION 011**
10 CSR 10-6.070 New Source Performance Standards
40 CFR Part 60 Subpart III Standards of Performance for Stationary Compression Ignition Internal Combustion Engines

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Description</th>
<th>Manufacturer/ Model #</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP64</td>
<td>Emergency Generator Engine; diesel fired; 47 HP; MHDR 0.39 MMBtu/hr; installed 2008</td>
<td>Kohler model 180ROZ5 Caterpillar 2405/1800</td>
</tr>
</tbody>
</table>

**Emission Limitation**
1) The permittee shall comply with the emission standards for new nonroad CI engines in §60.4202(a)(1) and Table 2 to Subpart III of Part 60, for all pollutants, for the same model year and maximum engine power for their 2007 model year and later emergency stationary CI ICE. [§60.4205(b)]
2) The permittee shall not allow exhaust emissions that exceed 7.5 grams per kilowatt-hour (5.6 g/HP-hr) of NMHC+NOx, 5.5 grams per kilowatt-hour (4.1 g/HP-hr) of CO, and 0.30 grams per kilowatt-hour (0.22 g/HP-hr) of PM. [§60.4202(a) and Table 2 to Subpart III of Part 60]
3) The permittee shall operate and maintain stationary CI ICE that achieve the emission standards as required in §60.4205 over the entire life of the engine. [§60.4206]

**Operational Limitation**
1) The permittee shall purchase diesel fuel that meets the requirements of 40 CFR 80.510(b) for nonroad diesel fuel. [§60.4207(b)]
2) All diesel fuel is subject to the following per-gallon standards: [§80.510(b)]
   a) Sulfur content. [§80.510(b)(1)]
      i) 15 ppm maximum. [§80.510(b)(1)(i)]
   b) Cetane index or aromatic content, as follows: [§80.510(b)(2)]
      i) A minimum cetane index of 40; or [§80.510(b)(2)(i)]
      ii) A maximum aromatic content of 35 volume percent. [§80.510(b)(2)(ii)]

**Compliance Requirements**
1) The permittee shall operate and maintain the stationary CI internal combustion engine and control device according to the manufacturer's emission-related written instructions; [§60.4211(a)(1)]
2) The permittee shall change only those emission-related settings that are permitted by the manufacturer [§60.4211(a)(2)]
3) The permittee shall meet the requirements of 40 CFR Parts 89, 94 and/or 1068, as they apply. [§60.4211(a)(3)]

4) The permittee shall comply with 40 CFR Part 60 Subpart III by purchasing an engine certified to the emission standards in §60.4205(b), as applicable, for the same model year and engine power. The engine must be installed and configured according to the manufacturer's emission-related specifications. [§60.4211(c)]

5) Emergency stationary ICE may be operated for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by Federal, State or local government, the manufacturer, the vendor, or the insurance company associated with the engine. Maintenance checks and readiness testing of such units is limited to 100 hours per year. There is no time limit on the use of emergency stationary ICE in emergency situations. The permittee may petition the Director for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the permittee maintains records indicating that Federal, State, or local standards require maintenance and testing of emergency ICE beyond 100 hours per year. Emergency stationary ICE may operate up to 50 hours per year in non-emergency situations, but those 50 hours are counted towards the 100 hours per year provided for maintenance and testing. The 50 hours per year for non-emergency situations cannot be used for peak shaving or to generate income for a facility to supply power to an electric grid or otherwise supply non-emergency power as part of a financial arrangement with another entity. For permittees of emergency engines, any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per year, as permitted in this section, is prohibited. [§60.4211(f)]

6) Exhaust emissions from stationary CI ICE that are complying with the emission standards for new CI engines in 40 CFR 89.112, as applicable, shall not exceed the NTE numerical requirements, rounded to the same number of decimal places as the applicable standard in 40 CFR 89.112, as applicable, determined from the following equation:

\[
\text{NTE requirement for each pollutant} = (\cdot 25) \times (\text{STD}) \quad \text{(Eq. 1)}
\]

Where:

STD = The standard specified for that pollutant in 40 CFR 89.112, as applicable.

Alternatively, stationary CI ICE that are complying with the emission standards for new CI engines in 40 CFR 89.112 may follow the testing procedures specified in §60.4213 of subpart III, as appropriate. [§60.4212(c)]

**Monitoring**

The permittee shall install a non-resettable hour meter prior to startup of the engine. [§60.4209(a)]

**Recordkeeping**

1) The permittee shall keep records of the operation of the engine in emergency and non-emergency service that are recorded through the non-resettable hour meter. The permittee must record the time of operation of the engine and the reason the engine was in operation during that time. [§60.4214(b)]

2) These records shall be made available for inspection to the Department of Natural Resources' personnel upon request.

3) All records shall be maintained for five years.
Reporting

1) The permittee shall report to the Air Pollution Control Program’s Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any exceedance of any limitation established by this permit condition.

2) The permittee shall report any deviations from the emission limitations, monitoring/recordkeeping, and reporting requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

PERMIT CONDITION 012
10 CSR 10-6.261 Control of Sulfur Dioxide Emissions

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Description</th>
<th>Manufacturer/ Model #</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP19</td>
<td>Emergency Fire Pump – reciprocating internal combustion engine; diesel fired, MHDR 1.01 MMBtu/hr (400 HP); installed 1993</td>
<td>Caterpillar 3406</td>
</tr>
<tr>
<td>EP65</td>
<td>Emergency Generator Engine; diesel fired; 250 HP; installed 1999</td>
<td>Kohler model 180ROZ5</td>
</tr>
</tbody>
</table>

Emission Limitation:
Emissions from any new source operation shall not contain more than 8,812 parts per million (ppmv) of sulfur content for distillate fuel.

Monitoring/Recordkeeping:
1) The permittee shall determine compliance using fuel delivery records or other compliance methods approved by the staff director and the U.S. Environmental Protection agency and incorporated into the state implementation plan.

2) The permittee must report any excess emissions other than startup, shutdown and malfunction excess emissions to the staff director for each calendar quarter within thirty (30) days following the end of the quarter. In all cases, the notification must be a written report and must include, at a minimum, the following:
   a) Name and location of source;
   b) Name and telephone number of person responsible for the source;
   c) Identity and description of the equipment involved;
   d) Time and duration of the period of excess emissions;
   e) Type of activity;
   f) Estimate of the magnitude of the excess emissions expressed in the units of the applicable emission control regulation and the operating data and calculations used in estimating the magnitude;
   g) Measures taken to mitigate the extent and duration of the excess emissions; and
   h) Measures taken to remedy the situation which cause the excess emissions and the measures taken or planned to prevent the recurrence of these situations.
3) The permittee must maintain a list of modifications to the source’s operating procedures or other routine procedures instituted to prevent or minimize the occurrence of any excess emissions.

4) The permittee must maintain a record of data, calculations, results, records and reports from any fuel deliveries, and/or fuel sampling tests.

5) The permittee of sources using fuel delivery records for compliance must also maintain the fuel supplier information to certify all fuel deliveries. Bills of lading and/or other fuel deliver documentation containing the following information for all fuel purchases or deliveries are deemed acceptable to comply with the requirements of this rule:
   a) The name, address, and contact information of the fuel supplier;
   b) The type of fuel; and
   c) The sulfur content or maximum sulfur content expressed in percent sulfur by weight or in ppm sulfur.

6) The permittee of sources using fuel sampling and analysis for compliance must also follow the requirements in 10 CSR 10-6.261(5)(D).

7) The permittee of sources using performance testing for compliance must also follow the requirements in 10 CSR 10-6.261(5)(A)

8) All required reports and records must be retained on-site for a minimum of five (5) years and made available within five (5) business days upon written or electronic request by the director.

9) The permittee must furnish the director all data necessary to determine compliance status.

Reporting:
The permittee shall report any deviations from the emission limitations, monitoring/recordkeeping, and reporting requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit
PERMIT CONDITION 013
10 CSR 10-6.260 Restriction of Emission of Sulfur Compounds

### Emergency Engines

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Description</th>
<th>Manufacturer/ Model #</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP19</td>
<td>Emergency Fire Pump – reciprocating internal combustion engine; diesel fired, MMBtu/hr (400 HP); installed 1993</td>
<td>Caterpillar 3406</td>
</tr>
<tr>
<td>EP65</td>
<td>Emergency Generator Engine; diesel fired; 250 HP; installed 1999</td>
<td>Kohler model 180ROZ5</td>
</tr>
</tbody>
</table>

10 CSR 10-6.260 is a federal-only requirement. See Statement of Basis for explanation for why 10 CSR 10-6.260 is included in the operating permit as an applicable regulation.

**Emission Limitations:**

Emissions from any new source operation (installed or under construction in the Kansas City Metropolitan area after September 25, 1968) shall not contain 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 three gases averaged on any non-consecutive three (3)-hour period.

**Monitoring/Recordkeeping/Reporting:**

Compliance with the Monitoring, Recordkeeping and Reporting requirements of Permit Condition 012 are sufficient to ensure compliance.
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), the Code of State Regulations (CSR), and local ordinances for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued. The following are only excerpts from the regulation or code, and are provided for summary purposes only.

**10 CSR 10-6.045 Open Burning Requirements**

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

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

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

1) In the event of a malfunction, which results in excess emissions that exceed one hour, the permittee shall submit to the director within two business days, in writing, the following information:
   a) Name and location of installation;
   b) Name and telephone number of person responsible for the installation;
   c) Name of the person who first discovered the malfunction and precise time and date that the malfunction was discovered.
   d) Identity of the equipment causing the excess emissions;
   e) Time and duration of the period of excess emissions;
   f) Cause of the excess emissions;
   g) Air pollutants involved;
   h) 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 to the director in writing at least ten days prior to any maintenance, start-up or shutdown activity 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, notice shall be given as soon as practicable prior to the activity.

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. The permittee shall retain the most current operating permit issued to this installation on-site. The permittee shall immediately make such permit available to any Missouri Department of Natural Resources personnel upon request.

**10 CSR 10-6.110 Reporting of Emission Data, Emission Fees and Process Information**
1) The permittee shall submit a Full Emissions Report either electronically via MoEIS, which requires Form 1.0 signed by an authorized company representative, or on Emission Inventory Questionnaire (EIQ) paper forms on the frequency specified in this rule and in accordance with the requirements outlined in this rule. Alternate methods of reporting the emissions, such as spreadsheet file, can be submitted for approval by the director.
2) 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.
3) 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.

**10 CSR 10-6.130 Controlling Emissions During Episodes of High Air Pollution Potential**
This rule specifies the conditions that establish an air pollution alert (yellow/orange/red/purple), or emergency (maroon) and the associated procedures and emission reduction objectives for dealing with each. The permittee shall submit an appropriate emergency plan if required by the Director.

**10 CSR 10-6.150 Circumvention**
The permittee shall not cause or permit the installation or use of any device or any other means which, without resulting in reduction in the total amount of air contaminant emitted, conceals or dilutes an emission or air contaminant which violates a rule of the Missouri Air Conservation Commission.
**10 CSR 10-6.165 Restriction of Emission of Odors**

This requirement is not federally enforceable.

No person may cause, permit or allow the emission of odorous matter in concentrations and frequencies or for durations that odor can be perceived when one volume of odorous air is diluted with seven volumes of odor-free air for two separate trials not less than 15 minutes apart within the period of one hour. This odor evaluation shall be taken at a location outside of the installation’s property boundary.

---

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

**Emission Limitation:**

1) The permittee shall not cause or allow to occur any handling, transporting or storing of any material; construction, repair, cleaning or demolition of a building or its appurtenances; construction or use of a road, driveway or open area; or operation of a commercial or industrial installation without applying reasonable measures as may be required to prevent, or in a manner which allows or may allow, fugitive particulate matter emissions to go beyond the premises of origin in quantities that the particulate matter may be found on surfaces beyond the property line of origin. The nature or origin of the particulate matter shall be determined to a reasonable degree of certainty by a technique proven to be accurate and approved by the director.

2) The permittee shall not cause nor allow to occur any fugitive particulate matter emissions to remain visible in the ambient air beyond the property line of origin.

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

**Monitoring:**

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

The permittee shall maintain the following monitoring schedule:

1) The permittee shall conduct weekly observations for a minimum of eight (8) consecutive weeks after permit issuance.

2) Should no violation of this regulation be observed during this period then-
   a) The permittee may observe once every two (2) weeks for a period of eight (8) weeks.
   b) If a violation is noted, monitoring reverts to weekly.
   c) Should no violation of this regulation be observed during this period then-
      i) The permittee may observe once per month.
      ii) If a violation is noted, monitoring reverts to weekly.

3) If the permittee reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner to the initial monitoring frequency.
**Recordkeeping:**
The permittee shall document all readings on Attachment A, or its equivalent, noting the following:

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

### 10 CSR 10-6.180 Measurement of Emissions of Air Contaminants

1) The director may require any person responsible for the source of emission of air contaminants to make or have made tests to determine the quantity or nature, or both, of emission of air contaminants from the source. The director may specify testing methods to be used in accordance with good professional practice. The director may observe the testing. All tests shall be performed by qualified personnel.

2) The director may conduct tests of emissions of air contaminants from any source. Upon request of the director, the person responsible for the source to be tested shall provide necessary ports in stacks or ducts and other safe and proper sampling and testing facilities, exclusive of instruments and sensing devices as may be necessary for proper determination of the emission of air contaminants.

3) The director shall be given a copy of the test results in writing and signed by the person responsible for the tests.

### 10 CSR 10-6.280 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 at an installation:
   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.
40 CFR Part 82  Protection of Stratospheric Ozone (Title VI)

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 40 CFR §82.106.
   b) The placement of the required warning statement must comply with the requirements of 40 CFR §82.108.
   c) The form of the label bearing the required warning statement must comply with the requirements of 40 CFR §82.110.
   d) No person may modify, remove, or interfere with the required warning statement except as described in 40 CFR §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 of 40 CFR Part 82:
   a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices described in 40 CFR §82.156.
   b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment described in 40 CFR §82.158.
   c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR §82.161.
   d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with the record keeping requirements of 40 CFR §82.166. ("MVAC-like" appliance as defined at 40 CFR §82.152).
   e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to 40 CFR §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 40 CFR §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 contained in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.

5) The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program. Federal Only - 40 CFR Part 82.
V. General Permit Requirements

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

<table>
<thead>
<tr>
<th>10 CSR 10-6.065(6)(C)1.B Permit Duration</th>
</tr>
</thead>
<tbody>
<tr>
<td>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.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>10 CSR 10-6.065(6)(C)1.C General Record Keeping and Reporting Requirements</th>
</tr>
</thead>
<tbody>
<tr>
<td>1) Record Keeping</td>
</tr>
<tr>
<td>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.</td>
</tr>
<tr>
<td>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.</td>
</tr>
<tr>
<td>2) Reporting</td>
</tr>
<tr>
<td>a) All reports shall be submitted to the Air Pollution Control Program, Compliance and Enforcement Section, P. O. Box 176, Jefferson City, MO 65102.</td>
</tr>
<tr>
<td>b) The permittee shall submit a report of all required monitoring by:</td>
</tr>
<tr>
<td>i) October 1st for monitoring which covers the January through June time period, and</td>
</tr>
<tr>
<td>ii) April 1st for monitoring which covers the July through December time period.</td>
</tr>
<tr>
<td>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 exceedences.</td>
</tr>
<tr>
<td>d) Submit supplemental reports as required or as needed. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.</td>
</tr>
<tr>
<td>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.</td>
</tr>
<tr>
<td>ii) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.</td>
</tr>
<tr>
<td>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</td>
</tr>
</tbody>
</table>
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)
If the installation is required to develop and register a risk management plan pursuant to Section 112(R) of the Act, the permittee will verify that it has complied with the requirement to register the plan.

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.

An acid rain permit renewal is being issued along with this operating permit. See permit condition 006 and Attachment F.

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)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, 11201 Renner Blvd., Lenexa, KS 66219, as well as the Air Pollution Control Program, Compliance and 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 applicable 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
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, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, 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, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, 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 APCP shall place a copy with the permit in the public file. Written notice shall be provided to the EPA and the APCP 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 APCP 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 permit, 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 contemporaneous written notice of the change to the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219. This notice shall not be required for changes that are insignificant activities under 10 CSR 10-6.065(6)(B)3 of this rule. 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)34 Responsible Official**

The application utilized in the preparation of this permit was signed by Jamie Kiely, Plant Manager. 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 (MDNR) 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) MDNR or EPA determines that the permit contains a material mistake or that inaccurate statements were made which resulted in establishing the emissions limitation standards or other terms of the permit,

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) MDNR or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.
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 A
Fugitive Emission Observations

<table>
<thead>
<tr>
<th>Date</th>
<th>Time</th>
<th>Visible Emissions</th>
<th>Abnormal Emissions</th>
<th>Corrective Action</th>
<th>Initial</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>No</td>
<td>Yes</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
## Attachment B

Visible Emission Observations

<table>
<thead>
<tr>
<th>Date</th>
<th>Time</th>
<th>Emission Source</th>
<th>Visible Emissions</th>
<th>Excess Emissions</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>No</td>
<td>Cause</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Yes(^1)</td>
<td>Corrective Action</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Initial</td>
</tr>
</tbody>
</table>

\(^1\)If there are visible emissions, the permittee shall complete the excess emissions columns.
## Attachment C

### Method 9 Opacity Emissions Observations

<table>
<thead>
<tr>
<th>Company</th>
<th>Observer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Location</td>
<td>Observer Certification Date</td>
</tr>
<tr>
<td>Date</td>
<td>Emission Unit</td>
</tr>
<tr>
<td>Time</td>
<td>Control Device</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Hour</th>
<th>Minute</th>
<th>Seconds</th>
<th>Steam Plume (check if applicable)</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>0</td>
<td>15</td>
<td>30</td>
</tr>
<tr>
<td>0</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>4</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>5</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>6</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>7</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>8</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>9</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>10</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>11</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>12</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>13</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>14</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>15</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>16</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>17</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>18</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### SUMMARY OF AVERAGE OPACITY

<table>
<thead>
<tr>
<th>Set Number</th>
<th>Time</th>
<th>Opacity</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Start</td>
<td>End</td>
</tr>
</tbody>
</table>

Readings ranged from _________ to _________ % opacity.

Was the emission unit in compliance at the time of evaluation? 

YES  NO  Signature of Observer
Attachment D
Inspection/Maintenance/Repair/Malfunction Log

Emission Unit # ________________________________

<table>
<thead>
<tr>
<th>Date/Time</th>
<th>Inspection/Maintenance Activities</th>
<th>Malfunction Activities</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Malfunction</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
## Attachment E
### Production and Emissions Record

<table>
<thead>
<tr>
<th>Month/Year</th>
<th>Coal Received (tons)</th>
<th>*Emissions (tons)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>3</td>
<td></td>
<td></td>
</tr>
<tr>
<td>4</td>
<td></td>
<td></td>
</tr>
<tr>
<td>5</td>
<td></td>
<td></td>
</tr>
<tr>
<td>6</td>
<td></td>
<td></td>
</tr>
<tr>
<td>7</td>
<td></td>
<td></td>
</tr>
<tr>
<td>8</td>
<td></td>
<td></td>
</tr>
<tr>
<td>9</td>
<td></td>
<td></td>
</tr>
<tr>
<td>10</td>
<td></td>
<td></td>
</tr>
<tr>
<td>11</td>
<td></td>
<td></td>
</tr>
<tr>
<td>12</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

*Emissions = (coal received in tons) X 0.00352 lb/ton ÷ 2,000 lb/ton. The 12-month total emissions must equal 14.9 tons, or less, to maintain compliance.*
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 – Montrose Generating Station
ORIS Code: 2080
Project Number: 2014-05-065
Permit Number: 2 and 3

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 SO2 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 NOx Compliance Plan submitted for this unit, effective for the life of this operating permit. In addition to complying with these NOx limits, this unit shall comply with all other applicable requirements of 40 CFR Part 76, including the requirement to reapply for a NOx 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, 2019, per 40 CFR 72.30, Requirement to apply, and in conjunction with the operating permit renewal application.

JUN 20 2017
Date

Kyra L. Moore
Director or Designee,
Department of Natural Resources
Acid Rain Permit Application

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

This submission is: □ new □ revised □ for Acid Rain permit renewal

**STEP 1**

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

<table>
<thead>
<tr>
<th>Montrose Facility (Source) Name</th>
<th>MO State</th>
<th>2080 Plant Code</th>
</tr>
</thead>
</table>

**STEP 2**

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

<table>
<thead>
<tr>
<th>a Unit ID#</th>
<th>b Unit Will Hold Allowances In Accordance with 40 CFR 72.9(c)(1)</th>
</tr>
</thead>
<tbody>
<tr>
<td>2</td>
<td>Yes</td>
</tr>
<tr>
<td>3</td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td>Yes</td>
</tr>
</tbody>
</table>

□ new □ revised □ for Acid Rain permit renewal
Permit 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.

(1) 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;
(2) 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;
(3) Modifying the Federal Power Act or affecting the authority of the Federal Energy Regulatory Commission under the Federal Power Act; or,
(4) Interfering with or impairing any program for competitive bidding for power supply in a State in which such program is established.

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.

<table>
<thead>
<tr>
<th>Name</th>
<th>Duane Anstaett, D.R.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Signature</td>
<td></td>
</tr>
<tr>
<td>Date</td>
<td>4/9/2019</td>
</tr>
</tbody>
</table>
Acid Rain NOx Compliance Plan

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

This submission is: □ New  ■ Revised

<table>
<thead>
<tr>
<th>Plant Name</th>
<th>State</th>
<th>Plant Code</th>
</tr>
</thead>
<tbody>
<tr>
<td>Montrose</td>
<td>MO</td>
<td>2080</td>
</tr>
</tbody>
</table>

STEP 2

Identify each affected Group 1 and Group 2 boiler using the unit IDs from the current Certificate of Representation covering the facility. Also indicate the 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, and select the compliance option for each unit by making an 'X' in the appropriate row and column.

<table>
<thead>
<tr>
<th>ID# 2</th>
<th>ID# 3</th>
<th>ID# 4</th>
<th>ID# 5</th>
<th>ID# 6</th>
</tr>
</thead>
<tbody>
<tr>
<td>Type</td>
<td>Type</td>
<td>Type</td>
<td>Type</td>
<td>Type</td>
</tr>
</tbody>
</table>

- (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) Standard annual average emission limitation of 0.46 lb/mmBtu (for Phase II dry bottom wall-fired boilers)
- (d) Standard annual average emission limitation of 0.40 lb/mmBtu (for Phase II tangentially fired boilers)
- (e) Standard annual average emission limitation of 0.88 lb/mmBtu (for cell burner boilers)
- (f) Standard annual average emission limitation of 0.86 lb/mmBtu (for cyclone boilers)
- (g) Standard annual average emission limitation of 0.88 lb/mmBtu (for vertically fired boilers)
- (h) Standard annual average emission limitation of 0.84 lb/mmBtu (for wet bottom boilers)

EPA Form 7610-28 (Revised 7-2014)
STEP 2, cont'd

<table>
<thead>
<tr>
<th></th>
<th>ID# 2</th>
<th>ID# 3</th>
<th>ID# Type</th>
<th>ID# Type</th>
<th>ID# Type</th>
<th>ID# Type</th>
</tr>
</thead>
<tbody>
<tr>
<td>i)</td>
<td>NOx Averaging Plan (include NOx Averaging form)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>j)</td>
<td>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)</td>
<td>✓</td>
<td>✓</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>k)</td>
<td>Common stack pursuant to 40 CFR 75.17(a)(2)(iii)(B) with NOx Averaging (check the NOx Averaging Plan box and include NOx Averaging Form)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>l)</td>
<td>EPA-approved common stack apportionment method pursuant to 40 CFR 75.17(a)(2)(ii)(C), (a)(2)(iii)(B), or (b)(2)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

STEP 3: Identify the first calendar year in which this plan will apply.

Renewal

January 1, __________

STEP 4: Read the special provisions and certification, enter the name of the designated representative, sign and date.

Special Provisions

General: This source is subject to the standard requirements in 40 CFR 72.9. These requirements are listed in this source's Acid Rain Permit.

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.

<table>
<thead>
<tr>
<th>Name</th>
<th>Duane Anstaett, D.R.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Signature</td>
<td>Duane Anstaett</td>
</tr>
<tr>
<td>Date</td>
<td>4/19/2019</td>
</tr>
</tbody>
</table>
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 NO\textsubscript{X} Trading Program, 10 CSR 10-6.364 Clean Air Interstate Rule Seasonal NO\textsubscript{X} Trading Program, and 10 CSR 10-6.366, Clean Air Interstate Rule SO\textsubscript{X} Trading Program, the State of Missouri issues this CAIR Permit.

Installation Name: KCP&L – Greater Missouri Operations Co. (Montrose), ORIS Code: 2080
Unit ID: 2 and 3

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 Unit 2 and 3 at Montrose Generating Station, plant 083-0001.

This CAIR permit is being issued in conjunction with this operating permit and is effective for the same period of time as the operating permit. The permittee shall submit an application to renew this CAIR permit in conjunction with the operating permit renewal application.

JUN 20 2017
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

<table>
<thead>
<tr>
<th>Plant Name</th>
<th>State</th>
<th>ORIS/Facility Code</th>
</tr>
</thead>
<tbody>
<tr>
<td>Montrose</td>
<td>MO</td>
<td>2080</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Unit ID#</th>
<th>NOx Annual</th>
<th>SO2</th>
<th>NOx Ozone Season</th>
</tr>
</thead>
<tbody>
<tr>
<td>2</td>
<td>x</td>
<td>x</td>
<td>x</td>
</tr>
<tr>
<td>3</td>
<td>x</td>
<td>x</td>
<td>x</td>
</tr>
</tbody>
</table>

Standard Requirements

(a) Permit Requirements.

1. The CAIR designated representative of each CAIR NOx source, CAIR SO2 source, and CAIR NOx Ozone Season source (as applicable) required to have a title V operating permit and each CAIR NOx unit, CAIR SO2 unit, and CAIR NOx 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 NOx source, CAIR SO2 source, and CAIR NOx Ozone Season source (as applicable) required to have a title V operating permit and each CAIR NOx unit, CAIR SO2 unit, and CAIR NOx 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 III (as applicable) of 40 CFR part 96, the owners and operators of a CAIR NOx source, CAIR SO2 source, and CAIR NOx Ozone Season source (as applicable) that is not otherwise required to have a title V operating permit and each CAIR NOx unit, CAIR SO2 unit, and CAIR NOx 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 NOx source, CAIR SO2 source, and CAIR NOx Ozone Season source (as applicable) and such CAIR NOx unit, CAIR SO2 unit, and CAIR NOx Ozone Season unit (as applicable).
Montrose
Plant Name (from Step 1)

CAIR Permit Application
Page 2

**STEP 3, continued**

(b) Monitoring, recording, and recordkeeping requirements.
(1) The owners and operators, and the CAIR designated representative, of each CAIR NOx source, CAIR SO2 source, and CAIR NOx Ozone Season source (as applicable) and each CAIR NOx unit, CAIR SO2 unit, and CAIR NOx Ozone Season unit (as applicable) at the source shall comply with the monitoring, recording, 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 NOx source, CAIR SO2 source, and CAIR NOx Ozone Season source (as applicable) with the CAIR NOx emissions limitation, CAIR SO2 emissions limitation, and CAIR NOx Ozone Season emissions limitation (as applicable) under paragraph (c) of §6.106, §6.206, and §6.306 (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 NOx source and each CAIR NOx unit at the source shall hold, in the source’s compliance account, CAIR NOx 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 NOx units at the source, as determined in accordance with subpart HHHH of 40 CFR part 96.
(2) A CAIR NOx 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 NOx 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 NOx allowance was allocated.

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

(5) A CAIR NOx allowance is a limited authorization to emit one ton of nitrogen oxides in accordance with the CAIR NOx Allowance Tracking Program. No provision of the CAIR NOx Allowance Tracking 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 NOx allowance does not constitute a property right.

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

Sulfur dioxide emission requirements.
(1) As of the allowance transfer deadline for a control period, the owners and operators of each CAIR SO2 source and each CAIR SO2 unit at the source shall hold, in the source’s compliance account, a tonnage equivalent of CAIR SO2 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 SO2 units at the source, as determined in accordance with subpart HHHH of 40 CFR part 96.
(2) A CAIR SO2 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 SO2 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 SO2 allowance was allocated.

(4) CAIR SO2 allowances shall be held in, deducted from, or transferred into or among CAIR SO2 Allowance Tracking System accounts in accordance with subparts FFFF, GGGG, and IIII of 40 CFR part 96.

(5) A CAIR SO2 allowance is a limited authorization to emit sulfur dioxide in accordance with the CAIR SO2 Trading Program. No provision of the CAIR SO2 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 SO2 allowance does not constitute a property right.

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

Nitrogen oxides ozone season emissions requirements.
(1) As of the allowance transfer deadline for a control period, the owners and operators of each CAIR NOx Ozone Season source and each CAIR NOx Ozone Season unit at the source shall hold, in the source’s compliance account, CAIR NOx 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 NOx Ozone Season units at the source, as determined in accordance with subpart HHHH of 40 CFR part 96.

(2) A CAIR NOx 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 NOx 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 NOx Ozone Season allowance was allocated.

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

(5) A CAIR NOx allowance is a limited authorization to emit one ton of nitrogen oxides in accordance with the CAIR NOx Ozone Season Trading Program. No provision of the CAIR NOx 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 NOx allowance does not constitute a property right.

(7) Upon recordation by the Administrator under subpart FFFF, GGGG, and IIII of 40 CFR part 96, every allocation, transfer, or deduction of a CAIR NOx Ozone Season allowance to or from a CAIR NOx Ozone Season source’s compliance account is incorporated automatically in any CAIR permit of the source.
STEP 3, continued

(d) Excess emissions requirements.
If a CAIR NOx source emits nitrogen oxides during any control period in excess of the CAIR NOx emissions limitation, then:

(1) The owners and operators of the source and each CAIR NOx unit at the source shall surrender the CAIR NOx 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 SO2 source emits sulfur dioxide during any control period in excess of the CAIR SO2 emissions limitation, then:

(1) The owners and operators of the source and each CAIR SO2 unit at the source shall surrender the CAIR SO2 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 NOx Ozone Season source emits nitrogen oxides during any control period in excess of the CAIR NOx Ozone Season emissions limitation, then:

(1) The owners and operators of the source and each CAIR NOx Ozone Season unit at the source shall surrender the CAIR NOx 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 NOx source, CAIR SO2 source, and CAIR NOx Ozone Season source (as applicable) and each CAIR NOx unit, CAIR SO2 unit, and CAIR NOx 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 NOx unit, CAIR SO2 unit, and CAIR NOx 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 NOx Annual Trading Program, CAIR SO2 Trading Program, and CAIR NOx 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 NOx Annual Trading Program, CAIR SO2 Trading Program, and CAIR NOx Ozone Season Trading Program (as applicable) or to demonstrate compliance with the requirements of the CAIR NOx Annual Trading Program, CAIR SO2 Trading Program, and CAIR NOx Ozone Season Trading Program (as applicable).

(2) The CAIR designated representative of a CAIR NOx source, CAIR SO2 source, and CAIR NOx Ozone Season source (as applicable) and each CAIR NOx unit, CAIR SO2 unit, and CAIR NOx Ozone Season unit (as applicable) at the source shall submit the reports required under the CAIR NOx Annual Trading Program, CAIR SO2 Trading Program, and CAIR NOx 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 NOx source, CAIR SO2 source, and CAIR NOx Ozone Season source (as applicable) and each NOx unit, CAIR SO2 unit, and CAIR NOx Ozone Season unit (as applicable) shall meet the requirements of the CAIR NOx Annual Trading Program, CAIR SO2 Trading Program, and CAIR NOx Ozone Season Trading Program (as applicable) that applies to a CAIR NOx source, CAIR SO2 source, and CAIR NOx Ozone Season source (as applicable) or the CAIR designated representative of a CAIR NOx source, CAIR SO2 source, and CAIR NOx Ozone Season source (as applicable) shall also apply to the owners and operators of such source and of the CAIR NOx units, CAIR SO2 units, and CAIR NOx Ozone Season units (as applicable) at the source.

(2) Any provision of the CAIR NOx Annual Trading Program, CAIR SO2 Trading Program, and CAIR NOx Ozone Season Trading Program (as applicable) that applies to a CAIR NOx source, CAIR SO2 source, and CAIR NOx Ozone Season source (as applicable) or the CAIR designated representative of a CAIR NOx source, CAIR SO2 source, and CAIR NOx Ozone Season source (as applicable) shall also apply to the owners and operators of such source and of the CAIR NOx units, CAIR SO2 units, and CAIR NOx Ozone Season units (as applicable) at the source.
(g) Effect on Other Authorities.
No provision of the CAIR NOx Annual Trading Program, CAIR SO2 Trading Program, and CAIR NOx 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 NOx source, CAIR SO2 source, and CAIR NOx Ozone Season source (as applicable) or CAIR NOx unit, CAIR SO2 unit, and CAIR NOx 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.

<table>
<thead>
<tr>
<th>Name</th>
<th>Duane Anstaett, D.R.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Signature</td>
<td>[Signature]</td>
</tr>
<tr>
<td>Date</td>
<td>4-19-2017</td>
</tr>
</tbody>
</table>
STATEMENT OF BASIS

INSTALLATION DESCRIPTION
Kansas City Power & Light - Montrose Generating Station is an electric energy generating station located in Clinton, Missouri. Equipment at the installation includes two coal-fired boilers, coal and fly ash handling equipment, miscellaneous combustion equipment, and storage tanks.

The installation is an existing major source of PM$_{10}$, PM$_{2.5}$, sulfur oxides (SO$_x$), nitrogen oxides (NO$_x$), volatile organic compounds (VOC), carbon monoxide (CO), hazardous air pollutants (HAP), and greenhouse gases. It is on the list of named installations therefore fugitive emissions are included in calculations of PTE for permitting purposes.

<table>
<thead>
<tr>
<th>Reported Air Pollutant Emissions, tons per year</th>
</tr>
</thead>
<tbody>
<tr>
<td>Particulate Matter ≤ Ten Microns (PM$_{10}$)</td>
</tr>
<tr>
<td>Particulate Matter ≤ 2.5 Microns (PM$_{2.5}$)</td>
</tr>
<tr>
<td>Sulfur Oxides (SO$_x$)</td>
</tr>
<tr>
<td>Nitrogen Oxides (NO$_x$)</td>
</tr>
<tr>
<td>Volatile Organic Compounds (VOC)</td>
</tr>
<tr>
<td>Carbon Monoxide (CO)</td>
</tr>
<tr>
<td>Lead (Pb)</td>
</tr>
<tr>
<td>Hazardous Air Pollutants (HAPs)</td>
</tr>
<tr>
<td>Ammonia (NH$_3$)</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Potential to Emit for the Installation$^1$</th>
</tr>
</thead>
<tbody>
<tr>
<td>Pollutant</td>
</tr>
<tr>
<td>CO</td>
</tr>
<tr>
<td>CO$_2$e</td>
</tr>
<tr>
<td>HAP</td>
</tr>
<tr>
<td>NO$_x$</td>
</tr>
<tr>
<td>PM$_{10}$</td>
</tr>
<tr>
<td>PM$_{2.5}$</td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td>-------</td>
</tr>
<tr>
<td>SO\textsubscript{x}</td>
</tr>
<tr>
<td>VOC</td>
</tr>
</tbody>
</table>

\textsuperscript{1}Updated Potential to Emit for the installation was taken from Construction Permit 042016-005 which was issued by the MO Air Pollution Control Program May 8, 2016.

### 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 March 25, 2011;
2) 2015 Emissions Inventory Questionnaire, received April 30, 2016; and
4) Construction Permit 0296-004, Issued January 22, 1996;
5) Construction Permit 042012-003A, Issued July 13, 2012;
6) Construction Permit 042016-005, Issued April 8, 2016;
7) Acid Rain Permit Renewal Application; and
8) CAIR Permit Renewal Application.

### Applicable Requirements Included in the Operating Permit but Not in the Application or Previous Operating Permits

In the operating permit application, the installation indicated they were not subject to the following regulation(s). However, in the review of the application, the agency has determined that the installation is subject to the following regulation(s) for the reasons stated.

None

### Other Air Regulations Determined Not to Apply to the Operating Permit

The Air Pollution Control Program (APCP) has determined the following requirements to not be applicable to this installation at this time for the reasons stated.

10 CSR 10-6.350 \textit{Emission Limitations and Emissions Trading of Nitrogen Oxides}
This rule does not apply because the installation is implementing the requirements of 10 CSR 10-6.364 [10 CSR 10-6.350(1)(F)]

10 CSR 10-6.360 \textit{Control of NO\textsubscript{x} Emissions from Electric Generating Units and Non-Electric Generating Boilers}
This rule does not apply in Henry county therefore it is not applicable to the boilers. [10 CSR 10-6.360(1)(A)]

### Construction Permits

1. Construction Permit #0296-004, Issued January 22, 1996
   This permit authorized the construction of the Rotary Coal Car Dumper and Rotary Coal Car Dumper Conveyor. This construction permit contains special conditions which appear in this operating permit.
2. Construction Permit #0699-008, Issued June 1, 1999
   This permit authorized the construction of an emergency generator. This permit contains no special conditions and the emergency generator was replaced by a new generator in 2008.
3. No Construction Permit Required Determination Project #2008-03-029, Completed May 2, 2008
This no construction permit required determination was made for the replacement of the old emergency generator with a new 47 horsepower unit.

This no construction permit required determination was made for the installation of a 300,000 gallon fuel tank which replaced the old 1,000,000 gallon tank.

5. No Construction Permit Required Determination Project #2011-04-005, Completed April 13, 2011
This no construction permit required determination was made for the expansion of the site’s utility waste landfill.

6. Construction Permit #042012-003, Issued April 9, 2012
Construction Permit #042012-003A, Issued July 13, 2012
This permit was issued for the replacement of the burner nozzle tips, linkage components, and removable front panels with redesigned components and installation of an automated separated over-fire air (SOFA) system, including necessary drivers, wind boxes, dampers, and instrumentation for the coal fired boilers.

Construction Permit #042012-003A contains special conditions which supersede all special conditions from Construction Permit #042012-003 and are found in this operating permit.

7. Construction Permit 042016-005, Issued April 8, 2016
This permit was issued to authorize the construction of activated carbon injection and flue gas conditioning at Boilers 2 and 3 in order to comply with 40 CFR Part 63 Subpart UUUUU.

**New Source Performance Standards (NSPS) Applicability**

40 CFR Part 60 Subpart D, *Standards of Performance for Fossil-Fuel-Fired Steam Generators for Which Construction is Commenced After August 17, 1971*

40 CFR Part 60 Subpart Da, *Standards of Performance for Electric Utility Steam Generating Units for Which Construction is Commenced After September 18, 1978*

40 CFR Part 60 Subpart Db, *Standards of Performance for Industrial, Commercial, Institutional Steam Generating Units for Which Construction is Commenced After June 19, 1984*

These subparts do not apply to this installation because the boilers were constructed prior to the subparts’ applicability dates.

40 CFR Part 60 Subpart Dc, *Standards of Performance for Small Industrial, Commercial, Institutional Steam Generating Units*

This regulation does not apply to this installation’s boilers, because they each have a maximum design heat input capacity greater than 100 MMBtu/hr.


These regulations apply to storage vessels with capacities greater than 40,000 gallons that are used to store petroleum liquids and were constructed, reconstructed, or modified after certain applicability dates. These regulations do not apply to the 300,000 gallon fuel oil storage tank (EP05) or to the two 45,000 gallon fuel storage tanks (EP06 and EP07).
gallon fuel oil storage tanks, because they were outside of the subparts’ applicability dates. These regulations do not apply to the other petroleum liquid storage tanks, because they do not have capacities that greater than 40,000 gallons.

This subpart applies to storage vessels with capacities greater than or equal to 75 m$^3$ (19,813 gallons) that are used to store volatile organic liquids and were constructed after July 23, 1984.

The only such tank at the installation is the 300,000 gallon diesel storage tank installed in 2008. However, §60.110b(b) states that this subpart does not apply to storage vessels with a capacity greater than or equal to 151 m$^3$ (39,890 gallons) storing a liquid with a maximum true vapor pressure less than 3.5 kilopascals (kPa). Therefore, this regulation does not apply to the storage tank (EP05) because the capacity of the storage tank is 300,000 gallons, and the maximum true vapor pressure of diesel fuel is well below 3.5 kPa.

40 CFR Part 60 Subpart Y, Standards of Performance for Coal Preparation Plants
This regulation applies to thermal dryers, pneumatic coal-cleaning equipment (air tables), coal processing and conveying equipment (including breakers and crushers), coal storage systems, and coal transfer and loading systems constructed after October 24, 1974 at a coal preparation plant.

a) The definition of “coal processing and conveying equipment” in this regulation is “machinery used to reduce the size of coal or to separate coal from refuse, and the equipment used to convey coal to or remove coal and refuse from the machinery.” The Rotary Coal Car Dumper and Rotary Coal Car Dumper Conveyor (EP01) do not meet this definition, because the coal goes only to coal storage piles. Therefore this regulation does not apply to them.

b) The Coal Transfer and Conveying (EP03) was constructed prior to October 24, 1974, the subpart’s applicability date. Therefore this regulation does not apply to this equipment.

40 CFR Part 60 Subpart IIII, Standards of Performance for Stationary Compression Ignition Internal Combustion Engines
This rule applies to owners of compression ignition (CI) engines that were manufactured after April 1, 2006 for non-fire pump engines and after July 1, 2006 for fire pump engine. The fire pump engine (EP19) is not subject to this rule because it was manufactured in 1993. This rule does apply to the emergency generator engine (EP64) because it was manufactured in 2008. The conditions of this rule have been applied to the emergency generator in this operating permit.

Maximum Achievable Control Technology (MACT) Applicability
This rule applies to the fire pump engine (EP19) and the emergency generator engine (EP65) installed in 1999. These units are subject to the requirements for existing emergency CI RICE located at a major source of HAP. No notifications are required as the units are not subject to any numerical emission standards. [§63.6645(a)(5)]
The emergency generator engine (EP64) installed in 2008 meets the requirements of this rule by meeting the requirements of 40 CFR Part 60 Subpart IIII. [§63.6590(c)(6)]

This rule is applicable to the installation and it has been applied to Boilers 2 and 3 (EP07 and EP08).

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability
40 CFR Part 61, Subpart M – National Emission Standards for Asbestos
is applicable to the installation and has been applied within this permit (see Section IV. Core Permit Requirements).

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

40 CFR Part 64 is not applicable to the installation and has not been applied in this permit. In previous operating permits, CAM has been applied to Boilers 1-3 to demonstrate compliance with the PM limit in 10 CSR 10-6.405 (Note: Boiler 1 has been removed from service). The PM limit in MACT UUUUU is more stringent than the PM limit in 10 CSR 10-6.405; therefore, only the PM limit in MACT UUUUU has been applied in this permit. CAM does not apply to MACT UUUUU as §64.2(b)(1)(i) exempts limitations or standards proposed by the Administrator after November 15, 1990 pursuant to §111 or §112 of the Act.

Greenhouse Gas Emissions
This installation is a major source for greenhouse gases. Major stationary sources are required by the Clean Air Act (CAA) to obtain Part 70 operating permits. While Part 70 permits generally do not establish new emissions limits, they consolidate applicable requirements, as defined in Missouri State Regulations 10 CSR 10-6.020(2)(A)23, into a comprehensive air permit. At the time of permit issuance, there were no applicable GHG requirements for this source.

Note that this source is subject to the Greenhouse Gas Reporting Rule. However, the preamble of the GHG Reporting Rule clarifies that Part 98 requirements do not have to be incorporated in Part 70 permits operating permits at this time. In addition, Missouri regulations do not require the installation to report CO₂ emissions in their Missouri Emissions Inventory Questionnaire; therefore, the installation’s CO₂ emissions were not included within this permit. An estimate of CO₂ emissions are included below. The applicant is required to report the data directly to EPA. The public may obtain CO₂ emissions data for this installation by visiting EPA’s Clean Air Markets website at: http://camdataandmaps.epa.gov/gdm/index.cfm.

Other Regulatory Determinations
10 CSR 10-6.220, Restriction of Emission of Visible Air Contaminants
This regulation does not apply to the emergency fire pump engine (EP19) or the emergency generator (EP64) because they are internal combustion engines. [10 CSR 10-6.220(1)(A)]

The previous permit only required semi-annual opacity observations for the rotary coal dumper and conveyor (EP01). Current policy requires monthly observations for this rule. If KCP&L is conducting semi-annual observations at the time this permit is issued they may begin monthly observations.

This regulation does not apply to Boilers 2 and 3 as emission sources regulated by MACT UUUUUU and demonstrating compliance with a PM CEMS are exempt per 10 CSR 10-6.220(1)(N).

The previous permit only required semi-annual opacity observations for the rotary coal dumper and conveyor (EP01). Current policy requires monthly observations for this rule. If KCP&L is conducting semi-annual observations at the time this permit is issued they may begin monthly observations.

10 CSR 10-6.260, *Restriction of Emissions of Sulfur Compounds*  
10 CSR 10-6.261, *Control of Sulfur Dioxide Emissions*  
These rules apply to the coal fired boilers (EP07 and EP08) and the emergency fire pump engine (EP19). They do not apply to the emergency generator engine (EP64) because it is subject to sulfur limitations under 10 CSR 10-6.070. [10 CSR 10-6.260(1)(A)1] 
These rules do not apply to any of the coal conveying or unloading equipment because they are not sources of sulfur emissions.

10 CSR 10-6.260 was rescinded from the Missouri Code of State Regulations Rules on November 30, 2015, however it has not been removed from the State Implementation Plan (SIP) as of the issuance of this operating permit. This rule will remain in the operating permit until it is removed from the SIP. During this time it will be a federally enforceable condition only.

10 CSR 10-6.400, *Restriction of Emission of Particulate Matter from Industrial Processes*  
The following emission units are not subject to this rule because, per §(1)(B)7, it does not apply to fugitive emissions.  
   Coal storage piles (EP02)  
   Fly ash unloading to open storage pile (EP12)  
   Fly ash pile maintenance activities (EP13)  
   Haul Roads (EP14)  
The following emission units are not subject to this rule because, per §(1)(B)12, it does not apply to the grinding, crushing and conveying operations at a power plant.  
   Rotary coal car dumper and conveyor (EP01)  
   Coal transfer and conveying (EP03)  
The following emission units are not subject to this rule because, per §(1)(B)6, it does not apply to the burning of fuel for indirect heating.  
   Boiler #2 (EP07)  
   Boiler #3 (EP08)  
The following emission units are not subject to this rule because, per §(2)(A), liquids and gases used solely as fuels for purposes of combustion are excluded from the definition of process weight.  
   Emergency Fire Pump Engine(EP19)  
   Emergency Generator (EP64)
10 CSR 10-6.405 *Restriction of PM Emissions From Fuel Burning Equipment Used For Indirect Heating* is applicable to the installation, but has not been applied within this permit. This regulation would apply a 0.21 lb/MMBtu filterable PM annual average standard to Boilers 2 and 3. This is based on the equation for existing installations in the outstate area with a maximum heat input capacity between 10 and 10,000 MMBtu/hr, \( E = 0.90Q^{0.174} \). The 0.21 lb/MMBtu filterable PM annual average limit is less stringent than the 0.03 lb/MMBtu filterable PM 30-day rolling average limit for Boilers 1 and 2 in MACT UUUUU; therefore, only the more stringent standard has been applied in this permit.

**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 APCP's satisfaction, the installation's compliance with that regulation(s). If the installation is not in compliance with a regulation which was not previously cited, the installation shall submit to the APCP a schedule for achieving compliance for that regulation(s).
Response to Public Comments

The draft Part 70 Operating Permit for KCP&L Montrose Generating Station (083-0001) was placed on public notice as of April 14, 2017 for a 30-day comment period. The public notice was published on the Department of Natural Resources’ Air Pollution Control Program’s web page at: http://www.dnr.mo.gov/env/apcp/PermitPublicNotices.htm. On May 2, 2017 the Air Pollution Control Program received comments from Mark Smith, EPA Region 7. The comments are addressed below in the order in which they appear within the letter.

**************************************************

Comment #1: In Permit Condition 005, MDNR incorporates applicable requirements from 40 CFR Part 63, Subpart UUUUU-National Emission Standards for Hazardous Air Pollutants: Coal- and Oil-Fired Electric Utility Steam Generating Units; that apply to Boiler #2 (emission unit EP07) and Boiler #3 (emission unit EP08). It appears that MDNR is attempting to incorporate the requirements by reference (IBR). While EPA supports and encourages the use of IBR, there is value to be gained by a source and the permit writer studying specific requirements and standards, culling out those that apply to a source and translating them in a logical fashion as operating permit conditions. It is EPA's guidance to MDNR that all emission limits, monitoring, record keeping and compliance determination methods, the permittee has selected for their use, be clearly incorporated into the permit condition(s). Normally, EPA recommends that notification, reporting and test methods and procedures may continue to be IBR. In Permit Condition 005, MDNR presents what appears to be a combination approach of IBR and specific requirements for the KCP&L-Montrose Boilers #2 and #3. The requirements presented in the compliance dates; emission limitations and work practice standards; general requirements; and testing and initial compliance sections of Permit Condition 005, appear to be written for activities that are to occur in the future whereas, the requirements presented in the Continuous Compliance; Notifications and General Provisions; and the Record keeping and Reporting sections refer the permittee to various appropriate paragraphs in the Code of Federal Regulations (CFR). However, based on KCP&L-Montrose's Notification of Compliance Status, dated September 8, 2016, KCP&L-Montrose achieved their compliance date of April 2016; they have completed their initial performance testing; and have established their emission limits and work practice standards. Therefore, EPA suggests that MDNR consider what be a more accurate and practical approach to presenting the requirements associated with 40 CFR Part 63 Subpart UUUUU and incorporate KCP&L-Montrose's actual established approach, as reported in their compliance notification, in lieu of the compilation of regulatory alternatives afforded by the standard.

Response to Comment: The permittee has chosen to comply with the PM, HCl and Mercury emission limits options from Table 2 to 40 CFR Part 63 Subpart UUUUU, therefore these are the emission limitations that are included in permit condition 005. The optional emission limitations for total non-Hg HAP metals or individual HAP metals (in lieu of particulate matter) and sulfur dioxide (in lieu of HCl) have been removed from the permit condition. Furthermore, initial compliance testing requirements have been removed from the permit condition as these requirements have already been fulfilled.
Comment #2: Permit Condition 001 incorporates the special condition from Permit to Construct #0296-004 and requires KCP&L-Montrose to limit the particulate matter emissions from the coal receiving, conveying and slacking operation to no more than 14.9 tons in any consecutive 12-month period. Permit Condition 001, also requires the use of Attachment E, or equivalent, for determining compliance with this emission limit. However, Attachment E requires the use of an unreferenced emission factor which might mean the attachment may not be enforceable from a practical matter. EPA suggests MDNR consider including a reference of the emission factor.

Response to Comment: The emission factor for calculating PM$_{10}$ emissions for compliance with the emission limit in construction permit #0296-004 was determined at the time of construction permit review. This is explained in the construction permit and stated to be from EPA’s AP-42 section 1.2.3-3. The resulting emission factor was 0.00088 pounds per ton per drop point. There are four drop points associated with the coal transport and storage system therefore the emission factor provided in the attachment for construction permit #0296-004 is 4 x 0.00088 = 0.00352 lb/ton.
JUN 2 0 2017

Mr. Stephen Courtney
Kansas City Power & Light Company
P.O. Box 418679
Kansas City, MO 64141

Re: Kansas City Power & Light Company, 083-0001
Permit Number: OP2017-047

Dear Mr. Courtney:

Enclosed with this letter is your Part 70 operating permit. Please review this document carefully. Operation of your installation in accordance with the rules and regulations cited in this document is necessary for continued compliance. It is very important that you read and understand the requirements contained in your permit.

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

You may appeal this permit to the Administrative Hearing Commission (AHC), P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.078.16 and 621.250.3. If you choose to appeal, you must file a petition with the AHC within thirty 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 contact the Air Pollution Control Program (APCP) at (573) 751-4817, or you may write to the Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

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

MJS:jwj

Enclosures

c: PAMS File: 2011-03-080

Recycled paper