MISSOURI
DEPARTMENT OF
NATURAL RESOURCES
Air Pollution Control Program

PART 70
PERMIT TO OPERATE

Under the authority of RSMo 643 and the Federal Clean Air Act the applicant is authorized to operate the air contaminant source(s) described below, in accordance with the laws, rules, and conditions set forth herein.

Operating Permit Number: OP2018-065
Expiration Date: JUL 3 1 2023
Installation ID: 159-0075
Project Number: 2016-04-054

Installation Name and Address
Missouri Center for Waste to Energy
24409 Oak Grove Lane
Sedalia, MO 65301
Pettis County

Parent Company's Name and Address
State Fair Community College
3201 West 16th Street
Sedalia, MO 65301

Installation Description:
Missouri Center for Waste to Energy is a source consisting of two spark ignition reciprocating internal combustion engine (SI RICE) electrical generators fueled exclusively by LFG. The source is located on property owned by Central Missouri Landfill (ID 159-0055) in Sedalia. Missouri Center for Waste to Energy and Central Missouri Landfill are considered to be a combined installation for permitting applicability. The combined installation is subject to NSPS WWW with a design capacity greater than or equal to 2.5 million megagrams and 2.5 million cubic meters, requiring a Part 70 operating permit. This installation is not on the List of Named Installations found in 10 CSR 10-6.020(3)(B), Table 2. The installation's major source level is 250 tons per year and fugitive emissions are not counted toward major source applicability. This installation is a major source of HAP emissions.

Prepared by
Kasia Wasescha
Operating Permit Unit

Director or Designee
Department of Natural Resources

JUL 3 1 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 Source</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>EU-01</td>
<td>GE Jenbacher J 320 GS-C81, 20 Cylinder, Lean Burn, 4-stroke SI RICE, LFG</td>
</tr>
<tr>
<td>EU-02</td>
<td>GE Jenbacher J 420 GS-B81, 20 Cylinder, Lean Burn, 4-stroke SI RICE, LFG</td>
</tr>
</tbody>
</table>

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

<table>
<thead>
<tr>
<th>Emission Source</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Process Cooling Tower</td>
</tr>
<tr>
<td></td>
<td>Waste Oil Tank</td>
</tr>
<tr>
<td></td>
<td>(2) Stainless Steel Siloxane Treatment Tanks (approx. 800 gal)</td>
</tr>
<tr>
<td></td>
<td>SafetyKleen parts washing tank</td>
</tr>
</tbody>
</table>
II. Plant Wide Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued. The plant wide conditions apply to all emission units at this installation. All emission units are listed in Section I under Emission Units with Limitations and Emission Units without Limitations.

None.
III. Emission Unit Specific Emission Limitations

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

PERMIT CONDITION 001
10 CSR 10-6.060 Construction Permits Required
Construction Permit 122013-003, issued December 3, 2013

<table>
<thead>
<tr>
<th>Emission Source</th>
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</thead>
<tbody>
<tr>
<td>EU-01</td>
<td>GE Jenbacher J 320 GS-C81, 20 Cylinder, Lean Burn, 4-stroke SI RICE, Landfill Gas, manufactured May 30, 2013</td>
</tr>
<tr>
<td>EU-02</td>
<td>GE Jenbacher J 420 GS-B81, 20 Cylinder, Lean Burn, 4-stroke SI RICE, Landfill Gas, manufactured August 15, 2013</td>
</tr>
</tbody>
</table>

Emission Limitation:
The permittee shall emit less than 40.0 tons of NO\textsubscript{x} in any consecutive 12-month period from EU-01 and EU-02. [Special Condition 1A]

Monitoring/Recordkeeping:
1) The permittee shall calculate the monthly and 12-month rolling total NO\textsubscript{x} emissions using Attachment A or an equivalent form approved by Missouri Department of Natural Resources’ personnel. Forms may be kept in paper or electronic format.[Special Condition 1B]
2) The permittee shall retain each record required by this permit for not less than five years and shall make them immediately available to any Missouri Department of Natural Resources’ personnel upon request. [Special Condition 3A]

Reporting:
1) The permittee shall report any exceedance of any of the terms imposed by this permit condition, or any malfunction which could cause an exceedance of any of the terms imposed by this permit condition, no later than ten (10) days after the exceedance or event causing the exceedance.
2) The permittee shall report any deviations from the monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring reports and the annual compliance certification.
3) All reports and certifications shall be submitted to the Air Pollution Control Program’s Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov.
PERMIT CONDITION 002
10 CSR 10-6.060 Construction Permits Required
Construction Permit 122013-003, issued December 3, 2013

<table>
<thead>
<tr>
<th>Emission Source</th>
<th>Description</th>
</tr>
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<tbody>
<tr>
<td>EU-01</td>
<td>GE Jenbacher J 320 GS-C81, 20 Cylinder, Lean Burn, 4-stroke SI RICE, Landfill Gas, manufactured May 30, 2013</td>
</tr>
<tr>
<td>EU-02</td>
<td>GE Jenbacher J 420 GS-B81, 20 Cylinder, Lean Burn, 4-stroke SI RICE, Landfill Gas, manufactured August 15, 2013</td>
</tr>
</tbody>
</table>

Emission Limitation:
The permittee shall emit less than 100.0 tons of CO in any consecutive 12-month period from EU-01 and EU-02. [Special Condition 2A]

Monitoring/Recordkeeping:
1) The permittee shall calculate the monthly and 12-month rolling total CO emissions using Attachment B or an equivalent form approved by Missouri Department of Natural Resources’ personnel. Forms may be kept in paper or electronic format. [Special Condition 2B]
2) The permittee shall retain each record required by this permit for not less than five years and shall make them immediately available to any Missouri Department of Natural Resources’ personnel upon request. [Special Condition 3A]

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 (10) 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 reports and the annual compliance certification.
3) All reports and certifications shall be submitted to the Air Pollution Control Program’s Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov.

PERMIT CONDITION 003
10 CSR 10-6.060 Construction Permits Required
Construction Permit 122013-003, issued December 3, 2013
10 CSR 10-6.070 New Source Performance Regulations
40 CFR Part 60, Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines

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<tr>
<td>EU-01</td>
<td>GE Jenbacher J 320 GS-C81, 20 Cylinder, Lean Burn, 4-stroke SI RICE, Landfill Gas, manufactured May 30, 2013</td>
</tr>
<tr>
<td>EU-02</td>
<td>GE Jenbacher J 420 GS-B81, 20 Cylinder, Lean Burn, 4-stroke SI RICE, Landfill Gas, manufactured August 15, 2013</td>
</tr>
</tbody>
</table>
**Emission Limitation:**
The permittee shall comply with the following emission limits, also found in Table 1 to Subpart JJJJ of Part 60, over the entire life of the engine[1]. [§60.4233(f)(5)]

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>NO\textsubscript{x}</th>
<th>VOC</th>
<th>CO</th>
</tr>
</thead>
<tbody>
<tr>
<td>EU-01</td>
<td>2.0</td>
<td>1.0</td>
<td>5.0</td>
</tr>
<tr>
<td>EU-02</td>
<td>2.0</td>
<td>1.0</td>
<td>5.0</td>
</tr>
</tbody>
</table>

**Compliance Requirements for Permittees:**
1) As each engine is classified as non-certified, the permittee must demonstrate compliance by completing the following: [§60.4243(b)]
   a) The permittee must keep a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions. [§60.4243(b)(2)(ii)]
   b) The permittee shall conduct subsequent performance testing every 8,760 hours or 3 years, whichever comes first, thereafter, to determine respective NO\textsubscript{x}, VOC and CO emission factors and to demonstrate compliance with emission limits. [§60.4243(b)(2)(ii) & Special Condition 4B]

**Performance Testing:**
1) The performance tests shall provide emission factors for a full range of loads on the engines (i.e. 50, 75, and 100 percent). The tests shall be conducted to represent at a minimum, three different operational loads for each pollutant. One 3-run test set shall be conducted with the emission unit operating at permitted capacity. Permitted capacity is defined as 90 to 100 percent of the maximum operation rate (Table 2) allowed by the permit. If it is impractical to test at permitted capacity, an emission unit may be tested at less than the maximum permitted capacity; in this case, subsequent engine operation is limited to 110 percent of the test rate until a new test is conducted. Once the engine is so limited, operation at higher capacities is allowed for no more than 15 total days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity. [Special Condition 4A]

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Engine Power (brake hp)</th>
<th>LFG Flowrate (scf/hr)</th>
<th>Generator Output (eKW)</th>
</tr>
</thead>
<tbody>
<tr>
<td>EU-01</td>
<td>1,468</td>
<td>29,143</td>
<td>1,050</td>
</tr>
<tr>
<td>EU-02</td>
<td>1,966</td>
<td>33,074</td>
<td>1,421</td>
</tr>
</tbody>
</table>

2) The tests shall be completed in accordance with the procedures outlined below and in §60.4244. [Special Condition 4A]
   a) NO\textsubscript{x} and CO emission factors (gram/hp-hr) shall be developed from the most recent performance tests to be used to determine compliance with 40 CFR Subpart JJJJ, Permit Condition 001 and Operating Permit Condition 002. [Modified Special Condition 4A]

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[1] Emissions testing done June 2, 2017 indicates compliance with the emission limitations. Testing resulted in 0.89 g/hp-hr NO\textsubscript{x}, 2.15 g/hp-hr CO, and < 0.01 g/hp-hr VOC for both engines.
b) A completed Performance Test Plan Form, or an equivalent form approved by Missouri Department of Natural Resources’ personnel, must be submitted to the Air Pollution Control Program to stacktesting@dnr.mo.gov 30 days prior to the proposed test date so that the Air Pollution Control Program may arrange a pretest meeting, if necessary, and assure that the test date is acceptable for an observer to be present. The Proposed Test Plan may serve the purpose of notification and must be approved by the Director prior to conducting the required emission testing. [Special Condition 4C]

c) The test report is to fully account for all operational and emission parameters addressed both in the construction permit conditions as well as in any other applicable state or federal rules or regulations. [Special Condition 4E]

3) If the performance testing indicates peak load outside of the permitted capacity established from the performance testing, or indicates emission rates exceeding the emission limitations listed in Table 1 from 40 CFR 60 Subpart JJJJ, the permittee shall submit a construction permit amendment application to the Air Pollution Control Program within 60 days of submitting the required performance test report.

4) The permittee must keep records of the following:
   a) All notifications submitted to comply with 40 CFR 60 Subpart JJJJ and all documentation supporting any notification.
   b) Maintenance conducted on the engine.
   c) The stationary SI internal combustion engine is not a certified engine and is subject to §60.4243(a)(2), documentation shall be provided that the engines meet the emission standards.

**General Provisions:**
The permittee shall comply with the applicable general provisions that apply in Table 3 of NSPS JJJJ. [§60.4246]

**Recordkeeping:**
1) The permittee shall keep records of all notifications submitted to comply with NSPS JJJJ and all documentation supporting any notification. [§60.4245(a)(1)]
2) The permittee shall keep records of all maintenance conducted on the engines. [§60.4245(a)(2)]
3) The permittee shall retain each record required by this permit for not less than five years and shall make them immediately available to any Missouri Department of Natural Resources’ personnel upon request. [Special Condition 3A]

**Reporting:**
1) The permittee shall submit two copies of a written report of the performance test results to the Environmental Protection Agency, Air and Waste Management Division, 11201 Renner Blvd., Lenexa, KS 66219, within 60 days of testing completion. The permittee shall copy the Air Pollution Control Program on all correspondence. The report must include legible copies of the raw data sheets, analytical instrument laboratory data, and complete sample calculations form the required EPA Method for at least one sample run. [Special Condition 4D]
2) The permittee shall report any exceedance of any of the terms imposed by this permit condition, or any malfunction which could cause an exceedance of any of the terms imposed by this permit condition, no later than ten (10) days after the exceedance or event causing the exceedance.
3) The permittee shall report any deviations from the monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring reports and the annual compliance certification.
4) All reports and certifications shall be submitted to the Air Pollution Control Program’s Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov.

**PERMIT CONDITION 004**

10 CSR 10-6.075 Maximum Achievable Control Technology Regulations

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</tr>
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</table>

**Monitoring/Recordkeeping:**

1) The permittee must monitor and record the fuel usage daily with separate fuel meters to measure the volumetric flow rate of landfill gas. In addition, the permittee must operate the stationary RICE in a manner which reasonably minimizes HAP emissions. [§63.6625(c)]

2) The permittee must keep records of the daily fuel usage monitors. [§63.6655(c)]

3) The permittee shall retain each record required by this permit condition for not less than five years and shall make them immediately available to any Missouri Department of Natural Resources’ personnel upon request.

**General Provisions:**
The permittee shall comply with the applicable general provisions in Table 8 of MACT ZZZZ. [§63.6665]

**Reporting:**

1) The permittee must submit an annual report containing, at a minimum, the following information: [§63.6650(g) & Table 7 to MACT ZZZZ]
   a) The fuel flow rate of each fuel and the heating values that were used in your calculations, and you must demonstrate that the percentage of heat input provided by landfill gas, is equivalent to 10 percent or more of the gross heat input on an annual basis; and [§63.6650(g)(1)]
   b) The monitoring/recordkeeping requirements of this permit condition, and any deviations from its requirements; and [§63.6650(g)(2)]
   c) Any problems or errors suspected with the meters. [§63.6650(g)(3)]

2) Each subsequent compliance report shall cover the annual reporting period from January 1 through December 31. [§63.6650(b)(8)]

3) Each subsequent compliance report must be postmarked or delivered no later than January 31. [§63.6650(b)(9)]

4) Each compliance report must contain the following information: [§63.6650(c)]
   a) Company name and address; [§63.6650(c)(1)]
   b) Statement by a responsible official, with that official’s name, title, and signature, certifying the accuracy of the content of the report; [§63.6650(c)(2)]
   c) Date of report and beginning and ending dates of the reporting period. [§63.6650(c)(3)]
   d) If the permittee had a malfunction during the reporting period, the compliance report must include the number, duration, and a brief description for each type of malfunction which
occurred during the reporting period and which caused or may have caused any applicable emission limitation to be exceeded. The report must also include a description of actions taken by the permittee during a malfunction of the engines to minimize emissions in accordance with §63.6605(b), including actions taken to correct a malfunction. [§63.6650(c)(4)]

e) If there are no deviations from any emission or operating limitation that applies to the engines, a statement that there were no deviations from the emission or operating limitation during the reporting period. [§63.6650(c)(5)]

f) The total operating time of the stationary engines at which the deviation occurred during the reporting period. [§63.6650(d)(1)]

g) Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken. [§63.6650(d)(2)]

5) The permittee shall report any deviations from the monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring reports and the annual compliance certification.

6) All reports and certifications shall be submitted to the Air Pollution Control Program’s Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov

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<td>GE Jenbacher J 420 GS-B81, 20 Cylinder, Lean Burn, 4-stroke SI RICE, Landfill Gas, manufactured August 15, 2013</td>
</tr>
</tbody>
</table>

**Emission Limitation:**

1) The permittee shall not cause or permit the emission into the atmosphere gases containing more than five hundred parts per million by volume (500 ppmv) of sulfur dioxide. [10 CSR 10-6.260(A)2].

2) The permittee shall not cause or permit the emission into the atmosphere gases containing 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 period. [10 CSR 10-6.260(A)2]

**Monitoring/Recordkeeping:**

Not required. See Statement of Basis.

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2 This regulation was rescinded from Missouri Code of State Regulations on November 30, 2015 but it still remains in the EPA-approved SIP and thus still remains an applicable regulation. Upon adoption of 10 CSR 10-6.261 into Missouri’s SIP, 10 CSR 6.260 will be removed from the SIP and thus this rule will no longer be applicable to the installation. No action on the part of the permittee is needed to revise the operating permit. Upon removal of 10 CSR 10-6.260 from the SIP, Permit Condition 005 shall no longer be enforceable.
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.

<table>
<thead>
<tr>
<th>10 CSR 10-6.045 Open Burning Requirements</th>
</tr>
</thead>
<tbody>
<tr>
<td>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.</td>
</tr>
<tr>
<td>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.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>10 CSR 10-6.050 Start-up, Shutdown and Malfunction Conditions</th>
</tr>
</thead>
<tbody>
<tr>
<td>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:</td>
</tr>
<tr>
<td>a) Name and location of installation;</td>
</tr>
<tr>
<td>b) Name and telephone number of person responsible for the installation;</td>
</tr>
<tr>
<td>c) Name of the person who first discovered the malfunction and precise time and date that the malfunction was discovered.</td>
</tr>
<tr>
<td>d) Identity of the equipment causing the excess emissions;</td>
</tr>
<tr>
<td>e) Time and duration of the period of excess emissions;</td>
</tr>
<tr>
<td>f) Cause of the excess emissions;</td>
</tr>
<tr>
<td>g) Air pollutants involved;</td>
</tr>
<tr>
<td>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;</td>
</tr>
<tr>
<td>i) Measures taken to mitigate the extent and duration of the excess emissions; and</td>
</tr>
<tr>
<td>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.</td>
</tr>
<tr>
<td>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.</td>
</tr>
<tr>
<td>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.</td>
</tr>
</tbody>
</table>
4) Nothing in this rule shall be construed to limit the authority of the director or commission to take appropriate action, under sections 643.080, 643.090 and 643.151, RSMo to enforce the provisions of the Air Conservation Law and the corresponding rule.

5) Compliance with this rule does not automatically absolve the permittee of liability for the excess emissions reported.

### 10 CSR 10-6.060 Construction Permits Required

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

### 10 CSR 10-6.065 Operating Permits

The permittee shall file a complete application for renewal of this operating permit at least six months before the date of permit expiration. In no event shall this time be greater than eighteen months. The permittee shall retain the most current operating permit issued to this installation on-site. The permittee shall immediately make such permit available to any Missouri Department of Natural Resources personnel upon request.

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

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

2) Public Availability of Emission Data and Process Information. Any information obtained pursuant to the rule(s) of the Missouri Air Conservation Commission that would not be entitled to confidential treatment under 10 CSR 10-6.210 shall be made available to any member of the public upon request.

3) The permittee shall pay an annual emission fee per ton of regulated air pollutant emitted according to the schedule in the rule. This fee is an emission fee assessed under authority of RSMo. 643.079.

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

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

### 10 CSR 10-6.150 Circumvention

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

### 10 CSR 10-6.165 Restriction of Emission of Odors

This requirement is 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.

10 CSR 10-6.180 Measurement of Emissions of Air Contaminants
1) The director may require any person responsible for the source of emission of air contaminants to make or have made tests to determine the quantity or nature, or both, of emission of air contaminants from the source. The director may specify testing methods to be used in accordance with good professional practice. The director may observe the testing. All tests shall be performed by qualified personnel.
2) The director may conduct tests of emissions of air contaminants from any source. Upon request of the director, the person responsible for the source to be tested shall provide necessary ports in stacks or ducts and other safe and proper sampling and testing facilities, exclusive of instruments and sensing devices as may be necessary for proper determination of the emission of air contaminants.
3) The director shall be given a copy of the test results in writing and signed by the person responsible for the tests.

10 CSR 10-6.280 Compliance Monitoring Usage
1) The permittee is not prohibited from using the following in addition to any specified compliance methods for the purpose of submission of compliance certificates:
   a) Monitoring methods outlined in 40 CFR Part 64;
   b) Monitoring method(s) approved for the permittee pursuant to 10 CSR 10-6.065, “Operating Permits”, and incorporated into an operating permit; and
   c) Any other monitoring methods approved by the director.
2) Any credible evidence may be used for the purpose of establishing whether a permittee has violated or is in violation of any such plan or other applicable requirement. Information from the use of the
following methods is presumptively credible evidence of whether a violation has occurred at an installation:

a) Monitoring methods outlined in 40 CFR Part 64;

b) A monitoring method approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and

c) Compliance test methods specified in the rule cited as the authority for the emission limitations.

3) The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:

a) Applicable monitoring or testing methods, cited in:
   i) 10 CSR 10-6.030, “Sampling Methods for Air Pollution Sources”;
   ii) 10 CSR 10-6.040, “Reference Methods”;
   iii) 10 CSR 10-6.070, “New Source Performance Standards”;
   iv) 10 CSR 10-6.080, “Emission Standards for Hazardous Air Pollutants”; or

b) Other testing, monitoring, or information gathering methods, if approved by the director, that produce information comparable to that produced by any method listed above.

40 CFR Part 82 Protection of Stratospheric Ozone (Title VI)

1) The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:

a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to 40 CFR §82.106.

b) The placement of the required warning statement must comply with the requirements of 40 CFR §82.108.

c) The form of the label bearing the required warning statement must comply with the requirements of 40 CFR §82.110.

d) No person may modify, remove, or interfere with the required warning statement except as described in 40 CFR §82.112.

2) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B of 40 CFR Part 82:

a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices described in 40 CFR §82.156.

b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment described in 40 CFR §82.158.

c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR §82.161.

d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with the record keeping requirements of 40 CFR §82.166. ("MVAC-like" appliance as defined at 40 CFR §82.152).

e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to 40 CFR §82.156.

f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR §82.166.
3) If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.

4) If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements contained in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.

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

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

<table>
<thead>
<tr>
<th>10 CSR 10-6.065(6)(C)1.B Permit Duration</th>
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<tbody>
<tr>
<td>10 CSR 10-6.065(6)(E)3.C Extension of Expired Permits</td>
</tr>
</tbody>
</table>

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.

<table>
<thead>
<tr>
<th>10 CSR 10-6.065(6)(C)1.C General Record Keeping and Reporting Requirements</th>
</tr>
</thead>
</table>

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 or AirComplianceReporting@dnr.mo.gov.
   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.

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

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

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

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

**NOx Compliance Worksheet**

This sheet covers the period from __________ to __________. Copy this sheet as needed.

(month, year)  (month, year)

<table>
<thead>
<tr>
<th>Month, Year</th>
<th>Emission Unit, Description</th>
<th>Time Ran This Month (hr)</th>
<th>NOx Emission Factor (lb/hr)</th>
<th>Monthly NOx Emissions (lb)</th>
<th>Monthly NOx Emissions (tons)</th>
<th>12-month NOx Emissions from Previous Month (tons)</th>
<th>Monthly NOx Emissions from This Month Last Year (tons)</th>
<th>12-month NOx Emissions (tons)</th>
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</table>

A. Record the current month and year
B. Emission unit and description
C. Record each unit’s total hours run during that month.
D. NOx emission factors obtained from stack tests. The most recent stack test for EU-1 occurred on June 1, 2017. The most recent stack test for EU-2 occurred on June 2, 2017.
E. Calculate each unit’s NOx emissions. E = C x D
F. Calculate the current month’s NOx emissions. F = (E1 + E2) / 2000. Include startup, shutdown, and malfunction (SSM) emissions as reported to the Compliance/Enforcement Section per 10 CSR 10-6.050.
G. Record the 12-month NOx emissions (I) from the previous month.
H. Record the monthly NOx emissions (F) from this month last year.
I. Calculate the current month’s NOx emissions. I = F + G – H. A value less than 40.0 tons indicates compliance.
**Attachment B**

**CO Compliance Worksheet**

This sheet covers the period from ___ to ___. Copy this sheet as needed.

<table>
<thead>
<tr>
<th>Month, Year</th>
<th>Emission Unit, Description</th>
<th>Time Ran This Month (hr)</th>
<th>CO Emission Factor (lb/hr)</th>
<th>CO Emissions (lbs)</th>
<th>CO Emissions (tons)</th>
<th>12-month CO Emissions from Previous Month (tons)</th>
<th>Monthly CO Emissions from This Month Last Year (tons)</th>
<th>12-month CO Emissions (tons)</th>
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<tr>
<td>EU-1, J320</td>
<td>10.27</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>EU-2, J420</td>
<td>9.03</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

A. Record the current month and year.
B. Emission unit and description.
C. Record each unit’s total hours run during that month.
D. CO emission factors obtained from stack tests. The most recent stack test for EU-1 occurred on June 1, 2017. The most recent stack test for EU-2 occurred on June 2, 2017.
E. Calculate each unit’s CO emissions. \( E = C \times D \)
F. Calculate the current month’s CO emissions. \( F = (E_1 + E_2) / 2000 \). Include startup, shutdown, and malfunction (SSM) emissions as reported to the Compliance/Enforcement Section per 10 CSR 10-6.050.
G. Record the 12-month CO emissions (I) from the previous month.
H. Record the monthly CO emissions (F) from this month last year.
I. Calculate the current month’s CO emissions. \( I = F + G - H \). A value less than 100.0 tons indicates compliance.
STATEMENT OF BASIS

INSTALLATION DESCRIPTION
Missouri Center for Waste to Energy is a source consisting of two spark ignition reciprocating internal combustion engine (SI RICE) electrical generators. The engines are fueled exclusively by (landfill gas) LFG. The source is located on property owned by Central Missouri Landfill (ID 159-0055) in Sedalia, Pettis County, Missouri. The engines reduce VOC, NMOC, HAPs, and CH₄ collected from the landfill, but are sources of PM, PM₁₀, PM₂.₅, SOₓ, NOₓ, CO, CO₂, and other combustion products. The facility has conditioned the potential emissions of NOₓ to less than 40 tons and CO to less than 100 tons in any consecutive 12-month period to remain below de minimis levels. This installation is not on the List of Named Installations found in 10 CSR 10-6.020(3)(B), Table 2. The installation's major source level is 250 tons per year and fugitive emissions are not counted toward major source applicability. This installation is a major source of HAP emissions.

Missouri Center for Waste to Energy and Central Missouri Landfill are one installation for permitting applicability. In order to be one installation, three criteria must be met: the facilities are located on contiguous or adjacent property, the facilities are under common control, and the facilities share the same two-digit (major group) Standard Industrial Classification (SIC) code (or one facility is considered a support facility to the other). According to the permit application, the waste to energy facility leases property from the landfill. Therefore, the facilities are continuous or adjacent. The waste to energy facility has the right to purchase all of the LFG, and the LFG is the engines’ sole fuel source. Based upon the lease and the dependency of the waste to energy facility upon the landfill for fuel, the facilities are under common control. Both the waste to energy facility and landfill belong to the same two-digit (major group) Standard Industrial Classification (SIC) Code of 49, pertaining to Electric, Gas, and Sanitary Services. Therefore, the last criterion for single installation status has been met. Permit type is based upon the combined landfill/waste to energy installation which is a major source. The combined installation is also subject to NSPS WWW with a design capacity greater than or equal to 2.5 million megagrams and 2.5 million cubic meters, thereby requiring a part 70 permit. Both installations have been issued separate Part 70 Operating Permits. For Central Missouri Sanitary Landfill (159-0055), see OP2018-031 for their most recent operating permit.

Each engine is a 20 cylinder, lean burn, four-stroke, SI RICE. Neither engine is part of a required or voluntary certification program and therefore is classified as non–certified per NSPS JJJJ.

LFG will be conditioned by the landfill to remove leachate and condensate before arriving at Missouri Center for Waste to Energy. Once at Missouri Center for Waste to Energy, the LFG will be further conditioned using an iron sponge to decrease the hydrogen sulfide content. This is done to reduce potential acid formation and subsequent damage to the engines. The construction permit considered hydrogen sulfide reduction an inherent step within the waste to energy process; therefore it was not required by a permit special condition.

LFG fueled engines are subject to variable fuel inputs, atmospheric conditions, and tuning specifications that can cause a range of emission values. In order to not require the engines to operate at a possibly difficult to maintain, precise calibration based upon a one-time performance test, the engines’ potential emissions reflect the higher NSPS standards.
Voluntary NOx and CO limits were taken to avoid ambient air impact quality analysis in the construction permit. A limit for each pollutant is needed because due to the relationship between combustion generated NOx and CO, limiting one does not proportionately reduce the other. Attempting to proportionately reduce either pollutant results in the other pollutant being conditioned almost exactly to the respective de minimis level, with no margin of safety for actual operation variables.

The potential emissions below include the emissions from the Central Missouri Landfill and the Missouri Center for Waste to Energy as they are considered one installation. The potential emissions are the summation of the existing potential emissions from the landfill and the conditioned potential emissions of the waste to energy facility and were pulled from Table 4: Emissions Summary, in construction permit 112012-013. This is a conservative calculation as it assumes all cells have the same closure date and each cell’s LFG generation rate peaks at the same time. The existing potential emissions do not include potential emissions from haul roads and daily cover activities, and including or omitting them does not change permit applicability.

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Potential to Emit for Central Missouri Landfill (^3) (tons/yr)</th>
<th>Potential to Emit for Center for Waste to Energy (^3) (tons/yr)</th>
<th>Total Potential to Emit (^3) (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM(_{10})</td>
<td>3.93</td>
<td>2.67</td>
<td>6.60</td>
</tr>
<tr>
<td>PM(_{2.5})</td>
<td>3.93</td>
<td>2.67</td>
<td>6.60</td>
</tr>
<tr>
<td>Sulfur Oxides (SO(_x))</td>
<td>3.23</td>
<td>1.26</td>
<td>4.49</td>
</tr>
<tr>
<td>Nitrogen Oxides (NO(_x))</td>
<td>9.25</td>
<td>&lt; 40(^4)</td>
<td>49.25(^2)</td>
</tr>
<tr>
<td>Volatile Organic Compounds (VOCs)</td>
<td>213.85</td>
<td>20.00</td>
<td>233.85</td>
</tr>
<tr>
<td>Carbon Monoxide (CO)</td>
<td>173.45</td>
<td>&lt; 100(^5)</td>
<td>273.45(^3)</td>
</tr>
<tr>
<td>Hazardous Air Pollutants (HAPs)</td>
<td>26.9</td>
<td>1.21</td>
<td>28.11</td>
</tr>
<tr>
<td>Non Methane Organic Compounds</td>
<td>251.59</td>
<td>23.53</td>
<td>275.12</td>
</tr>
</tbody>
</table>

\(^3\) Potential Emissions were obtained from construction permit 122013-003, issued December 3, 2013.

\(^4\) Potential NO\(_x\) emissions for Center for Waste to Energy were evaluated with a conditioned limit of 40 tons for EU-01 and EU-02 combined.

\(^5\) Potential CO emissions for Center for Waste to Energy were evaluated with a conditioned limit of 100 tons for EU-01 and EU-02 combined.
Reported Air Pollutant Emissions, tons per year

<table>
<thead>
<tr>
<th>Pollutants</th>
<th>2017</th>
<th>2016</th>
<th>2015(^6)</th>
<th>2014</th>
</tr>
</thead>
<tbody>
<tr>
<td>Particulate Matter ≤ 10 Microns (PM(_{10}))</td>
<td>3.05</td>
<td>3.62</td>
<td>4.20</td>
<td>2.66</td>
</tr>
<tr>
<td>Particulate Matter ≤ 2.5 Microns (PM(_{2.5}))</td>
<td>3.05</td>
<td>3.62</td>
<td>4.20</td>
<td>2.66</td>
</tr>
<tr>
<td>Sulfur Oxides (SO(_x))</td>
<td>0.89</td>
<td>1.05</td>
<td>1.22</td>
<td>1.35</td>
</tr>
<tr>
<td>Nitrogen Oxides (NO(_x))</td>
<td>14.70</td>
<td>17.13</td>
<td>61.87</td>
<td>39.18</td>
</tr>
<tr>
<td>Volatile Organic Compounds (VOCs)</td>
<td>3.61</td>
<td>4.90</td>
<td>30.93</td>
<td>19.58</td>
</tr>
<tr>
<td>Carbon Monoxide (CO)</td>
<td>41.10</td>
<td>45.97</td>
<td>154.68</td>
<td>97.94</td>
</tr>
<tr>
<td>Hazardous Air Pollutants (HAPs)(^7)</td>
<td>1.61</td>
<td>1.61</td>
<td>0.57</td>
<td>0.574</td>
</tr>
<tr>
<td>Benzene 71-43-2 (Hazardous Air Pollutant)</td>
<td>0.09</td>
<td>0.09</td>
<td>0.03</td>
<td>0.03</td>
</tr>
<tr>
<td>Toluene 108-88-3 (Hazardous Air Pollutant)</td>
<td>1.50</td>
<td>1.50</td>
<td>0.54</td>
<td>0.54</td>
</tr>
<tr>
<td>Vinyl Chloride 75-01-4 (Hazardous Air Pollutant)</td>
<td>0.02</td>
<td>0.02</td>
<td>0.02</td>
<td>--</td>
</tr>
</tbody>
</table>

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 29, 2016;
2) 2017 Emissions Inventory Questionnaire, received March 13, 2018;
4) WebFIRE;
5) Construction Permit 122013-003, Issued December 3, 2013

Construction Permit History

The following is a list of construction permits issued to Missouri Center for Waste to Energy (159-0075):

Construction Permit 122013-003, Issued December 3, 2013

This de minimis construction permit was for the construction and installation of two spark ignition reciprocating internal combustion electrical generators, EU-01 and EU-02. It contains 4 special conditions.

- Special Condition 1 has been applied within this permit (see Permit Condition 001). The facility took a 40 ton NO\(_x\) limit in order to avoid modeling and obtained a Section 5 permit instead of a Section 6.

\(^6\) The Air Pollution Control Program is aware that the reported emissions for CO and NO\(_x\) are greater than the limits established by Construction Permit 122013-003. The permittee has worked with the Compliance/Enforcement Section to bring the installation back into compliance.

\(^7\) The HAP emissions are reported as VOCs.
• Special Condition 2 has been applied within this permit (see Permit Condition 002). The facility took a 100 ton CO limit in order to avoid modeling and obtained a section 5 permit instead of a Section 6.
• Special Condition 3 has been incorporated into this operating permit. It contains general recordkeeping and reporting requirements.
• Special Condition 4 has been applied within this permit (see Permit Condition 003). It contains performance testing requirements. The facility stated in the operating permit application that the facility did not conduct the required performance testing required within 180 days after startup as required by Special Condition 4 of Construction Permit 122013-003.

The following list is a list of construction permits issued to Central Missouri Landfill (159-0055) and are included here because both facilities are considered to be one installation. See OP2018-031 for more information:

Construction Permit 102004-007, Issued October 18, 2004
Construction Permit 102004-007A, Issued March 14, 2016
This de minimis construction permit was for a landfill expansion, the amendment was for Haul Road Estimates. The special conditions have been incorporated into OP2018-031.

Construction Permit 112010-009, Issued November 30, 2010
This de minimis construction permit was for a landfill expansion. It contains no special conditions.

Construction Permit 112012-013, Issued November 26, 2012
This de minimis construction permit was for a landfill expansion and flare. It contains no special conditions.

New Source Performance Standards (NSPS) 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.
Maximum Achievable Control Technology (MACT) Applicability


This subpart is applicable to the installation and has been applied within this permit. The installation is a major HAP source. The engines are subject to monitoring, installation, collection, operation and maintenance, initial notification, recordkeeping and reporting requirements.

These stationary RICE do not have to meet the emission limitations and operating limitations of 40 CFR Part 63, Subpart ZZZZ, as the engines are classified as stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions which combusts landfill or digester gas equivalent to 10 percent or more of the gross heat input on an annual basis. [§63.6590(b)(2)]

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

40 CFR 60 Subpart WWW - Standards of Performance for Municipal Solid Waste Landfills

This subpart is applicable to the installation as the Central Missouri Landfill and the Missouri Center for Waste to Energy as one installation. This operating permit is for the Missouri Center for Waste to Energy only. The Operating Permit for the Central Missouri Landfill, OP2018-031, covers the rules and requirements for the landfill.

40 CFR Part 60, Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines

This subpart does not apply. The engines are not compression ignition engines.

40 CFR 60 Subpart JJJJ - Standards of Performance for Stationary Spark Ignition Internal Combustion Engines

This subpart is applicable to the installation and has been applied within this permit. The facility conducted stack testing on June 2, 2017 to meet compliance with the emission limitations of this subpart and Construction Permit 122013-003. Results indicated that they are in compliance with the emission limitations. Testing resulted in 0.89 g/hp-hr NOx, 2.15 g/hp-hr CO, and < 0.01 g/hp-hr VOC for both engines.

Missouri Code of State Regulations (CSR) Applicability

10 CSR 10-6.100, Alternate Emission Limits

This rule is not applicable because the installation is in an ozone attainment area.

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

The installation has a low potential to emit PM; visible emissions beyond the property boundary is not expected. As a result, monitoring/recordkeeping is not required.

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

This rule is not applicable to the installation because the installation has internal combustion engines and is located in Pettis County, which is outside the Kansas City and St. Louis metropolitan areas. 10 CSR 10-6.220(1)(A)
10 CSR 10-6.260, *Restriction of Emission of Sulfur Compounds; and*
This regulation was rescinded from the code of state regulations (CSR). However, this regulation is still contained in Missouri’s State Implementation Plan (SIP). This regulation is a federally enforceable requirement until it is removed from the SIP, therefore it must appear in this Operating Permit. According to both the draft and final versions of AP-42, Section 2.4, Municipal Solid Waste Landfills, the sulfur content of landfill gas can be estimated at approximately 47 ppmv. This much less than the limit imposed by this regulation, therefore no monitoring or recordkeeping is required in this permit.

10 CSR 10-6.261, *Control of Sulfur Dioxide Emissions*
Emission Units EU-01 and EU-02 are landfill gas fired engine generators that have sulfur dioxide emissions. These engines do not meet any of the applicability exemptions under 10 CSR 10-6.261(1)(A) through (C) therefore they are subject to this regulation. General Provisions Section (3) establishes SO₂ emissions based on fuel sulfur content. Subsection (3)(C) includes the fuel sulfur content limits for all units not covered under subsections (3)(A) and (3)(B) and only includes limits on sulfur content for distillate and residual fuel. There are no fuel sulfur limits for the combustion of landfill gas in the regulation, nor are there any monitoring, recordkeeping or reporting requirements for landfill gas fired engines. For this reason, 10 CSR 10-6.261 is not included in the permit as a permit condition; however it does apply to both emission units EU-01 and EU-02.

10 CSR 10-6.360, *Control of NOₓ Emissions From Electric Generating Units and Non-Electric Generating Boilers.*
This rule is not applicable because the installation is located in Pettis County, which is not one of the named counties in the rule.

10 CSR 10-6.390, *Control of NOₓ Emissions From Large Stationary Internal Combustion Engines.*
This rule is not applicable because the installation is located in Pettis County, which is not one of the named counties in the rule.

10 CSR 10-6.400, *Restriction of Emission of Particulate Matter From Industrial Processes*
This rule does not apply to either engine as they are fueled exclusively by a gaseous fuel and air introduced for purposes of combustion, and therefore do not meet the definition of process weight according to 10 CSR 10-6.020(2)(P).

**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 the facility is subject to 40 CFR Part 60, Subpart JJJJ (see Permit Condition 003).
Greenhouse Gas Emissions
Note that this installation 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. If required to report, the applicant is required to report the data directly to EPA. The public may obtain CO₂ emissions data by visiting http://epa.gov/ghgreporting/ghgdata/reportingdatasets.html

Other Regulatory Determinations

Compliance Plan
The installation indicated in their operating permit renewal application that the facility was not in compliance with all applicable requirements when it was submitted in April 2016. In Form OP-E01, the installation laid out a compliance plan in order to bring their installation back into compliance. The compliance plan detailed submitting the required applications and notifications and commencing the required performance testing on the engines. While Compliance Plans are typically incorporated into operating permits, as of the date of this permit, the installation has returned to compliance by following the plan submitted in Form OP-E01. As a result, adding the Compliance Plan into this operating permit was deemed unnecessary.

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

Public comments were received from Mark A. Smith of EPA Region 7 on May 21, 2018. The comments are addressed in the order in which they appear within the letter.

Comment #1:
Form OP-E01, in Application for Authority to Operate submitted by Missouri Center for Waste to Energy received by MoDNR April 29, 2016, indicates the installation is not in compliance with all applicable requirements. Missouri Center for Waste to Energy presents their proposed compliance plan, on Form OP-F01, however, this draft operating permit includes no compliance plan and the Statement of Basis includes no discussion detailing the rationale MoDNR used for excluding the compliance plan. EPA recommends MoDNR include a discussion of the compliance plan in the operating permit and Statement of Basis.

Response #1:
Since submittal of the renewal application in April 2016, the installation has worked with MoDNR to return to compliance with their applicable requirements. As of this permit, the installation returned to compliance after commencing the required performance testing and notification requirements. Because the installation has returned to compliance, no compliance plan was incorporated into this operating permit. A discussion on this topic has been added to the Statement of Basis under Other Regulatory Determinations.

Comment #2:
1) Monitoring/Record keeping requirement 1), in Permit Condition 001, requires the permittee to calculate the 12-month NOx emissions, from EU-01 (1,468 HP; 4SLB; SI RICE) and EU-02 (1,966 HP; 4SLB; SI RICE), using Attachment A or an equivalent form approved by Missouri Department of Natural Resource personnel. Attachment A appears to require a monthly NOx emission calculation and a rolling 12-month total NOx emission determination to verify compliance with the emission limitation of 40.0 tons of NOx in any consecutive 12-month period. EPA recommends MoDNR consider including a more complete and accurate monitoring/record keeping description.
2) Additionally, Attachment A specifies a NOx emission factor, as determined in the most recent performance test, and shows this emission factor in grams/hp. EPA believes this emission factor should be stated as grams/hp-hr, as specified in §60.4244.
3) Finally, the monthly NOx emissions, in tons/month, is calculated for each emission unit using the emission factor developed during the most recent performance test. However, Attachment A does not appear to require the permittee to monitor and record the monthly operating hours of both emission units. It is unclear to EPA, how the permittee determines monthly NOx emissions, using an emission factor in grams/hp-hr, when there is no record of the number of operating hours. Therefore, EPA encourages MoDNR and Missouri Center for Waste to Energy consider revising Attachment A to ensure all data for emission limitation validation is monitored and recorded.

Response #2:
1) Monitoring/Recordkeeping requirement 1) in Permit Condition 001 has been modified to require both monthly and 12-month rolling total NOx emissions tracking.
2) This error was an error in Attachment A. The emission factor units should have read gram/hp-hr. See further discussion in 3) of this response.
3) Attachment A has been changed to have the permittee record the hours the engines have run each month. Rather than using a gram/hp-hr emission factor, which is dependent on an assumed mechanical to electrical efficiency, a more directly correlated emission factor in units of lb/hr is used. These lb/hr emission factors were obtained from the most recent stack tests performed on the engines and are based on a 3-run average of each pollutant’s tested mass emission rate.

Comment #3:
1) Monitoring / Record keeping requirement 1), in Permit Condition 002, requires the permittee to calculate the 12-month CO emissions, from EU-01 (1,468 HP; 4SLB; SI RICE) and EU-02 (1,966 HP; 4SLB; SI RICE), using Attachment B or an equivalent form approved by Missouri Department of Natural Resource personnel. Attachment B appears to require a monthly CO emission calculation and a rolling 12-month total CO emission determination to verify compliance with the emission limitation of 100.0 tons of CO in any consecutive 12-month period. EPA recommends MoDNR consider including a more complete and accurate monitoring/ record keeping description.

2) Additionally, Attachment B specifies a CO emission factor, as determined in the most recent performance test, and shows this emission factor in grams/ hp. EPA believes this emission factor should be stated as grams/ hp-hr, as specified in §60.4244.

3) Finally, the monthly CO emissions, in tons/month, is calculated for each emission unit using the emission factor developed during the most recent performance test. However, Attachment B does not appear to require the permittee to monitor and record the monthly operating hours of both emission units. It is unclear to EPA, how the permittee determines monthly CO emissions, using an emission factor in grams/ hp-hr, when there is no record of the number of operating hours. Therefore, EPA encourages MoDNR and Missouri Center for Waste to Energy consider revising Attachment B to ensure all data for emission limitation validation is monitored and recorded.

Response #3:
1) Monitoring/Recordkeeping requirement 1) in Permit Condition 002 has been modified to require both monthly and 12-month rolling total CO emissions tracking.

2) This error was an error in Attachment B. The emission factor units should have read gram/hp-hr. See further discussion in 3) of this response.

3) Attachment B has been changed to have the permittee record the hours the engines have run each month. Rather than using a gram/hp-hr emission factor which is dependent on an assumed mechanical to electrical efficiency, a more directly correlated emission factor in units of lb/hr is used. These lb/hr emission factors were obtained from the most recent stack tests performed on the engines and are based on a 3-run average of each pollutant’s tested mass emission rate.

Comment #4:
1) Reporting requirement 1) a), in Permit Condition 004, requires the permittee to submit an annual report containing fuel flow rate of each (emphasis added) fuel and the heating values used in calculations and the permittee must demonstrate that the percentage of heat input provided by landfill gas or digester gas (emphasis added) is equivalent to 10 percent or more of the gross heat input on an annual basis. According to the Installation Description in the Statement of Basis, EU-01 and EU-02 are fueled exclusively by landfill gas.

2) Also, reporting requirement 1) b) requires the annual report to include operating limits provided in their federally enforceable permit (emphasis added) and any deviations from these limits. EPA recommends MoDNR consider revising reporting requirement 1) a) such that it refers to landfill gas
exclusively. Also, EPA recommends MoDNR specify the reportable operating limits in reporting requirement 1) b), to eliminate the vagueness and improve the practical enforceability.

Response #4:
1) Reporting requirement 1) a) in Permit Condition 004 has been modified to only refer to landfill gas.
2) Reporting requirement 1) b) in Permit Condition 004 has been modified to refer to the requirements of Permit Condition 004 rather than the operating permit as a whole.

Comment #5:
1) 40 CFR Part 63, Subpart ZZZZ-National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines, in the Maximum Achievable Control Technology (MACT) Applicability section of the Statement of Basis, indicates the Missouri Center for Waste to Energy is a major HAP source. MoDNR’s customary practice is to indicate the pollutants for which the installation is a major source in the Installation Description on the permit cover page. EPA suggests MoDNR consider indicating this installation is a major HAP source on the permit cover page.
2) Additionally, 10 CSR 10-6.260-Restriction of Emission of Sulfur Compounds in the Missouri Code of State Regulations (CSR) Applicability section of the Statement of Basis, indicates this regulation applies to the flare (emphasis added) and appears as a permit condition. Neither the permittee’s Application for Authority to Operate nor the draft operating permit mention the presence of a flare at this installation. EPA suggests MoDNR reconsider the 10 CSR 10-6.260 discussion in the Statement of Basis.

Response #5:
1) The installation description has been modified to state that the installation is a major source of HAPs.
2) The permit has been updated removing mention of the flare. The flare has been taken in account in OP2018-031 for the Central Missouri Sanitary Landfill (159-0055). As discussed in the Statement of Basis, the landfill is considered to be one installation with Missouri Center for Waste to Energy (159-0075).
JUL 31 2018

Mr. John Burns  
Missouri Center for Waste to Energy  
3201 West 16th Street  
Sedalia, MO 65301

Re: Missouri Center for Waste to Energy, 159-0075  
Permit Number: OP2018-065

Dear Mr. Burns:

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:kwj  
Enclosures  

c: PAMS File: 2016-04-054

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