



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: OP2018-019

Expiration Date:

Installation ID: ~~157-0028~~ **MAR 21 2023**

Project Number: 2015-02-008

Installation Name and Address

Monroe City Power Plant
200 East Summer Street
Monroe City, MO 63456
Monroe County

Parent Company's Name and Address

City of Monroe City
City of Monroe City PO Box 67
Monroe City MO, 63456

Installation Description:

Monroe City Power Plant operates in Monroe City, Missouri. The facility contains multiple fuel storage tanks, and nine internal combustion engines. All internal combustion engines are operated and maintained as emergency generators. Monroe City Power Plant is limited to 250 tons of NOx emissions by Construction Permit Number: 052002-019.

Prepared by
David Buttig, PE
Operating Permit Unit

Director or Designee
Department of Natural Resources

MAR 21 2018

Effective Date

Table of Contents

I. INSTALLATION EQUIPMENT LISTING	3
EMISSION UNITS WITH LIMITATIONS	3
EMISSION UNITS WITHOUT SPECIFIC LIMITATIONS	3
II. PLANT WIDE EMISSION LIMITATIONS.....	4
PERMIT CONDITION PW001	4
10 CSR 10-060 Construction Permits Required	
Construction Permit Number: 052002-019, Issued on May 01, 2002	4
III. EMISSION UNIT SPECIFIC EMISSION LIMITATIONS	5
PERMIT CONDITION 1	5
10 CSR 10-6.260 Restriction of Emission of Sulfur Compounds	5
PERMIT CONDITION 2	6
40 CFR Part 63 Subpart ZZZZ National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE)	6
IV. CORE PERMIT REQUIREMENTS	9
V. GENERAL PERMIT REQUIREMENTS.....	14
VI. ATTACHMENTS	19

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.

Emission Unit ##	Description
EP-08	Three Diesel Internal Combustion Engines Unit 8: 15.789 MMBtu/hr; Installed 1/1/1988 Unit 9: 15.789 MMBtu/hr; Installed 1/1/1988 Unit 10: 15.789 MMBtu/hr; Installed 1/1/1988
EP-14	Three Dual Fuel Internal Combustion Engines Unit 5: 20.0 MMBtu/hr; Installed 1/1/1985 Unit 6: 20.0 MMBtu/hr; Installed 1/1/1971 Unit 7: 22.0 MMBtu/hr; Installed 1/1/1973
EP-21	One Dual Fuel Internal Combustion Engines Unit 3: 11.634 MMBtu/hr; Installed 1/1/1964
EP-23	Two Diesel Internal Combustion Engines Unit 11: 17.25 MMBtu/hr; Installed 1/1/2005 Unit 12: 17.25 MMBtu/hr; Installed 1/1/2005

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.

Emission Unit ##	Description
EP-01	Two (2) 10,000 Gallon, #2 Distillate Fuel Oil Outdoor Storage Tanks, pre-1971
EP-01	Two (2) 12,500 Gallon, #2 Distillate Fuel Oil Outdoor Storage Tanks, 1983 & 1971
EP-01	Two (2) 15,000 Gallon, #2 Distillate Fuel Oil Outdoor Storage Tanks, pre-1971
EP-07	Seven (7) 250 Gallon, #2 Distillate Fuel Oil Indoor Storage Tanks, 1973 & 1988
EP-07	Two (2) 300 gallon, #2 Distillate Fuel Oil Storage Tanks, 2002

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.

PERMIT CONDITION PW001

10 CSR 10-060 Construction Permits Required

Construction Permit Number: 052002-019, Issued on May 01, 2002

Emission Limitation:

- 1) The permittee shall emit into the atmosphere from the entire installation less than 250 tons of nitrogen oxides (NO_x) in any consecutive 12-month period. [Special Condition 3.A.]
- 2) The permittee shall emit into the atmosphere from the entire installation less than 250 tons of carbon monoxide (CO) in any consecutive 12-month period. [Special Condition 3.B.]

Operational Limitation/Equipment Specifications:

The permittee shall burn only distillate fuel No. 2 or natural gas in the seven existing engines (Units 1 through 10) and only distillate fuel oil No. 2 in the two new engines (Units 3 and 5 through 12). [Special Condition 2]

Monitoring/Recordkeeping/Reporting:

None – See Statement of Basis.

III. Emission Unit Specific Emission Limitations

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

PERMIT CONDITION 1		
10 CSR 10-6.260 Restriction of Emission of Sulfur Compounds		
Emission Unit	Description	Manufacturer/Model#
EP-08	1600 kW Diesel Generator Units 8, 9, and 10; MHDR = 17.38 MMBtu/hr each	Caterpillar, 1988
EP-14	Dual fuel IC engine units 5, 6, and 7; MHDR = 21.64, 22.4, and 24.68 MMBtu/hr, respectively; 68.72 MMBtu/hr total	Fairbanks-Morse: 1985, 1971, and 1973, respectively
EP-21	Dual fuel IC engine unit 3; MHDR = 11.63 MMBtu/hr,	Fairbanks-Morse: 1964
EP-23	Diesel Generator Units 11 and 12; MHDR = 19.35 MMBtu/hr each	Caterpillar 3516B, 2002

Emission Limitation:

Emissions from the engines operation shall not contain more than five hundred parts per million by volume (500 ppmv) of sulfur dioxide or more than thirty-five milligrams per cubic meter (35 mg/m³) of sulfuric acid or sulfur trioxide or any combination of those gases averaged on any consecutive three hour time period.

Monitoring/Recordkeeping:

The permittee shall maintain an accurate record of the sulfur content of fuel used. Fuel purchase receipts, analyzed samples, or certifications that verify the fuel type and sulfur content will be acceptable.

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 days after the exceedance or event causing the exceedance. The permittee shall submit these reports to EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219.
- 2) The permittee shall report any deviations from the monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report (SAM) and annual compliance certification (ACC). The permittee shall submit the SAM and ACC reports to both the EPA Region VII and Air Pollution Control Program's Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov.

PERMIT CONDITION 2		
40 CFR Part 63 Subpart ZZZZ National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE)		
Emission Unit	Description	Manufacturer/Model #
EP-08	1600 kW Diesel Generator Units 8, 9, and 10; MHDR = 17.38 MMBtu/hr each	Caterpillar, 1988
EP-14	Dual fuel IC engine units 5, 6, and 7; MHDR = 21.64, 22.4, and 24.68 MMBtu/hr, respectively; 68.72 MMBtu/hr total	Fairbanks-Morse: 1985, 1971, and 1973, respectively
EP-21	Dual fuel IC engine unit 3; MHDR = 11.63 MMBtu/hr,	Fairbanks-Morse: 1964
EP-23	Diesel Generator Units 11 and 12; MHDR = 19.35 MMBtu/hr each	Caterpillar 3516B, 2002

Maintenance Requirements:

The permittee shall: [Item 4 of Table 2d]

- 1) Change oil and filter every 500 hours of operation or annually, whichever comes first;
- 2) Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and
- 3) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

Fuel Requirements:

The permittee shall use diesel fuel that has a sulfur content of no more than 15 ppm. [§63.6604(b)]

Operational Requirements:

- 1) The permittee shall operate and maintain the stationary RICE according to the manufacturer's emission-related written instructions or develop their own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. [§63.6625(e)]
- 2) The permittee shall install a non-resettable hour meter. [§63.6625(f)]

General Provisions:

The permittee shall comply with each of the General Provisions that apply to the emergency engines as listed in Table 8 of MACT ZZZZ.

Continuous Compliance Requirements:

- 1) The permittee shall demonstrate continuous compliance with each operating limitation and other requirements in this condition according to the methods specified below: [Item 9 of Table 6]
 - a) Operate and maintain the stationary RICE according to the manufacturer's emission-related operation and maintenance instructions; or
 - b) The permittee may develop and follow their own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.
- 2) The permittee shall report each instance in which they did not meet the requirements of this permit condition according to the requirements in §63.6650. [§63.6640(b)]

- 3) The permittee shall report each instance which they did not meet the requirements in Table 8 of MACT ZZZZ that apply. [§63.6640(e)]
- 4) The emergency generator shall be operated according to the following requirements: [§63.6640(f)]
 - a) There is no time limit on the use of the emergency generator in emergency situations. [§63.6640(f)(1)]
 - b) The permittee may operate the emergency generator for any combination of the purposes specified in §63.6640(f)(2)(i) for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by §63.6640(f)(3) counts as part of the 100 hours per calendar year allowed by this paragraph. [§63.6640(f)(2)]
 - i) The emergency generator may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state, or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The permittee may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the permittee maintains records indicating that federal, state, or local standards require maintenance and testing of the emergency generator beyond 100 hours per calendar year. [§63.6640(f)(2)(i)]
 - c) Emergency stationary RICE located at area sources of HAP may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in paragraph §63.6640(f)(2) of this section. Except as provided in §63.6640(f)(4)(i) and (ii) of this section, the 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity. [§63.6640(f)(4)]

Notifications:

The permittee shall submit required notifications as specified in §63.6645.

Recordkeeping:

- 1) The permittee shall keep the following records:
 - a) A copy of each notification and report that they submitted to comply with MACT ZZZZ, including all documentation supporting any Initial Notification or Notification of Compliance Status submitted, according to the requirement in §63.10(b)(2)(xiv). [§63.6655(a)(1)]
 - b) Records of the occurrence and duration of each malfunction of operation (i.e. process equipment) or the air pollution control and monitoring equipment. [§63.6655(a)(2)]
 - c) Records of all required maintenance performed on the air pollution control and monitoring equipment. [§63.6655(a)(4)]
 - d) Records of actions taken during periods of malfunction to minimize emissions in accordance with §63.6605(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. [§63.6655(a)(5)]
- 2) The permittee must keep the records required in Table 6 of MACT ZZZZ to show continuous compliance with each operating limitation that applies. [§63.6655(d)]
- 3) The permittee must keep records of the maintenance conducted on the stationary RICE in order to demonstrate that they operated and maintained the stationary RICE according to their own maintenance plan. [§63.6655(e)]

- 4) The permittee must keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The permittee must document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation. [§63.6655(f)]
- 5) Records may be kept in either written or electronic form and maintained for at least five years.
- 6) These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.

Reporting:

The permittee shall report any deviations of this permit condition to EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, as well as the Air Pollution Control Program, Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102.

IV. Core Permit Requirements

The installation shall comply with each of the following regulations or codes. Consult the appropriate sections in the Code of Federal Regulations (CFR), the Code of State Regulations (CSR), and local ordinances for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued. The following are only excerpts from the regulation or code, and are provided for summary purposes only.

10 CSR 10-6.045 Open Burning Requirements

- 1) General Provisions. The open burning of tires, petroleum-based products, asbestos containing materials, and trade waste is prohibited, except as allowed below. Nothing in this rule may be construed as to allow open burning which causes or constitutes a public health hazard, nuisance, a hazard to vehicular or air traffic, nor which violates any other rule or statute.
- 2) Certain types of materials may be open burned provided an open burning permit is obtained from the director. The permit will specify the conditions and provisions of all open burning. The permit may be revoked if the owner or operator fails to comply with the conditions or any provisions of the permit.

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

- 1) In the event of a malfunction, which results in excess emissions that exceed one hour, the permittee shall submit to the director within two business days, in writing, the following information:
 - a) Name and location of installation;
 - b) Name and telephone number of person responsible for the installation;
 - c) Name of the person who first discovered the malfunction and precise time and date that the malfunction was discovered.
 - d) Identity of the equipment causing the excess emissions;
 - e) Time and duration of the period of excess emissions;
 - f) Cause of the excess emissions;
 - g) Air pollutants involved;
 - h) Estimate of the magnitude of the excess emissions expressed in the units of the applicable requirement and the operating data and calculations used in estimating the magnitude;
 - i) Measures taken to mitigate the extent and duration of the excess emissions; and
 - j) Measures taken to remedy the situation that caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations.
- 2) The permittee shall submit the paragraph 1 information to the director in writing at least ten days prior to any maintenance, start-up or shutdown activity which is expected to cause an excessive release of emissions that exceed one hour. If notice of the event cannot be given ten days prior to the planned occurrence, notice shall be given as soon as practicable prior to the activity.
- 3) Upon receipt of a notice of excess emissions issued by an agency holding a certificate of authority under section 643.140, RSMo, the permittee may provide information showing that the excess emissions were the consequence of a malfunction, start-up or shutdown. The information, at a minimum, should be the paragraph 1 list and shall be submitted not later than 15 days after receipt of the notice of excess emissions. Based upon information submitted by the permittee or any other pertinent information available, the director or the commission shall make a determination whether the excess emissions constitute a malfunction, start-up or shutdown and whether the nature, extent and duration of the excess emissions warrant enforcement action under section 643.080 or 643.151, RSMo.

- 4) Nothing in this rule shall be construed to limit the authority of the director or commission to take appropriate action, under sections 643.080, 643.090 and 643.151, RSMo to enforce the provisions of the Air Conservation Law and the corresponding rule.
- 5) Compliance with this rule does not automatically absolve the permittee of liability for the excess emissions reported.

10 CSR 10-6.060 Construction Permits Required

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

10 CSR 10-6.065 Operating Permits

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

10 CSR 10-6.080 Emission Standards for Hazardous Air Pollutants and 40 CFR Part 61 Subpart M National Emission Standard for Asbestos

The permittee shall follow the procedures and requirements of 40 CFR Part 61, Subpart M for any activities occurring at this installation which would be subject to provisions for 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos.

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 10-6.250 Asbestos Abatement Projects – Certification, Accreditation, and Business Exemption Requirements

This is a State Only permit requirement.

The permittee shall conduct all asbestos abatement projects within the procedures established for certification and accreditation by 10 CSR 10-6.250. This rule requires individuals who work in asbestos abatement projects to be certified by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires training providers who offer training for asbestos abatement occupations to be accredited by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires persons who hold exemption status from certain requirements of this rule to allow the department to monitor training provided to employees.

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”;
 - 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.

10 CSR 10-6.065(6)(C)1.B Permit Duration

10 CSR 10-6.065(6)(E)3.C Extension of Expired Permits

This permit is issued for a term of five years, commencing on the date of issuance. This permit will expire at the end of this period unless renewed. If a timely and complete application for a permit renewal is submitted, but the Air Pollution Control Program fails to take final action to issue or deny the renewal permit before the end of the term of this permit, this permit shall not expire until the renewal permit is issued or denied.

10 CSR 10-6.065(6)(C)1.C General Record Keeping and Reporting Requirements

- 1) Record Keeping
 - a) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
 - b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any Missouri Department of Natural Resources' personnel upon request.
- 2) Reporting
 - a) All reports shall be submitted to the Air Pollution Control Program, Compliance and Enforcement Section, P. O. Box 176, Jefferson City, MO 65102.
 - b) The permittee shall submit a report of all required monitoring by:
 - i) October 1st for monitoring which covers the January through June time period, and
 - ii) April 1st for monitoring which covers the July through December time period.
 - c) Each report shall identify any deviations from emission limitations, monitoring, record keeping, reporting, or any other requirements of the permit, this includes deviations or Part 64 exceedances.
 - d) Submit supplemental reports as required or as needed. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
 - i) Notice of any deviation resulting from an emergency (or upset) condition as defined in paragraph (6)(C)7.A of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two working days after the date on which the emission limitation is exceeded due to the emergency, if the permittee wishes to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and the permittee can identify the cause(s) of the emergency. The permitted installation must show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or requirements in the permit. The notice must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.

- ii) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.
- iii) Any other deviations identified in the permit as requiring more frequent reporting than the permittee's semiannual report shall be reported on the schedule specified in this permit.
- 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.I Reasonably Anticipated Operating Scenarios

None.

10 CSR 10-6.065(6)(C)3 Compliance Requirements

- 1) Any document (including reports) required to be submitted under this permit shall contain a certification signed by the responsible official.
- 2) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized officials of the Missouri Department of Natural Resources, or their authorized agents, to perform the following (subject to the installation's right to seek confidential treatment of information submitted to, or obtained by, the Air Pollution Control Program):
 - a) Enter upon the premises where a permitted installation is located or an emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
 - b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - c) Inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
 - d) As authorized by the Missouri Air Conservation Law, Chapter 643, RSMo or the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the terms of this permit, and all applicable requirements as outlined in this permit.
- 3) All progress reports required under an applicable schedule of compliance shall be submitted semiannually (or more frequently if specified in the applicable requirement). These progress reports shall contain the following:
 - a) Dates for achieving the activities, milestones or compliance required in the schedule of compliance, and dates when these activities, milestones or compliance were achieved, and
 - b) An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measures adopted.
- 4) The permittee shall submit an annual certification that it is in compliance with all of the federally enforceable terms and conditions contained in this permit, including emissions limitations, standards, or work practices. These certifications shall be submitted annually by April 1st, unless the applicable requirement specifies more frequent submission. These certifications shall be submitted to EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, as well as the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and Part 64 exceedances and excursions must be included in the compliance certifications. The compliance certification shall include the following:
 - a) The identification of each term or condition of the permit that is the basis of the certification;
 - b) The current compliance status, as shown by monitoring data and other information reasonably available to the installation;
 - c) Whether compliance was continuous or intermittent;
 - d) The method(s) used for determining the compliance status of the installation, both currently and over the reporting period; and
 - e) Such other facts as the Air Pollution Control Program will require in order to determine the compliance status of this installation.

10 CSR 10-6.065(6)(C)6 Permit Shield

- 1) Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements as of the date that this permit is issued, provided that:
 - a) The applicable requirements are included and specifically identified in this permit, or
 - b) The permitting authority, in acting on the permit revision or permit application, determines in writing that other requirements, as specifically identified in the permit, are not applicable to the installation, and this permit expressly includes that determination or a concise summary of it.
- 2) Be aware that there are exceptions to this permit protection. The permit shield does not affect the following:
 - a) The provisions of section 303 of the Act or section 643.090, RSMo concerning emergency orders,
 - b) Liability for any violation of an applicable requirement which occurred prior to, or was existing at, the time of permit issuance,
 - c) The applicable requirements of the acid rain program,
 - d) The authority of the Environmental Protection Agency and the Air Pollution Control Program of the Missouri Department of Natural Resources to obtain information, or
 - e) Any other permit or extra-permit provisions, terms or conditions expressly excluded from the permit shield provisions.

10 CSR 10-6.065(6)(C)7 Emergency Provisions

- 1) An emergency or upset as defined in 10 CSR 10-6.065(6)(C)7.A shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emissions limitations. To establish an emergency- or upset-based defense, the permittee must demonstrate, through properly signed, contemporaneous operating logs or other relevant evidence, the following:
 - a) That an emergency or upset occurred and that the permittee can identify the source of the emergency or upset,
 - b) That the installation was being operated properly,
 - c) That the permittee took all reasonable steps to minimize emissions that exceeded technology-based emissions limitations or requirements in this permit, and
 - 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 Neal Minor, Mayor. 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

None.

STATEMENT OF BASIS

INSTALLATION DESCRIPTION

Monroe City Power Plant is a peaking plant at Monroe City, Missouri. The facility contains multiple fuel storage tanks, and 9 internal combustion engines. All internal Combustion engines are operated and maintained as emergency generators. Monroe City Power Plant is limited to 250 tons of NOx emissions by Construction Permit Number: 052002-019.

Updated Potential to Emit for the Installation

Pollutant	Potential to Emit (tons/yr) ^{1,2}
PM ₁₀	3.88
PM _{2.5}	3.88
Sulfur Oxides (SO _x)	10.03
Nitrogen Oxides (NO _x) ³	< 250.0
Volatile Organic Compounds	14.57
Carbon Monoxide (CO)	< 250.0
Hazardous Air Pollutants (HAP's)	0.08

¹ Each emission unit was evaluated at 8,760 hours of uncontrolled annual operation unless otherwise noted; the emergency generators were all evaluated at 500 hours of operation.

² Construction Permit 052002-019 shows much higher potential emissions; this is due to potential emissions being calculated assuming the emergency generators were operated 8,760 hours per year.

³ Permit Condition PW001 limits NO_x and CO emissions to less than 250.0 tons/yr.

Reported Air Pollutant Emissions, tons per year

Pollutants	2016	2015	2014	2013	2012
Particulate Matter ≤ Ten Microns (PM ₁₀)	No Production Occurred	No Production Occurred	No Production Occurred	0.01	0.06
Particulate Matter ≤ 2.5 Microns (PM _{2.5})				0.01	--
Sulfur Oxides (SO _x)				0.04	0.06
Nitrogen Oxides (NO _x)				0.61	1.01
Volatile Organic Compounds (VOC)				0.05	0.07
Carbon Monoxide (CO)				0.13	0.22

Changes to Installation Equipment

The following emission units have been listed as inoperable but still on site as of site inspection dated December 21, 2016.

Emission Unit	Description
EP-20	Unit 1: 7.202 MMBtu/hr; Installed 1/1/1940
EP-21	Unit 2: 13.434 MMBtu/hr; Installed 1/1/1955
EP-21	Unit 4: 10.803 MMBtu/hr; Installed 1/1/1958

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 February 03, 2015;
- 2) 2016 Emissions Inventory Questionnaire, received May 04, 2017;
- 3) Construction Permit Number: 052002-019, Issued on May 01, 2002;
- 4) Stack test data from the April 14, 2003 completed stack test; and
- 5) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition.

Other Air Regulations Determined Not to Apply to the Operating Permit

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

10 CSR 10-6.100, *Alternate Emission Limits*

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

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

This regulation does not apply to the internal combustion engines per 10 CSR 10-6.220(1)(A).

Construction Permit History

The following revisions were made to construction permits for this installation:

Construction Permit #0597-014 Issued May 12, 1997

Authorized the operation of previously installed emission units. Emission units include one Fairbanks Morse dual fuel engine and three Caterpillar diesel engines. All special conditions included with this construction permit have been superseded by Construction Permit #052002-019.

Construction Permit #052002-019 Issued May 01, 2002

Authorized the installation of four diesel reciprocating internal combustion engines and four diesel storage tanks. These installed engines were originally installed as peaking units but have since been reclassified as emergency only engines. Permit conditions required the testing of one of the installed engines in order to quantify the CO and NO_x emission rates. The test was conducted on April 14, 2003 and concluded that the emission rates were 1.494 lb/MMBtu NO_x and 0.097 lb/MMBtu CO.

The NO_x and CO emission limitations have been included as Permit Condition PW001. Both criteria pollutants have a potential to emit well below their limitation as demonstrated in Tables 1 and 2 below:

TABLE 1

Engine #	MHDR		¹ NO _x Emission Factor		² PTE	² PTE
					(tons/yr)	(tons/yr)
3	0.085	Mgal/hr	438	Lb/Mgal	9.308	24.282
	0.034	MMft ³ /hr	2840	lb/MMft ³	24.282	
5	0.146	MMBtu/hr	438	Lb/Mgal	15.987	15.987
	0.019	MMft ³ /hr	2840	lb/MMft ³	13.513	
6	0.146	MMBtu/hr	438	Lb/Mgal	15.987	15.987
	0.019	MMft ³ /hr	2840	lb/MMft ³	13.513	
7	0.161	MMBtu/hr	438	Lb/Mgal	17.586	17.586
	0.021	MMft ³ /hr	2840	lb/MMft ³	14.864	
8	0.115	MMBtu/hr	438	Lb/Mgal	12.620	12.620
9	0.115	MMBtu/hr	438	Lb/Mgal	12.620	12.620
10	0.115	MMBtu/hr	438	Lb/Mgal	12.620	12.620
11	0.063	MMBtu/hr	204.68	Lb/Mgal	3.221	3.221
12	0.063	MMBtu/hr	204.68	Lb/Mgal	3.221	3.221
					SUM	118.144

¹ Emission factors for engines 3 and 5 through 10 have been taken from EPA's AP-42 for SCC 20100102 and 20100202. Emission factor for engines 11 through 12 have been taken from stack test data completed April 14, 2003.

² PTE has been evaluated at 500 hours of operation since each engine is classified as emergency.

TABLE 2

Engine #	MHDR		¹ CO Emission Factor		PTE	PTE
					(tons/yr)	(tons/yr)
3	0.085	Mgal/hr	130	Lb/Mgal	2.763	2.763
	0.034	MMft ³ /hr	39.9	lb/MMft ³	0.341	
5	0.146	MMBtu/hr	130	Lb/Mgal	4.745	4.745
	0.019	MMft ³ /hr	39.9	lb/MMft ³	0.190	
6	0.146	MMBtu/hr	130	Lb/Mgal	4.745	4.745
	0.019	MMft ³ /hr	39.9	lb/MMft ³	0.190	
7	0.161	MMBtu/hr	130	Lb/Mgal	5.220	5.220
	0.021	MMft ³ /hr	39.9	lb/MMft ³	0.209	
8	0.115	MMBtu/hr	130	Lb/Mgal	3.746	3.746
9	0.115	MMBtu/hr	130	Lb/Mgal	3.746	3.746
10	0.115	MMBtu/hr	130	Lb/Mgal	3.746	3.746
11	0.063	MMBtu/hr	13.289	Lb/Mgal	0.209	0.209
12	0.063	MMBtu/hr	13.289	Lb/Mgal	0.209	0.209
					SUM	29.127

¹ Emission factors for engines 3 and 5 through 10 have been taken from EPA's AP-42 for SCC 20100102 and 20100202. Emission factor for engines 11 through 12 have been taken from stack test data completed April 14, 2003.

² PTE has been evaluated at 500 hours of operation since each engine is classified as emergency.

For this reason, monitoring, recordkeeping, and reporting is not required since the installation is unable to emit the 250.0 tons limitation.

New Source Performance Standards (NSPS) Applicability

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

This regulation does not apply to the engines because all the engines at the installation were constructed prior to the applicability date of April 01, 2006.

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

This regulation does not apply to the engines because all the engines at the installation were constructed prior to the applicability date of June 12, 2006.

Maximum Achievable Control Technology (MACT) Applicability

40 CFR Part 63 Subpart ZZZZ National Emission Standards for Hazardous Air Pollutants for Stationary Combustion Engines

All internal combustion engines have been classified as emergency only by the May 03, 2013 deadline. The facility submitted the initial notification for this in August of 2010. The requirements for emergency only engines are included in Permit Condition 2.

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

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

Compliance Assurance Monitoring (CAM) Applicability

40 CFR Part 64, *Compliance Assurance Monitoring (CAM)*

The CAM rule applies to each pollutant specific emission unit that:

- Is subject to an emission limitation or standard, and
- Uses a control device to achieve compliance, and
- Has pre-control emissions that exceed or are equivalent to the major source threshold.

40 CFR Part 64 is not applicable because none of the pollutant-specific emission units uses a control device to achieve compliance with a relevant standard.

Other Regulatory Determinations

10 CSR 10-6.260, Restriction of Emission of Sulfur Compounds

This regulation was rescinded by the State of Missouri on November 30, 2015. The regulation remains in this operating permit as it is contained in Missouri's SIP and remains an applicable federal

requirement. This is a federal only requirement. This permit condition will no longer be applicable when EPA takes final action to incorporate 10 CSR 10-6.261 in Missouri's SIP in place of 10 CSR 10-6.260. No action is required on the part of the permittee to remove this permit condition from this operating permit upon the removal of 10 CSR 10-6.260 from the Missouri SIP.

10 CSR 10-6.261, Control of Sulfur Dioxide Emissions

The internal combustion engines are not subject to this regulation since all engines are restricted to combusting natural gas or distillate fuel with a sulfur content less than 15 ppm by MACT ZZZ. This restriction is stricter than the limitation imposed by this regulation and is therefore meets the exception criteria in 10 CSR 10-6.261(1)(C) and does therefore not appear as a permit condition in this operating permit.

Other Regulations Not Cited in the Operating Permit or the Above Statement of Basis

Any regulation which is not specifically listed in either the Operating Permit or in the above Statement of Basis does not appear, based on this review, to be an applicable requirement for this installation for one or more of the following reasons:

1. The specific pollutant regulated by that rule is not emitted by the installation;
2. The installation is not in the source category regulated by that rule;
3. The installation is not in the county or specific area that is regulated under the authority of that rule;
4. The installation does not contain the type of emission unit which is regulated by that rule;
5. The rule is only for administrative purposes.

Should a later determination conclude that the installation is subject to one or more of the regulations cited in this Statement of Basis or other regulations which were not cited, the installation shall determine and demonstrate, to the APCP's satisfaction, the installation's compliance with that regulation(s). If the installation is not in compliance with a regulation which was not previously cited, the installation shall submit to the APCP a schedule for achieving compliance for that regulation(s).

Response to Public Comments

Four comments were received from Leslye Werner, Air Permitting and Compliance Branch Acting Chief on December 14, 2017. The comments are addressed in the order in which they appear within the letter(s).

Comment 1:

This permit, on public notice, is the renewal of the Part 70 Operating Permit issued to Monroe City Power Plant February 11, 2010 with an expiration date of February 10, 2015. In accordance with Missouri Air Pollution Control Regulations, an existing permit remains in effect beyond its expiration date, provided the permittee submits a timely permit renewal application. Reapplication timeliness is defined as no sooner than eighteen (18) months and no later than six (6) months prior to current permit application expiration date. Therefore, the timing window for the renewal application for the Monroe City Power Plant Part 70 Operating Permit was between August 10, 2013 and August 10, 2014. The renewal application, which forms the basis for the operating permit currently on public notice, was received by MoDNR on February 3, 2015 which is outside the time window for permit renewal. Therefore, it would appear as though Monroe City Power Plant operating permit has expired, and this operating permit on public notice may be more appropriately considered as an initial operating permit.

Response to Comment:

The commentator is correct that the application to renew the operating permit was received late, and because it was received late the applicant gave up the application shield. This agency is placing greater emphasis on timely applications going forward and is choosing a period of outreach and education. Because the application was to renew an existing permit, it is considered to be a renewal of an existing permit rather than a subsequent initial permit application, so no change was made due to this comment.

Comment 2:

The Monroe City Power Plant Part 70 Operating Permit, that expired on February 10, 2015, included Permit Condition PW001, which established plant wide nitrogen oxide (NO_x) and carbon monoxide (CO) of less than 250.0 tons in any consecutive 12-month period. According to the Statement of Basis, attached to this draft operating permit on public notice, these NO_x and CO limitations preclude the permittee for monitoring, record keeping and reporting requirements. However, the avoidance protection provided for in Permit Condition PW001 appear to remain in effect, as part of the allowed "permit shield" and the "application shield," so long as the permittee applies for operating permit renewal in a timely manner. As discussed above, the timing of the Monroe City Power Plant Application for Authority to Operate renewal does not appear to be timely and therefore, it appears that the permittee is no longer afforded the application and permit shield protections. Therefore, MoDNR might want to reevaluate whether or not Monroe City Power Plant is allowed to forgo the monitoring, record keeping and reporting relaxation stated in the basis of this operating permit.

Response to Comment:

This method of compliance serves the purpose to demonstrate that the facility is staying within the limitation imposed by the construction permit. No monitoring or recordkeeping is required to demonstrate compliance with Permit Condition PW001 because the potential emissions of NO_x and CO from the installation are well below the construction permit limits. No change was made to the permit due to this comment.

Comment 3:

Section IV: *Core Permit Requirements* includes 10 CSR 10-6.250: *Asbestos Abatement Projects-Certification, Accreditation, and Business Exemption Requirements* incorporating the Asbestos Hazard Emergency Response Act (AHERA) and its regulations for school districts and personnel working on asbestos activities in schools. The requirements associated with 10 CSR 10-6.250 have not been adopted into the EPA approved Missouri State Implementation Plan (SIP) and is therefore a "State Only Requirement," and EPA recommends MoDNR consider adding a "State Only Requirement" designation to 10 CSR 10-6.250.

Response to Comment:

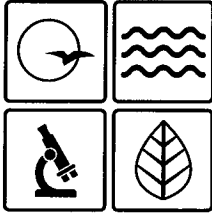
The phrase "State only Requirement" has been added to this requirement in Section IV.

Comment 4:

The *Other Regulatory Determinations* section in the *Statement of Basis* indicates that Monroe City Power Plant is exempt from the requirements of 10 CSR 10-6.261: Control of Sulfur Dioxide Emissions because their internal combustion engines are subject to MACT ZZZZ. 10 CSR 10-6.261 does not appear to allow for any exemptions; however, internal combustion engines that meet the requirements of MACT ZZZZ may already meet the requirements of 10 CSR 10-6.261. Therefore, the requirements of 10 CSR 10-6.261 are subsumed by the requirements in MACT ZZZZ. Also, MoDNR indicates, in *Other Regulatory Determinations* section in the *Statement of Basis* that 10 CSR 10-6.260 is a federally enforceable requirement because it is contained in Missouri's State Implementation Plan (SIP). Somehow this seems to imply that SIP requirements are only enforceable by EPA and not by MoDNR. The definitions included in 10 CSR 10-6.020 indicate that SIP requirements are applicable requirements and therefore, would appear also to be state enforceable. EPA suggests MoDNR consider modifying the *Other Regulatory Determinations* section in the *Statement of Basis*.

Response to Comment:

10 CSR 10-6.261 in the statement of basis has been clarified to state that the regulation does not apply to the generators since they meet the exception criteria contained within the regulation.
10 CSR 10-6.260 in the statement of basis has been updated to further explain the requirements.



Missouri Department of dnr.mo.gov

NATURAL RESOURCES

Eric R. Greitens, Governor

Carol S. Comer, Director

MAR 21 2018

Mr. Neal Minor
Monroe City Power Plant
PO Box 67
Monroe City, MO 63456

Re: Monroe City Power Plant, 137-0028
Permit Number: OP2018-019

Dear Mr. Minor:

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:dbj

Enclosures

c: PAMS File: 2015-02-008



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