



Missouri Department of

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**NATURAL RESOURCES**

Michael L. Parson, Governor

Carol S. Comer, Director

OCT 29 2018

Mr. Matt Lydon  
Director of Regulatory Compliance  
ProEnergy Services  
2001 ProEnergy Boulevard  
Sedalia, MO 65301

RE: New Source Review Temporary Permit Request – Project Number: 2018-09-023

Installation ID Number: 159-0063

Expiration Date: November 1, 2019

Temporary Permit Number: 102018-015

Dear Mr. Lydon:

The Missouri Department of Natural Resources' Air Pollution Control Program has completed a review of your request to temporarily install and operate two diesel-fired generators at ProEnergy Services, located in Sedalia, Missouri. The Air Pollution Control Program is hereby granting your request to conduct this temporary operation at this location in accordance with Missouri State Rule 10 CSR 10-6.060(3).

ProEnergy Services is proposing to perform combustion turbine testing (as described in Construction Permit No. 062018-007), which will require the use of two diesel-fired power generators, TG1 & TG2. The generators will be used to balance operation of plant equipment and are expected to only run during October and November 2018. TG1 has a power output of 950 hp/610 kW and is estimated to run for a total of 350 hours. TG1 will provide power to pumps and run the lubrication oil flushing system prior to combustion turbine operation. TG2 has a power output of 2,990 hp/2,000 kW and is expected to run for a total of 200 hours. TG2 will provide power to the natural gas compressor to operate the combustion turbine.

ProEnergy Services is authorized to construct and operate the two diesel generators, subject to the following conditions:

1. Each generator shall not be operated for greater than 500 hours per consecutive 12-month period. Compliance shall be demonstrated with this condition by keeping a record of the number of hours each generator is in operation.

Potential emissions from the generators were calculated using emission factors taken from AP-42 Section 3.4 – *Large Stationary Diesel and All Stationary Dual-Fuel Engines* (October 1996). It was conservatively assumed that all emitted particulate matter is PM<sub>2.5</sub> and all emitted VOCs are HAPs. Potential emissions were calculated assuming each generator runs for 500 hours per year. A summary of emissions is provided in Table 1.



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Table 1: Emissions Summary (tons per year)

Pollutant	Regulatory De Minimis Levels	Potential Emissions of the Project
PM/PM <sub>10</sub> /PM <sub>2.5</sub>	25.0/15.0/10.0	0.69
SO <sub>x</sub>	40.0	0.08
NO <sub>x</sub>	40.0	23.64
VOC	40.0	0.63
CO	100.0	5.42
Total HAPs	25.0	0.63

Given that the potential emissions are well below 100 tons per year for each pollutant, the proposed temporary permit is granted according to the provisions of Missouri State Rule 10 CSR 10-6.060(3). Subsequent notification should be made to the Air Pollution Control Program within two weeks once temporary operations conclude.

You are still obligated to meet all applicable air pollution control rules, Department of Natural Resources' rules, or any other applicable federal, state, or local agency regulations. Specifically, you should avoid violating 10 CSR 10-6.165 *Restriction of Emission of Odors* and 10 CSR 10-6.220, *Restriction of Emission of Visible Air Contaminants*. 40 CFR 60, Subpart KKKK – *Standards of Performance for Stationary Combustion Turbines* does not apply to the temporary generators because combustion turbine test cells/stands are exempt from the subpart.

A copy of this letter should be kept onsite and be made available to Department of Natural Resources' personnel upon request. If you have any questions regarding this determination, please contact Ryan Schott at the departments' 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



Darcy A. Bybee  
Director

DAB:rsj

c: PAMS File: 2018-09-023  
Kansas City Regional Office