



July 9, 2020

Mike Siefert  
Director of Asset Management  
Missouri Joint Municipal Electric Utility Commission Generating Station #1  
1808 I-70 Drive SW  
Columbia, MO 65203

RE: Operating Permit Applicability  
Project Number: 2019-11-012, Installation ID: 007-0058

Dear Mike Siefert:

The Air Pollution Control Program is in receipt of the Intermediate Operating Permit application submitted on November 7, 2019. During the review of this permit application, it has been determined that the potential emissions from this installation are below major source levels. As a result, this installation is no longer required to obtain an operating permit.

Missouri Joint Municipal Electric Utility Commission (MJMEUC) Generating Station #1 operates one (1) combustion turbine; a Solar Titan 130-19501S Turbine with a heat input of 170 million British thermal units per hour (MMBtu/hr). The turbine is fueled with natural gas. Only pipeline grade natural gas, which has very low sulfur content, is used in this combustion turbine. The following table shows the facility's potential to emit (PTE) and the major source thresholds for each of these pollutants. All figures are in tons per year (tpy).

Pollutant	Potential Emission Rate	Actual Emissions 2017	Major Source Threshold
PM <sub>10</sub> <sup>1</sup>	7.45	5.95	100
PM <sub>2.5</sub> <sup>2</sup>	7.45	5.95	100
Sulfur Oxides	2.53	0.35	100
Nitrogen Oxides	73.72	19.54	100
Carbon Monoxide	61.06	21.51	100
Volatile Organic Compounds	9.75	4.17	100
Hazardous Air Pollutants	0.76	0.00	25

<sup>1</sup>PM<sub>10</sub> - particulate matter less than 10 microns in diameter

<sup>2</sup>PM<sub>2.5</sub> - particulate matter less than 2.5 microns in diameter

Mike Siefert  
Page Two

The potential emissions from an installation must exceed the major source levels before the installation is required to obtain an operating permit. The major source levels for operating permits are 100 tons for criteria pollutants, 10 tons for any individual hazardous air pollutant, and 25 tons for all hazardous pollutants combined. Because the potential emissions from this installation do not exceed the major source thresholds, this installation is not required to obtain an operating permit.

10 CSR 10-6.110 *Reporting Emission Data, Emission Fees, and Process Information* applies because the installation holds construction permits under 10 CSR 10-6.060 Construction Permits Required; the installation will continue to be required to submit emissions reports and emissions fees under this rule. The installation remains obligated to meet 40 CFR Part 60, Subpart KKKK *Standards of Performance for Stationary Combustion Turbines*, all applicable air pollution control rules, Department of Natural Resources' rules, and all other applicable federal, state, or local agency regulations.

Please keep in mind that the only change is that this installation is no longer required to hold an operating permit. Any changes or additions to the installation may trigger the need to apply for and obtain a Permit to Construct; if those changes or additions to the installation cause the potential emissions from the operation of the installation to exceed the major source levels then either an Intermediate or a Part 70 Operating Permit will be required.

A copy of this letter should be kept and be made available to Department of Natural Resources' personnel upon verbal request. If you have any questions regarding this determination, please contact Berhanu Getahun at the St. Louis Regional Office, 7545 S. Lindbergh, Suite 210, St. Louis, MO 63125, or by telephone at (314) 416-2960. You may also contact me with the Department's Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102, or by telephone at (573) 751-4817. Thank you for your time and attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM



Kendall B. Hale  
Permits Section Chief

MBH:bga