



Missouri Department of dnr.mo.gov

# NATURAL RESOURCES

Michael L. Parson, Governor

Carol S. Comer, Director

December 21, 2020

Allen Jones  
Power Plant Supervisor  
Kennett Generating Plant  
401 South Anthony Street  
Kennett, MO 63857

RE: Part 70 Operating Permit Significant Modification - Permit Number: OP2018-010A  
Project Number: 2019-11-017; Installation Number: 069-0063

Dear Allen Jones:

Your Part 70 Operating Permit OP2018-010 is being modified in response to your application dated November 5, 2019. Your request was to modify Attachment D, the monthly nitrogen oxides tracking record for the thirteen engines at this installation.

Attachment D of operating permit OP2018-010 is the Monthly NO<sub>x</sub> Emissions Tracking Record for the thirteen engines at this installation. Attachment D lists each engine and fuel type (diesel, dual fuel, and natural gas) individually for tracking purposes. In practice, plant personnel are finding it very difficult to track hours of operation in "dual fuel" mode because the engines can transition back and forth between diesel-only and "dual fuel" mode within a short time frame. The application requests that Attachment D be modified in order to track engine emissions on a fuel usage basis only. This method is consistent the emission calculations for the Emission Inventory Questionnaire and will provide valid tracking of NO<sub>x</sub> emissions based on published EPA emission factors.

This permit is revised by replacing Attachment D with the revised Attachment D on the attached pages. In order to ensure that you are complying with the correct version of Attachment D, please cross out, blacken, or redact the outdated version of Attachment D.

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



Allen Jones  
Page Two

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

Sincerely,

AIR POLLUTION CONTROL PROGRAM

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

Kendall B. Hale  
Permits Section Chief

KBH:msa

Enclosures

c: Southeast Regional Office  
PAMS File: 2019-11-017



# PART 70

## PERMIT TO OPERATE

**Operating Permit Number:** OP2018-010A  
**Installation Name:** Kennett Generating Plant  
**Expiration Date:** February 7, 2023  
**Installation ID:** 069-0063  
**Project Number:** 2019-11-017

### **Description of Part 70 Significant Modification:**

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 NO<sub>x</sub>.

Attachment D of operating permit OP2018-010 is the Monthly NO<sub>x</sub> Emissions Tracking Record for the thirteen engines at this installation. Attachment D lists each engine and fuel type (diesel, dual fuel, and natural gas) individually for tracking purposes. In practice, plant personnel are finding it very difficult to track hours of operation in "dual fuel" mode because the engines can transition back and forth between diesel-only and "dual fuel" mode within a short time frame. The application requests that Attachment D be modified in order to track engine emissions on a fuel usage basis only. This method is consistent the emission calculations for the Emission Inventory Questionnaire and will provide valid tracking of NO<sub>x</sub> emissions based on published EPA emission factors.

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**Attachment D**

Monthly NOx Emissions Tracking Record

For Month of \_\_\_\_\_ Year \_\_\_\_\_

Emission Unit Engine #	Column 1 Amount of diesel burned (Mgal)	Column 2 Diesel EF (lb/Mgal)	Column 3 NOx Emissions from Diesel Fuel	Column 4 Natural Gas Burned (MMCF)	Column 5 Natural Gas EF (lb/MMCF)	Column 6 NOx Emissions from Natural Gas	Column 7 Total Emissions (tons)
EP01 Engine 1		604		These three engines do not combust natural gas			
EP01 Engine 2		604					
EP01 Engine 3		438.5					
EP01/04 Engine 4		438.5			2,840		
EP01 Engine 5		438.5		This engine does not combust natural gas			
EP01/04 Engine 6		438.5			2,840		
EP01/04 Engine 7		438.5			2,840		
EP01/04 Engine 8		438.5			2,840		
EP01/04 Engine 9		438.5			2,840		
EP01/04 Engine 10		438.5			2,840		
EP01/04 Engine 11		438.5			2,840		
EP15 Engine 12	These two engines do not combust diesel fuel				291		
EP16 Engine 13					301		

Column 1: Amount of diesel fuel burned in each engine (Mgal)

Column 4: Amount of natural gas burned in each engine (MMCF)

Columns 2 and 5: NOx emission factors taken from WebFire and stack testing:

SCC 20100102 for diesel combustion in Engines 1 and 2

SCC 20200401 for diesel combustion for Engines 3 through 11

SCC 20100202 for natural gas combustion for Engine 4 and Engines 6 through 11

Emission factor for EP-15 and 16, determined from stack tests performed October 2, 2001.

Engine 12 (EP-15): 291 lb/MMCF; Engine 13 (EP-16): 301 lb/MMCF

Column 3: Monthly NOx emissions from diesel combustion is the Amount of diesel burned (Mgal) x EF ÷ 2000

Column 6: Monthly NOx emissions from combustion of natural gas is the Amount of Gas Burned (MMCF) x EF ÷ 2000

Column 7: Total NOx emissions for all fuels burned for each emission unit (example: for Engine 4 = Sum of Column 3 for diesel operation and Column 6 for natural gas combustion), must be less than 25 tons to maintain exemption in 10 CSR 10-6.350(1)(B)1.

## **Response to Public Comments**

The draft operating permit for the Kennett Generating Plant was placed on public notice on April 24, 2020 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 <https://dnr.mo.gov/env/apcp/permit-public-notice.htm>. No public comments were received during the comment period.