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: OP2018-010
Expiration Date: FEB 07 2023
Installation ID: 069-0063
Project Number: 2011-04-043

Installation Name and Address
Kennett Generating Plant
401 South Anthony Street
Kennett, MO 63857
Dunklin County

Parent Company's Name and Address
City Light Gas and Water
P.O. Box 40
Kennett MO, 63857

Installation Description:
Kennett Generating Plant produces electricity for the surrounding community. The installation generates electricity through four (4) diesel generators and seven (7) diesel/dual-fuel generators ranging from 600 to 8725 horsepower and two (2) 4-stroke lean-burn reciprocating engines using natural gas. A 500,000-gallon petroleum storage tank and two (2) lubricating oil storage tanks (2,600 and 1,300 gallons each) are also located on the 12.6-acre site. The facility is major source of NOx.

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

Director or Designee
Department of Natural Resources

FEB 07 2018
Effective Date
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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>
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<td>EP01</td>
<td>Engine #3: 1200 hp diesel only generator; installed 1945</td>
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<td>EP01/04</td>
<td>Engine #4: 3500 hp diesel/natural gas generator; Installed 1955</td>
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<td>Engine #5: 2000 hp diesel only generator; Installed 1949</td>
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<td>Engine #11: 8725 hp diesel/natural gas generator; Installed 1975</td>
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</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>Emission Unit</th>
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<tbody>
<tr>
<td>EP12</td>
<td>500,000 gallon diesel storage tank; Installed 1973</td>
</tr>
<tr>
<td>EP17</td>
<td>Eight (8) natural gas fired space heaters</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 Specific Limitations.

**Monitoring:**
The permittee shall calibrate, maintain and operate all pollution control devices and pollution monitoring related instruments according to the manufacturer’s recommendations, or maintenance and operational history of similar units. All calibrations, maintenance, and operations shall occur according to good engineering practices. All manufacturing specifications and operational/maintenance histories shall be kept on site.

**Recordkeeping:**
1. The permittee shall record all required record keeping in an appropriate format.
2. Records may be kept electronically using database or workbook systems, as long as all required information is readily available for compliance determinations.
3. The permittee shall keep a copy of this operating permit and review, copies of all issued construction permits and reviews, and copies of all Safety Data Sheets (SDS) on site.
4. All records must be kept for a minimum of 5 years and be made available to Department personnel upon request.

**Reporting:**
1. The permittee shall report any exceedance of any of the terms imposed by this permit, or any malfunction which could cause an exceedance of any of the terms imposed by this permit, no later than ten days after the exceedance or event causing the exceedance (unless otherwise specified in the specific condition).
2. The permittee shall report any deviations from the monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and annual compliance certification.
3. All reports and certifications shall be submitted to the Air Pollution Control Program’s Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102.

<table>
<thead>
<tr>
<th>PERMIT CONDITION PW001</th>
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<tbody>
<tr>
<td>10 CSR 10-6.360 Control of NOx Emissions From Electric Generating Units &amp; Non-electric Generating Boilers</td>
</tr>
<tr>
<td>Conditional Exemption</td>
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</tbody>
</table>

**Operational Limitation:**
The permittee shall only burn natural gas or fuel oil in all emission units located at this installation in order to qualify for the exemption under 10 CSR 10-6.360(1)(C)1.

**Monitoring/Recordkeeping:**
The permittee shall maintain documentation that the only fuel used is natural gas and/or fuel oil.
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.

**PERMIT CONDITION 1**
10 CSR 10-6.060 Construction Permits Required
Construction Permit 122000-007, Issued December 22, 2000

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<th>Emission Unit</th>
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<tr>
<td>EP15</td>
<td>Engine #12: 8800 hp natural gas generator; MHDR = 57.71 MMBtu/hr; Installed 2001; Controlled with Catalytic Converter</td>
</tr>
<tr>
<td>EP16</td>
<td>Engine #13: 8800 hp natural gas generator; MHDR = 57.71 MMBtu/hr; Installed 2001; Controlled with Catalytic Converter</td>
</tr>
</tbody>
</table>

**Emission Limitation:**
2. Special Condition 1.B: The permittee shall not emit formaldehyde from the two reciprocating engines in excess of ten (10) tons in any consecutive 12-month period.

**Operational Limitation:**
Special Condition 4: Control of carbon monoxide (CO) shall be maintained at all times when the two reciprocating engines are in operation.

**Monitoring/Recordkeeping:**
Special Condition 1.C: The permittee shall maintain the sum of the most recent consecutive 12-month records of the NOx and formaldehyde emissions from the two reciprocating engines. Attachments B and C or equivalent forms shall be used to demonstrate compliance with these requirements.

**PERMIT CONDITION 2**
10 CSR 10-6.350 Emission Limitations and Emissions Trading of Oxides of Nitrogen

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</table>
EP01/04 | Engine #10: 8725 hp diesel/natural gas generator; Installed 1973
EP01/04 | Engine #11: 8725 hp diesel/natural gas generator; Installed 1975

**Emission Limitations:**

1. **Low Emitter Exemption:** In order to qualify for the exemption under 10 CSR 10-6.350(1)(B)1., the permittee shall not emit more than 25 tons of NOx from any of the listed emission units during the control period.
   a) Any gas- or oil-fired unit that qualifies for the low-emitter exemption in paragraph (1)(B)1. shall install and operate a non-resettable hour meter or determine the hours of operation for each emission unit during the control period.

2. **Loss of Exemption:** If the exemption limit is exceeded, the exemption shall not apply and the permittee must notify the staff Director or designee that the exemption limit was exceeded within 30 days.

**Monitoring/Recordkeeping:**

1. The permittee shall maintain a rolling total of NOx emissions during the control period (May 1 of a calendar year through September 30 of the same calendar year) for each unit.
2. The permittee shall use Attachment D to record the amount of NOx emitted from each unit during the control period.

PERMIT CONDITION 3

10 CSR 10-6.390 Emission Limitations and Emissions Trading of Oxides of Nitrogen

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**Emission Limitations:**

The permittee shall not operate Engine #12 and Engine #13 to exceed the NOx emission rate of 3.0 grams per horsepower-hour.

**Monitoring:**

The facility was granted a variance from the monitoring requirements of this rule. A copy of the variance is included with this operating permit as Attachment E.

**Recordkeeping/Reporting:**

1. The permittee shall submit to the Director the identification number and type of each unit subject to this rule, the name and address of the plant where the unit is located, and the name and telephone number of the person responsible for demonstrating compliance with this rule.
2. The permittee shall submit an annual report documenting for each unit the total NOx emissions from May 1 through September 30 of each year to the Director by November 1 of that year.
3. The permittee shall maintain all records necessary to demonstrate compliance with this rule for a period of five years at the plant which the units are located. The permittee shall maintain records of the following information for each day of the control period the units are operated:
a) The identification of each unit and the name and address of the plant where the unit is located for each unit;
b) The calendar date of record;
c) The number of hours the unit is operated during each day including start-ups, shutdowns, malfunctions and the type and duration of maintenance and repair;
d) The date and results of each emissions inspection;
e) A summary of any emissions corrective maintenance taken; and
f) The results of all compliance tests.

PERMIT CONDITION 4
10 CSR 10-6.075 Maximum Achievable Control Technology Regulations

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<td>Engine #7: 3500 hp diesel/natural gas generator; Installed 1960</td>
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Applicability:
Existing emergency stationary RICE with greater than 500 brake HP located at a major source of HAP emissions that does not operate or is not contractually obligated to be available for more than 15 hours per calendar year for the purposes specified in §63.6640(f)(2)(ii) and (iii) are not subject to this subpart. The stationary RICE must meet the definition of an emergency stationary RICE in §63.6675, which includes operating according to the provisions specified in §63.6640(f). [§63.6590(b)(3)(iii)]

Definition of an emergency stationary RICE [§63.6675]
Emergency stationary RICE means any stationary reciprocating internal combustion engine that meets all of the criteria in paragraphs (1) through (3) of this definition. All emergency stationary RICE must comply with the requirements specified in §63.6640(f) in order to be considered emergency stationary RICE. If the engine does not comply with the requirements specified in §63.6640(f), then it is not considered to be an emergency stationary RICE under this subpart.
1. The stationary RICE is operated to provide electrical power or mechanical work during an emergency situation. Examples include stationary RICE used to produce power for critical networks or equipment (including power supplied to portions of a facility) when electric power from the local utility (or the normal power source, if the facility runs on its own power production) is interrupted, or stationary RICE used to pump water in the case of fire or flood, etc.
2. The stationary RICE is operated under limited circumstances for situations not included in paragraph (1) of this definition, as specified in §63.6640(f).
3. The stationary RICE operates as part of a financial arrangement with another entity in situations not included in paragraph (1) of this definition only as allowed in §63.6640(f)(4)(i) or (ii).
Operational Limitations [§63.6640(f)]:
The permittee must operate the emergency stationary RICE according to the requirements in §63.6640(f). In order for the engine to be considered an emergency stationary RICE under this subpart, 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), is prohibited. If you do not operate the engine according to the requirements in §63.6640(f), the engine will not be considered an emergency engine under this subpart and must meet all requirements for non-emergency engines.

1. There is no time limit on the use of emergency stationary RICE in emergency situations.
2. The permittee may operate your emergency stationary RICE for any combination of the 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 §63.6640(f)(2).
   a) 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.
3. Emergency stationary RICE 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 provided in §63.6640(f)(2). Except as provided in §63.6640(f)(4)(i), the 50 hours per year for non-emergency situations cannot be used for peak shaving, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

PERMIT CONDITION 5

10 CSR 10-6.075 Maximum Achievable Control Technology Regulations

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<td>Engine #10: 8725 hp diesel/natural gas generator; 2 stroke; Installed 1973</td>
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<td>EP01/04</td>
<td>Engine #11: 8725 hp diesel/natural gas generator; 2 stroke; Installed 1975</td>
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</table>

Applicability:
Existing limited use stationary RICE with greater than 500 brake HP located at a major source of HAP emissions are not subject to this subpart. The stationary RICE must meet the definition of a limited use stationary RICE in §63.6675, which limits the engines to less than 100 hours per year of operation. [§63.6590(b)(3)(iv)]
Monitoring/Recordkeeping:
The permittee shall record the hours of operation of Engines #8-#11 each calendar year to demonstrate that the units are being operated as limited use units.

PERMIT CONDITION 6
10 CSR 10-6.261 Control of Sulfur Dioxide Emissions

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Emission Limitation:
1. The fuel sulfur content for Engines 1 through 9 (existing units) shall not contain more than 35,249 parts per million (ppmv) of sulfur content for distillate fuel.
2. The fuel sulfur content for Engines 10 and 11 (existing units) 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, fuel sampling and analysis, performance tests, continuous emission monitoring, 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 maintain a record of data, calculations, results, records and reports from any performance test, continuous emission monitoring, fuel deliveries, and/or fuel sampling tests.
3. 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.
4. The permittee of sources using fuel sampling and analysis for compliance must also follow the requirements in 10 CSR 10-6.261(5)(D).

\(^1\)This regulation has not yet been adopted into Missouri’s SIP; therefore, this regulation is a state only requirement. Upon adoption into Missouri’s SIP, this regulation will be both a state and federal requirement
5. The permittee of sources using performance testing for compliance must also follow the requirements in 10 CSR 10-6.261(5)(A).

6. 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.

7. The permittee must furnish the Director all data necessary to determine compliance status.

**PERMIT CONDITION 7**

10 CSR 10-6.260 Restriction of Emission of Sulfur Compounds

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**Emission Limitations:**

1. The permittee shall not cause or permit the emission of gases into the atmosphere containing more than two thousand parts per million by volume (2000 ppmv) of sulfur dioxide or more than seventy milligrams per cubic meter (70 mg/cubic meter) of sulfuric acid or sulfur trioxide or any combination of those gases averaged on any consecutive three (3)-hour time period from existing sources (Engines 1 through 9).

2. The permittee shall not cause or permit the emission of gases into the atmosphere containing more than five hundred parts per million by volume (500 ppmv) of sulfur dioxide or more than thirty-five milligrams per cubic meter (35 mg/cubic meter) of sulfuric acid or sulfur trioxide or any combination of those gases averaged on any consecutive three (3)-hour time period from new sources (Engines 10 and 11).

**Monitoring/Recordkeeping:**

Compliance with Permit Condition 6 - As required by Permit Condition 6.

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This regulation was rescinded by the State of Missouri on November 30, 2015. The regulation remains in this operating permit as it is contained in Missouri’s SIP and remains an applicable federal requirement. This is a federal only requirement. This permit condition will no longer be applicable when EPA takes final action to incorporate 10 CSR 10-6.261 in Missouri's SIP in place of 10 CSR 10-6.260. No action is required on the part of the permittee to remove this permit condition from this operating permit upon the removal of 10 CSR 10-6.260 from the Missouri SIP.
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 is a State Only permit requirement.

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 (Issuance of this renewal does not restart this 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,

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. If a timely and complete application for a permit renewal is submitted, but the Air Pollution Control Program fails to take final action to issue or deny the renewal permit before the end of the term of this permit, this permit shall not expire until the renewal permit is issued or denied.

10 CSR 10-6.065(6)(C)1.C General Record Keeping and Reporting Requirements
1. Record Keeping
   a) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
   b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any Missouri Department of Natural Resources’ personnel upon request.

2. Reporting
   a) All reports shall be submitted to the Air Pollution Control Program, Compliance and Enforcement Section, P. O. Box 176, Jefferson City, MO 65102.
   b) The permittee shall submit a report of all required monitoring by:
      i) October 1st for monitoring which covers the January through June time period, and
      ii) April 1st for monitoring which covers the July through December time period.
   c) Each report shall identify any deviations from emission limitations, monitoring, record keeping, reporting, or any other requirements of the permit, this includes deviations or Part 64 exceedances.
   d) Submit supplemental reports as required or as needed. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
      i) Notice of any deviation resulting from an emergency (or upset) condition as defined in paragraph (6)(C)7.A of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two working days after the date on which the emission limitation is exceeded due to the emergency, if the permittee wishes to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and the permittee can identify the cause(s) of the emergency. The permitted installation must show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or requirements in the permit. The notice must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.
      ii) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.
iii) Any other deviations identified in the permit as requiring more frequent reporting than the permittee's semiannual report shall be reported on the schedule specified in this permit, and no later than ten days after any exceedance of any applicable rule, regulation, or other restriction.

e) Every report submitted shall be certified by the responsible official, except that, if a report of a deviation must be submitted within ten days after the deviation, the report may be submitted without a certification if the report is resubmitted with an appropriate certification within ten days after that, together with any corrected or supplemental information required concerning the deviation.

f) The permittee may request confidential treatment of information submitted in any report of deviation.

10 CSR 10-6.065(6)(C)1.D Risk Management Plan Under Section 112(r)
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.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)1.1 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 shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emissions limitations. To establish an emergency- or upset-based defense, the permittee must demonstrate, through properly signed, contemporaneous operating logs or other relevant evidence, the following:
   a) That an emergency or upset occurred and that the permittee can identify the source of the emergency or upset,
   b) That the installation was being operated properly,
   c) That the permittee took all reasonable steps to minimize emissions that exceeded technology-based emissions limitations or requirements in this permit, and
   d) That the permittee submitted notice of the emergency to the Air Pollution Control Program within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.

2. Be aware that an emergency or upset shall not include noncompliance caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

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

An installation that has been issued a Part 70 operating permit is not required to apply for or obtain a permit revision in order to make any of the changes to the permitted installation described below if the changes are not Title I modifications, the changes do not cause emissions to exceed emissions allowable under the permit, and the changes do not result in the emission of any air contaminant not previously emitted. The permittee shall notify the Air Pollution Control Program, 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 Allen Jones, 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 shall 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.

### 10 CSR 10-6.065(6)(E)1.C Statement of Basis

This permit is accompanied by a statement setting forth the legal and factual basis for the permit conditions (including references to applicable statutory or regulatory provisions). This Statement of Basis, while referenced by the permit, is not an actual part of the permit.

### VI. Attachments

Attachments follow.
## Attachment A
Fugitive Emission Observations

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<th>Date</th>
<th>Time</th>
<th>Visible Emissions</th>
<th>Beyond Boundary</th>
<th>If visible emissions are present</th>
<th>Cause</th>
<th>Corrective Action</th>
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</tbody>
</table>
### Attachment B
Formaldehyde Emissions Tracking Record

<table>
<thead>
<tr>
<th>Month</th>
<th>Column 1 Amount of natural gas burned (MMCF)</th>
<th>Column 2 Formaldehyde Emission Factor (lb/MMCF)</th>
<th>Column 3 Monthly Formaldehyde Emissions (tons)</th>
<th>Column 4 12-month Formaldehyde Emissions (tons)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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</tbody>
</table>

Column 1 = Amount of natural gas burned during the month in unis EP15 and EP16
Column 2 = Emission factor for E15 and EP16 determined from stack tests performed on October 2, 2001.
Engine 15: 4.2 lb/MMCF; Engine 16: 9.9 lb/MMCF
Column 3 = Column 1 x Column 2 ÷ 2000
Column 4 = Sum of current month’s and previous 11 month’s formaldehyde emissions (must be below 10 tons to indicate compliance) Monthly totals must include all emissions from startup, shutdown and malfunction.
## Attachment C
Monthly NOx Emissions Tracking Record

<table>
<thead>
<tr>
<th>Month</th>
<th>Column 1</th>
<th>Column 2</th>
<th>Column 3</th>
<th>Column 4</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Monthly Amount of NG burned (MMCF)</td>
<td>NOx Emission Factor (lb/MMCF)</td>
<td>Monthly NOx Emissions (tons)</td>
<td>12-month NOx Emissions (tons/year)</td>
</tr>
</tbody>
</table>

Column 3: Monthly NOx emission = Column 1 x Column 2 ÷ 2000
Column 4: Sum of the current month NOx emissions and the previous 11 month NOx emissions. Total emissions less than 40.0 tons indicate compliance.

**Monthly totals must include all emissions from startup, shutdown and malfunction.**
**Attachment D**

Monthly NOx Emissions Tracking Record

This record keeping sheet is for the period May 1 through September 30 in the year ____________

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th><strong>Column 1</strong> Amount of fuel burned during control period (Mgal) or hours operated while in dual fuel mode (amount natural gas burned MMCF for Engines 12 and 13)</th>
<th>Fuel Burned</th>
<th><strong>Column 2</strong> NOx Emission Factor</th>
<th><strong>Column 3</strong> NOx Emissions during control period (tons)</th>
<th><strong>Column 4</strong> Total NOx Emissions for the Emission Unit during the control period (tons)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Engine 1</td>
<td>Diesel</td>
<td>604 lb/Mgal</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Engine 2</td>
<td>Diesel</td>
<td>604 lb/Mgal</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Engine 3</td>
<td>Diesel</td>
<td>438.5 lb/Mgal</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Engine 4</td>
<td>Diesel, Dual Fuel</td>
<td>438.5 lb/Mgal</td>
<td>18 lb/1000 HP</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Engine 5</td>
<td>Diesel</td>
<td>438.5 lb/Mgal</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Engine 6</td>
<td>Diesel, Dual Fuel</td>
<td>438.5 lb/Mgal</td>
<td>18 lb/1000 HP</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Engine 7</td>
<td>Diesel</td>
<td>438.5 lb/Mgal</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Engine 8</td>
<td>Diesel, Dual Fuel</td>
<td>438.5 lb/Mgal</td>
<td>18 lb/1000 HP</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Engine 9</td>
<td>Diesel</td>
<td>438.5 lb/Mgal</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Engine 10</td>
<td>Diesel</td>
<td>438.5 lb/Mgal</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Engine 11</td>
<td>Diesel</td>
<td>438.5 lb/Mgal</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Engine 12</td>
<td>Natural Gas</td>
<td>291 lb/MMCF</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Engine 13</td>
<td>Natural Gas</td>
<td>301 lb/MMCF</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Column 1: Amount of fuel burned in each emission unit, or number of hours operating in dual fuel mode.

Column 2: NOx emission factors taken from WebFire:
- SCC 20100102 for diesel combustion in Engines 1 and 2
- SCC 20200401 for diesel combustion for Engines 3 through 11
- SCC 20200402 for dual fuel for Engine 4, 6, and 7 through 11.


Column 3: NOx emissions:
- For diesel = Amount of diesel burned (Mgal) x EF ÷ 2000
- For Dual Fuel = Hour operating x unit HP x EF NOx/hp-hr
- For natural gas = Amount of Gas Burned (MMCF) x EF ÷ 2000

Column 4: Total NOx emissions for all fuels burned for each emission unit (example: for Engine 4 = Sum of Column 3 for diesel-only operation and dual fuel operation), must be less than 25 tons to maintain exemption in 10 CSR 10-6.350(1)(B)1.
Missouri Department of Natural Resources' Director's Recommendation to
The Missouri Air Conservation Commission on
Kennett Board of Public Works Variance Application

Introduction
The Kennett Board of Public Works (Kennett) owns and operates the Kennett Generating Plant. This plant has a generating capacity of 44 megawatts and serves 6,000 customers in the City of Kennett.

On May 11, 2017, the Missouri Department of Natural Resources' (Department) Air Pollution Control Program (Program) received a request from Kennett for a variance for two large stationary spark ignited internal combustion engines (IC engines). The variance would exempt Kennett from the monitoring requirements specified in Missouri Air Conservation Commission Regulation 10 CSR 10-6.390, “Control of NOx Emissions From Large Stationary Internal Combustion Engines,” herein after referred to as “the rule.”

Issue
The two IC engines are located at the Kennett Generating Station and are identified in their operating permit as EU0012 and EU0013. These sources are currently subject to the monitoring requirements specified in (3)(E) of the rule, which requires one of the following:

- The installation and maintenance of a continuous emissions monitoring system (CEMS), or
- A calculational and record keeping procedure based upon actual NOx emissions testing and correlations with operating parameters, that is approved by the director and the EPA, and incorporated into the SIP in writing prior to implementation.

Current operating information regarding these IC engines follows:

- Each engine has operated less than 300 hours per year over the past five years,
- The average natural gas usage over the past three years, for both engines combined, is 0.18 million cubic feet per year, and
- The average NOx emissions over the past three years, for both engines combined, is 2.6 tons per year.

The Department is in the early process of revising the rule. The draft amendment will add a twenty-five (25) ton exemption for spark-ignited IC engines similar to the exemption currently in the rule for combustion ignition IC engines. The twenty-five (25) ton exemption for spark ignited IC engines will provide the Kennett Generating Plant additional flexibility in the emission measurement approaches for compliance determinations. Currently Kennett tracks NOx emissions using an emission factor derived from a stack test. Kennett will continue to use this
method to measure emissions. As stated, their emissions are well below the proposed twenty-five (25) ton exemption.

The Program is working with Kennett to issue a current operating permit for the facility. If approved, the variance will be included in the supporting documentation for issuance of this permit.

Kennett requests this variance for a period of two years, or until the rule revision comes into effect, whichever comes first. Kennett understands that the rulemaking process is lengthy and, if not completed within 2 years, they may request an extension of the variance. Kennett also understands that if at a future date, NOx emissions from either of these engines exceed 25 tons, this variance will be rescinded for that engine.

If certain conditions are met, the Commission may grant a variance, Sections 643.055 and 643.110, RSMo. The Department has reviewed these conditions and the facts of this situation. Sections 643.055 and 643.055, RSMo, authorizes the Commission to grant a variance if the person applying for the variance can show that compliance with the rule:

- Would cause economic hardship;
- Is physically impossible;
- Is more detrimental to the environment than the variance would be;
- Is impractical or of insignificant value under the existing conditions;
- Will result in taking of property without just compensation; or
- Will result in the closing and elimination of any lawful business, occupation, or activity, without sufficient corresponding benefit or advantage to the people.

The Department believes Kennett has adequately shown that compliance with the rule is impractical or of insignificant value under the existing conditions.

Furthermore, the Commission is legally precluded from granting a variance. "where the effect of the variance will permit the continuance of a health hazard." Section 643:110.1, RSMo. The Department is of the opinion that granting this variance will not result in a health hazard.

Recommendation
The Department believes this variance will result in no negative impact on air quality and recommends granting a variance for a period of two years or until such time as the rule amendment comes into effect, whichever comes first. The effect of this variance will be to allow the Kennett Generating Plant additional flexibility to monitor NOx emissions in a more practical way. Due to the lengthy rule amendment process, we recommend this variance remain valid and in effect for a period of two (2) years or until such time as the rule amendment comes into effect, whichever comes first.
VARIANCE APPROVAL: The Missouri Air Conservation Commission hereby approves the recommendation of the Director of the Missouri Department of Natural Resources with respect to granting a variance to 10 CSR 10-6.390(3)(E) for the Kennett Board of Public Works. The Commission approves this variance for a period of two (2) years or until such time as the rule amendment comes into effect, whichever comes first, or until such time as either source emits more than 25 tons per year, for that source. This variance may be extended by affirmative action of the Commission pursuant to Section 643.110.3, RSMo.

Signature _______________________________ Date ____________

Signature _______________________________ Date ____________

Signature _______________________________ Date ____________

Signature _______________________________ Date ____________

Signature _______________________________ Date ____________
STATEMENT OF BASIS

Installation Description
Kennett Generating Plant produces electricity for the surrounding community. The installation generates electricity through four (4) diesel generators and seven (7) diesel/dual-fuel generators ranging from 600 to 8725 horsepower and two (2) 4-stroke lean-burn reciprocating engines using natural gas. A 500,000-gallon petroleum storage tank and two (2) lubricating oil storage tanks (2,600 and 1,300 gallons each) are also located on the 12.6-acre site. The facility is major source of NOx. It is not currently on the list of named sources, therefore fugitive emissions are not included in the potential to emit.

Updated Potential to Emit for the Installation

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Potential to Emit (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM10</td>
<td>4.94</td>
</tr>
<tr>
<td>PM2.5</td>
<td>4.85</td>
</tr>
<tr>
<td>Sulfur Oxides (SOx)</td>
<td>6.21</td>
</tr>
<tr>
<td>Nitrogen Oxides (NOx)</td>
<td>159.14</td>
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<tr>
<td>Volatile Organic Compounds</td>
<td>22.7</td>
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<tr>
<td>Carbon Monoxide (CO)</td>
<td>91.6</td>
</tr>
<tr>
<td>Hazardous Air Pollutants (HAP’s)</td>
<td>0.53</td>
</tr>
</tbody>
</table>

- Engines #1 and #2 were evaluated at 500 hours per year due to being designated as emergency engines. Emission factors were taken from WebFIRE SCC code 20100102.
- Engines #3 and #5 were evaluated at 500 hours per year due to being designated as emergency engines. Emission factors were taken from WebFIRE SCC code 20200401.
- Engines #4, #6 and #7 were evaluated at 500 hours per year due to being designated as emergency engines. Emission factors for worst case fuel were used and taken from WebFIRE SCC codes 20200401 and 20200402.
- Engines #8, #9, #10 and #11 were evaluated at 100 hours per year due to being designated as limited use engines. Emission factors for worst case fuel were used and taken from WebFIRE SCC codes 20200401 and 20200402.
- Engine #12 and #13 were evaluated assuming 2483 hours of operation per year which is limited due to the 40 ton per year NOx limit from construction permit 12000-007. Emission factors were taken from WebFIRE SCC code 20200254.
- The 500,000 gallon diesel storage tank emissions from working and breathing loss were calculated using emission factors from WebFIRE SCC codes 40301019 and 40301021.

Reported Air Pollutant Emissions, tons per year

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<tbody>
<tr>
<td>Particulate Matter ≤ Ten Microns (PM10)</td>
<td>0.40</td>
<td>0.09</td>
<td>0.15</td>
<td>0.15</td>
<td>0.76</td>
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<tr>
<td>Particulate Matter ≤ 2.5 Microns (PM2.5)</td>
<td>0.40</td>
<td>0.09</td>
<td>0.15</td>
<td>0.15</td>
<td>0.76</td>
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<tr>
<td>Sulfur Oxides (SOx)</td>
<td>0.73</td>
<td>0.10</td>
<td>0.15</td>
<td>0.19</td>
<td>1.75</td>
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<tr>
<td>Nitrogen Oxides (NOx)</td>
<td>16.1</td>
<td>4.41</td>
<td>7.23</td>
<td>7.68</td>
<td>72.96</td>
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<tr>
<td>Volatile Organic Compounds (VOC)</td>
<td>1.84</td>
<td>0.43</td>
<td>0.73</td>
<td>0.73</td>
<td>5.12</td>
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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 April 19, 2011;
2) 2016 Emissions Inventory Questionnaire, received February 27, 2017;
4) WebFIRE; and
5) All documents listed in Construction Permit History.

Applicable Requirements Included in the Operating Permit but Not in the Application or Previous Operating Permits
In the operating permit application, the installation indicated they were not subject to the following regulation(s). However, in the review of the application, the agency has determined that the installation is subject to the following regulation(s) for the reasons stated.

10 CSR 10-6.261, Control of Sulfur Dioxide Emissions. This rule was added to the MO Code of State Regulations following the recension of 10 CSR 10-6.260 and is applicable to engines 1 through 11 at this installation. Engines 12 and 13 burn only natural gas and are exempt per 10 CSR 10-6.26(1)(A).

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

10 CSR 10-6.100, Alternate Emission Limits
This rule is not applicable because the installation is in an ozone attainment area.

10 CSR 10-6.220, Restriction of Emission of Visible Air Contaminants
The engines at this facility are exempt from this rule per 10 CSR 10-6.220(1)(A).

Construction Permit History
The following construction permits have been issued to this installation:

Construction Permit 122000-007, Issued December 22, 2000
This construction permit authorized the installation of two 4-stroke lean-burn reciprocating engines for generating electricity using natural gas and two lubricating oil storage tanks of 2600 and 1300 gallons. The permit includes a 40 ton NOx and a 10 ton formaldehyde limit on the engines (EP15 and EP16). Testing is required to establish emission factors for emission
tracking. The testing was completed on October 2, 2001 and the results are included on record keeping Attachments B and C.

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

40 CFR Part 60 Subpart IIII, *New Source Performance Standards for Stationary Compression Ignition Internal Combination Engines*

40 CFR Part 60 Subpart JJJJ, *New Source Performance Standards for Stationary Spark Ignition Internal Combination Engines*

These subparts do not apply to the engines at this facility because they were constructed prior to the applicability dates.

40 CFR Part 60 Subpart Kb, *Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984.* This rule applies to tanks storing VOCs with a capacity of 19,800 gallons capacity with a true vapor pressure greater than 3.5 kPa. Diesel has a maximum true vapor pressure of 0.016 psi [0.11 kPa] at 90°F (see AP-42 Table 7.1-2) which is less than 3.5 kPa; therefore, the diesel storage tank is exempt per §60.110b(b).

**Maximum Achievable Control Technology (MACT) Applicability**


Although the current potential to emit indicates that this installation is an area source of HAPs, it is actually a major source because on the compliance date the engines were not classified as emergency and/or limited use engines, therefore the PTE at that time was above major levels.

Engines 1 through 11 do not have to meet the requirements of this subpart according to §63.6590(b)(3)(iii) and (iv) which exempts existing emergency and limited use stationary RICE with greater than 500 brake HP located at a major source of HAP emissions. Engines 1 through 7 must operate as emergency engines; therefore the requirements to operate as emergency engines are included in the operating permit for these units. Likewise the requirement to operate Engines 8 through 11 as limited use engines is also included in the operating permit. If at any time these engines cease to be operated as emergency or limited use engines the appropriate provisions of this subpart will apply.

Engines #12 and #13 are exempt per §63.6590(b)(3)(ii) which exempts existing spark ignition 4 stroke lean burn (4SLB) stationary RICE with greater than 500 brake HP located at a major source of HAP emissions.


This subpart does not apply to the space heaters at this facility because they burn only natural gas. The 1.611 MMBtu/hr natural gas boilers have been removed.

40 CFR Part 63 Subpart JJJJJJ, *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial and Institutional Boilers Area Sources*

This subpart does not apply to the space heaters at this facility because this installation is not an area source of HAPs.
National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

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

Compliance Assurance Monitoring (CAM) Applicability

40 CFR Part 64, Compliance Assurance Monitoring (CAM)
The CAM rule applies to each pollutant specific emission unit that:
- 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 because none of the pollutant-specific emission units uses a control device to achieve compliance with a relevant standard.

Greenhouse Gas Emissions

Note that this source may be 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. The applicant is required to report the data directly to EPA. The public may obtain CO2 emissions data for this installation by visiting http://epa.gov/ghgreporting/ghgdata/reportingdatasets.html.

Other Regulatory Determinations

10 CSR 10-6.350, Emission Limitations and Emissions Trading of Oxides of Nitrogen
The engines 1 through 11, 15 and 16 qualify for the exemption under 10 CSR 10-6.350(1)(B)1. requiring that the units not emit more than 25 tons of NOx from the engines during the control period, which is From May 1 to September 30 of each year. The units are required to install and operate a non-resettable hour meter and monitor and record the rolling NOx emissions during the control period in order to maintain the exemption.

10 CSR 10-6.390, Control of NOx Emissions From Large Stationary Internal Combustion Engines
This rule applies to EP15 and 16 and they are subject to a 3.0 g/hp-hr NOx limitation. On September 28, 2017 a variance request to exempt the facility from the monitoring requirements specified in the rule was presented to the Missouri Air Conservation Commission. The variance
was approved, therefore the facility is not subject to the monitoring requirements under 10 CSR 10-6.390. The facility currently tracks NOx emissions using an emission factor derived from a stack test. The following calculations demonstrate that EP15 and EP16 are in compliance with the NOx emission limit using the emission factor, maximum hourly design rate and hp of the engines.

For EP15:
NOx Emission Factor = 291 lb/MMCF
MHDR = 0.05446 MMCF/hr
HP = 8,800
Emissions (g/hp-hr) = 290.75 (lb/MMCF) x 0.05446 MMCF/hr x 453.59 g/lb ÷ 8,800 hp = 0.816 g/hr-hr

For EP16:
NOx Emission Factor = 301 lb/MMCF
MHDR = 0.05477 MMCF/hr
HP = 8,800
Emissions (g/hp-hr) = 301 (lb/MMCF) x 0.05477 MMCF/hr x 453.59 g/lb ÷ 8,800 hp = 0.850 g/hr-hr

10 CSR 10-6.260 Restriction of Emission of Sulfur Compounds
Although this rule was rescinded from the Missouri Code of State Regulations on November 30, 2015, it has not yet been removed from the State Implementation Plan (SIP), therefore it is still applicable to the facility and must remain in the operating permit until it is removed from the SIP.

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 Kennett Generating Plant (069-0063) was placed on public notice as of December 8, 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. Comments were received from Sandra Cupp, Civil & Environmental Consultants, Inc. on January 8, 2018. Comments are addressed below.

Comment #1: The installation description on the front page of the permit lists several pollutants for which the facility is a major source. In the description in the Statement of Basis (SB-1), only NOx is listed as a major pollutant. The permit should clearly and consistently indicate which pollutants are major.

Response to Comment: The installation description on the front page of the permit has been corrected to say that the facility is a major source for only NOx.

Comment #2: On page 6, Under Permit Condition 1. The MHDR for both generators should be 57.71 MMBtu/hr, as they are identical units.

Response to Comment: The emission unit description for Engine #13 on page 6 has been corrected.

Comment #3: On page 10, Under Permit Condition 5 – Applicability. Please clarify how the 100 hours of operation is to be tracked. Will it be on a calendar year basis, as it is for the emergency units?

Response to Comment: According to EPA, although the term “year” is not defined in subpart ZZZZZ in all cases, the EPA interprets “year” to mean “calendar year” because it is the most appropriate time frame for monitoring the operation of emergency and limited use RICE. Permit Condition 5 has been updated to require monitoring and recording of the hours of operation of Engines #8-#11 for each calendar year.

Comment #4: On page 27, Attachment D. Throughout the attachment, Engines #12 and #13 are referred to as Engines #15 and Engines #16. While the emission point numbers are EP-15 and EP-16, it is Kennett’s preference to use the nomenclature of Engine #12 and Engine #13.

Response to Comment: The record keeping table in Attachment D has been corrected to list Engines 12 and 13.

Comment #5: The emission factors for engines 4, 6, 7-11 are not from 20200402, as stated in the notes below the table. (Why does engine #8 have a different factor from the others?) If the emissions are based on the operating hours for dual fuel operation, then separate tracking of diesel and natural gas would not be necessary. Kennett could record # of operating hours x unit hp x 18 lb Nox/hp-hr (Webfire 20200402) when in dual fuel mode. (Diesel tracking would still be required IF dual fuel engines are operated in diesel-only mode. The table could list “diesel-only” and “dual-fuel” as the two modes, rather than diesel and natural gas.

Response to Comment: The Attachment D NOx emission factors for Natural Gas for Units 4 and 7-11 have been replaced with the emission factor for NOx for dual fuel engines for SCC 20200402. The equation for calculating emissions for the dual fuel engines is included in the notes.
Comment #6: On page SB-1, in the table notes: For engines #4, #6 and #7 – the SCC codes should be 20200401 and 20200402. For engines #8, #9, #10 and #11 – next bullet point – same SCC codes should apply.
Response to Comment: The notes for the table Updated Potential to Emit for the Installation has been updated to reference the correct SCC codes for Emission Units 4 and 6-11.

Comment #7: Please check the emission factor used for calculating the potential emissions diesel combustion in units 1-11. For SCC 20100102 it should be 14.0, not 140 lb/Mgal.
Response to Comment: The potential to emit calculations were corrected using the correct emission factor of 14.0 lb/Mgal for Engines #1 and #2 (SCC code 20100102). The table in the statement of basis has been updated.
Mr. Allen Jones  
Kennett Generating Plant  
303 South Anthony Street  
Kennett, MO 63857  

Re: Kennett Generating Plant, 069-0063  
Permit Number: OP2018-010

Dear Mr. Jones,

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: 2011-04-043