

INTERMEDIATE STATE 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.

Intermediate Operating Permit Number: OP2017-050

Expiration Date: JUN 19 2022

Installation ID: 510-2545

Project Number: 2008-05-061

Installation Name and Address

Southwestern Bell Telephone Company
801 Chestnut, 909 Chestnut, 1010 Pine
Street
St. Louis, MO 63101

Parent Company's Name and Address

AT&T Services, Inc.
P.O. Box 5095 RM 4W200M
San Ramon, CA 94583

Installation Description:

The AT&T Data Center is a synthetic minor source located in the city of St. Louis. The facility provides telecommunication services for the region. In the event of an emergency, emergency generators maintain electrical power to the facility. The emergency generators will be used until conventional electrical power is restored.

The facility is a synthetic minor source for nitrogen oxides (NO_x) and a minor source for all other pollutants. The facility is not a named source.

Prepared by: *BJ*
Bern Johnson
Operating Permit Unit

Kendall B. Halo for
Director or Designee
Department of Natural Resources

JUN 19 2017

Effective Date

Table of Contents

I. INSTALLATION EQUIPMENT LISTING	2
EMISSION UNITS WITH LIMITATIONS	2
EMISSION UNITS WITHOUT SPECIFIC LIMITATIONS	3
II. PLANT WIDE EMISSION LIMITATIONS.....	4
PERMIT CONDITION PW 1	4
10 CSR 10-6.020(2)(I)23. and 10 CSR 10-6.065(5)(C)2. Voluntary Limitation(s)	4
III. EMISSION UNIT SPECIFIC EMISSION LIMITATIONS	5
PERMIT CONDITION 1	5
10 CSR 10-6.060 Construction Permits Required	5
St. Louis City Construction Permit #10-02-005.....	5
10 CSR 10-6.065(2)(C) and 10 CSR 10-6.065(5)(A) Voluntary Limitation(s)	5
PERMIT CONDITION 2	6
10 CSR 10-6.070 New Source Performance Regulations	6
40 CFR Part 60 Subpart IIII - Standards of Performance for Stationary Compression Ignition Internal Combustion Engines ..	6
PERMIT CONDITION 3	8
10 CSR 10-6.075 MAXIMUM ACHIEVABLE CONTROL TECHNOLOGY REGULATIONS.....	8
40 CFR Part 63, Subpart ZZZZ—National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.....	8
IV. CORE PERMIT REQUIREMENTS	11
V. GENERAL PERMIT REQUIREMENTS.....	17
VI. ATTACHMENTS	21
ATTACHMENT A	22
Inspection/Maintenance/Repair/Malfunction Log	22
ATTACHMENT B	23
NOx Compliance Worksheet	23

I. Installation Equipment Listing

EMISSION UNITS WITH LIMITATIONS

The following list provides a description of the equipment at this installation which emits air pollutants and identified as having unit-specific emission limitations.

2016 EIQ Emission Point #	Description
EP-1	Diesel Emergency Generator #1 (801 Chestnut), 18.9 MMBtu/hr
EP-2	Diesel Emergency Generator #2 (801 Chestnut), 18.9 MMBtu/hr
EP-3	Diesel Emergency Generator #3 (801 Chestnut), 18.9 MMBtu/hr
EP-4	Diesel Emergency Generator #1 (909 Chestnut), 6.03 MMBtu/hr
EP-5	Diesel Emergency Generator #2 (909 Chestnut), 6.03 MMBtu/hr
EP-6	Diesel Emergency Generator #3 (909 Chestnut), 6.03 MMBtu/hr
EP-7	Natural Gas Boiler #1 (909 Chestnut), 8.369 MMBtu/hr
EP-8	Natural Gas Boiler #2 (909 Chestnut), 8.369 MMBtu/hr
EP-9	Diesel Emergency Generator #1 (1010 Pine), 14.2 MMBtu/hr
EP-10	Diesel Emergency Generator #2 (1010 Pine), 14.2 MMBtu/hr
EP-11	Diesel Emergency Generator #4 (801 Chestnut), 28 MMBtu/hr
EP-12	Diesel Emergency Generator #5 (801 Chestnut), 28 MMBtu/hr
EP-16	Diesel Emergency Generator #6 (801 Chestnut), 25.02 MMBtu/hr
EP-17	Diesel Emergency Generator #7 (801 Chestnut), 25.02 MMBtu/hr

EMISSION UNITS WITHOUT SPECIFIC LIMITATIONS

The following list provides a description of the equipment, which does not have unit specific limitations at the time of permit issuance.

2016 EIQ Emission Point #	Description
EP-13	750 gallon diesel tank #5 (801 Chestnut)
	750 gallon diesel tank #6 (801 Chestnut)
	12,000 gallon diesel tank #1 (801 Chestnut)
	12,000 gallon diesel tank #2 (801 Chestnut)
	12,000 gallon diesel tank #3 (801 Chestnut)
	12,000 gallon diesel tank #4 (801 Chestnut)
	500 gallon lube oil tank (801 Chestnut)
EP-14	250 gallon diesel day tank (909 Chestnut)
	5,000 gallon diesel tank (909 Chestnut)
EP-15	660 gallon diesel day tank (1010 Pine)
	10,000 gallon diesel tank #1 (1010 Pine)
	10,000 gallon diesel tank #2 (1010 Pine)

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 on the date of permit issuance. 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 PW 1

10 CSR 10-6.020(2)(I)23. and 10 CSR 10-6.065(5)(C)2. Voluntary Limitation(s)

Emission Limitation:

The permittee shall emit less than 100 tons of nitrogen oxides (NO_x) per rolling 12-month period from the entire installation.

Monitoring/Recordkeeping:

- 1) The permittee shall keep monthly records to determine NO_x emissions. The permittee shall calculate NO_x emissions over rolling 12-month periods. The permittee shall use Attachment B, or its equivalent, for this calculation.
- 2) Records may be kept electronically or in paper form.
- 3) The permittee shall maintain all records required by this permit for not less than five years and shall make such records available to any Department of Natural Resources' personnel upon request.

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program's Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the end of the month during which the permittee determines that the installation exceeded the emission limitation listed above.
- 2) Reports of any deviations from monitoring, other than the recordkeeping and reporting requirements of this permit condition, shall be submitted in the annual compliance certification, as required by Section V of this permit.

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 on the date of permit issuance.

PERMIT CONDITION 1		
10 CSR 10-6.060 Construction Permits Required St. Louis City Construction Permit #10-02-005 10 CSR 10-6.065(2)(C) and 10 CSR 10-6.065(5)(A) Voluntary Limitation(s)		
Emission Unit	Description	Rating (bhp)
EP-16	Diesel Emergency Generator #6 (801 Chestnut), 25.02 MMBtu/hr, Installed 2013	4,060
EP-17	Diesel Emergency Generator #7 (801 Chestnut), 25.02 MMBtu/hr, Installed 2013	4,060

Operational Standards:

The permittee shall operate these generators for no more than 340 hours per rolling 12-month period each.

Monitoring/Record Keeping:

- 1) The permittee shall record monthly and rolling 12-month operating hours for each of these generators. Records may be kept electronically or in paper form.
- 2) The permittee shall maintain all records required by this permit for not less than five years and shall make such records available to any Department of Natural Resources' personnel upon request.

Reporting:

Reports of any deviations from monitoring, other than the recordkeeping and reporting requirements of this permit condition, shall be submitted in the annual compliance certification, as required by Section V of this permit.

PERMIT CONDITION 2		
10 CSR 10-6.070 New Source Performance Regulations		
40 CFR Part 60 Subpart III - Standards of Performance for Stationary Compression Ignition Internal Combustion Engines		
Emission Unit	Description	Rating (bhp)
EP-16	Diesel Emergency Generator #6 (801 Chestnut), 25.02 MMBtu/hr, Installed 2013	4,060
EP-17	Diesel Emergency Generator #7 (801 Chestnut), 25.02 MMBtu/hr, Installed 2013	4,060

Emission Standards:

The permittee shall comply with the following emission standards for new nonroad CI engines (from Table 1 to Subpart I) in g/KW-hr (g/HP-hr): [§60.4205(b)]

- a) HC – 1.3 (1.0)
- b) NO_x – 9.2 (6.9)
- c) CO – 11.4 (8.5)
- d) PM – 0.54 (0.40)

Operational Standards:

- 1) The permittee shall operate and maintain these units so that they achieve the emission standards in **Emission Standards:** over the entire life of the engine. [§60.4206]
- 2) Each unit shall have a functional non-resettable hour meter. [§60.4209(a)]
- 3) The permittee shall operate and maintain these units according to the manufacturer's emission-related written instructions. [§60.4211(a)]

Compliance Requirements:

- 1) The permittee shall operate the emergency stationary ICE according to the requirements in a) through c) below. In order for the engine to be considered an emergency stationary ICE under Subpart III, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year is prohibited. If the permittee does not operate the engine according to these requirements, the engine will not be considered an emergency engine and shall meet all requirements for non-emergency engines. [§60.4211(f)]
 - a) There is no time limit on the use of emergency stationary ICE in emergency situations. [§60.4211(f)(1)]
 - b) The permittee may operate the emergency stationary ICE for a maximum of 100 hours per calendar year for the following purpose: [§60.4211(f)(2)]
 - i) Emergency stationary ICE 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 Director 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 emergency ICE beyond 100 hours per calendar year. [§60.4211(f)(2)(i)]

- c) Emergency stationary ICE 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 in 1)b)i) above. Except as provided in in i) below, the 50 hours per calendar 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. [§60.4211(f)(3)]
- i) The 50 hours per year for non-emergency situations can be used to supply power as part of a financial arrangement with another entity if all of the following conditions are met: [§60.4211(f)(3)(i)]
- (1) The engine is dispatched by the local balancing authority or local transmission and distribution system operator; [§60.4211(f)(3)(i)(A)]
 - (2) The dispatch is intended to mitigate local transmission and/or distribution limitations so as to avert potential voltage collapse or line overloads that could lead to the interruption of power supply in a local area or region. [§60.4211(f)(3)(i)(B)]
 - (3) The dispatch follows reliability, emergency operation or similar protocols that follow specific NERC, regional, state, public utility commission or local standards or guidelines. [§60.4211(f)(3)(i)(C)]
 - (4) The power is provided only to the facility itself or to support the local transmission and distribution system. [§60.4211(f)(3)(i)(D)]
 - (5) The permittee identifies and records the entity that dispatches the engine and the specific NERC, regional, state, public utility commission or local standards or guidelines that are being followed for dispatching the engine. The local balancing authority or local transmission and distribution system operator may keep these records on behalf of the permittee. [§60.4211(f)(3)(i)(E)]
- 2) If the permittee does not operate and maintain the engine and control device according to the manufacturer's emission-related written instructions, or the permittee changes emission-related settings in a way that is not permitted by the manufacturer, the permittee shall demonstrate compliance as follows: [§60.4211(g)]
- a) For a stationary CI internal combustion engine greater than 500 HP, 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. In addition, it must conduct an initial performance test to demonstrate compliance with the applicable emission standards within 1 year of startup, or within 1 year after an engine and control device is no longer installed, configured, operated, and maintained in accordance with the manufacturer's emission-related written instructions, or within 1 year after it changes emission-related settings in a way that is not permitted by the manufacturer. It must conduct subsequent performance testing every 8,760 hours of engine operation or 3 years, whichever comes first, thereafter to demonstrate compliance with the applicable emission standards.[§60.4211(g)(3)]

Recordkeeping Requirements:

- 1) The permittee shall keep records of the maintenance conducted on these units in order to demonstrate that they were operated and maintained according to the permittee's own maintenance plan. Attachment A or its equivalent may be used for this record.
- 2) The permittee shall keep records of the hours of operation of the engine that are recorded through the non-resettable hour meter. The permittee shall 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.

- 3) The permittee shall maintain all records onsite for a minimum of five years and make them available to Department of Natural Resources personnel upon request.

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program’s Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the end of the month during which the permittee determines that the emission unit(s) exceeded an emission limit.
- 2) The permittee shall report any deviations from the emission limitation, operational limitation, monitoring, recordkeeping, and reporting requirements of this permit condition in the annual monitoring report required by Section V of this permit.

PERMIT CONDITION 3			
10 CSR 10-6.075 Maximum Achievable Control Technology Regulations 40 CFR Part 63, Subpart ZZZZ—National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines			
Emission Unit	Description	HP	Manufacturer/ Model#
EP-1	Diesel Emergency Generator, 2.0 MW, Installed 1992	2682	Caterpillar-3608
EP-2	Diesel Emergency Generator, 2.0 MW, Installed 1992	2682	Caterpillar-3608
EP-3	Diesel Emergency Generator 2.0 MW, Installed 1992	2682	Caterpillar-3608
EP-4	Diesel Emergency Generator, 600 kW, Installed 1984	804	Cummins
EP-5	Diesel Emergency Generator, 600 kW, Installed 1984	804	Cummins
EP-6	Diesel Emergency Generator, 600 kW, Installed 1984	804	Cummins
EP-9	Diesel Emergency Generator, 1500 kW, Installed 2003	2011	Cummins-DFLA
EP-10	Diesel Emergency Generator, 1500 kW, Installed 2003	2011	Cummins-DFLA
EP-11	Diesel Emergency Generator, 2.7 MW, Installed 2004	3620	Cummins-DQLA
EP-12	Diesel Emergency Generator, 2.7 MW, Installed 2004	3620	Cummins-DQLA

Operational Standards:

- 1) The permittee shall operate the emergency stationary RICE according to the requirements in a) through c) below. In order for the engine to be considered an emergency stationary RICE under 40 CFR 63 Subpart ZZZZ, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year is prohibited. [§63.6640(f)]
 - a) There is no time limit on the use of emergency stationary RICE in emergency situations. [§63.6640(f)(1)]

- b) The permittee may operate the emergency stationary RICE for the purpose specified in i) below for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by c) below count as part of the 100 hours per calendar year allowed. [§63.6640(f)(2)]
 - i.) Emergency stationary RICE 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 emergency RICE 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). Except as provided in i) below, 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)]
 - i.) The 50 hours per year for non-emergency situations can be used to supply power as part of a financial arrangement with another entity if all of the following conditions are met:
[§63.6640(f)(4)(ii)(A) through (E)]
 - (1) The engine is dispatched by the local balancing authority or local transmission and distribution system operator.
 - (2) The dispatch is intended to mitigate local transmission and/or distribution limitations so as to avert potential voltage collapse or line overloads that could lead to the interruption of power supply in a local area or region.
 - (3) The dispatch follows reliability, emergency operation or similar protocols that follow specific NERC, regional, state, public utility commission or local standards or guidelines.
 - (4) The power is provided only to the facility itself or to support the local transmission and distribution system.
 - (5) The permittee identifies and records the entity that dispatches the engine and the specific NERC, regional, state, public utility commission or local standards or guidelines that are being followed for dispatching the engine. The local balancing authority or local transmission and distribution system operator may keep these records on behalf of the engine permittee.
- 2) If the permittee does not operate the engine according to the requirements in 1)a) through c) above, the engine will not be considered an emergency engine under 40 CFR 63 Subpart ZZZZ and must meet all requirements for non-emergency engines. [§63.6640(f)]
- 3) The permittee must operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop a 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.

Monitoring/Recordkeeping:

- 1) The permittee shall record monthly and rolling 12-month operating hours for each of these generators. Records may be kept electronically or in paper form.

- 2) The permittee shall maintain an operating and maintenance log using Attachment A or an equivalent.
- 3) These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
- 4) All records must be maintained for five years.

Reporting:

Reports of any deviations from monitoring, other than the recordkeeping and reporting requirements of this permit condition, shall be submitted in the annual compliance certification, as required by Section V of this permit.

IV. Core Permit Requirements

The installation shall comply with each of the following requirements. Consult the appropriate sections in the Code of Federal Regulations (CFR), 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 on the date of permit issuance. 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 10-6.100 Alternate Emission Limits

Proposals for alternate emission limitations shall be submitted on Alternate Emission Limits Permit forms provided by the department. An installation owner or operator must obtain an Alternate Emission Limits Permit in accordance with 10 CSR 10-6.100 before alternate emission limits may become effective.

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 submit a full EIQ for the 2017 and 2020 reporting years. In the interim years the installation may submit a Reduced Reporting Form; however, if the installation's emissions increase or decrease by more than five tons when compared to their last submitted full EIQ, the installation shall submit a full EIQ rather than a Reduced Reporting Form.

- 4) In addition to the EIQ submittal schedule outlined above, any permit issued under 10 CSR 10-6.060 section (5) or (6) triggers a requirement that a full EIQ be submitted in the first full calendar year after the permitted equipment initially operates.

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 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.

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.

Monitoring:

The permittee shall conduct inspections of its facilities sufficient to determine compliance with this regulation. If the permittee discovers a violation, the permittee shall undertake corrective action to eliminate the violation.

The permittee shall maintain the following monitoring schedule:

- 1) The permittee shall conduct weekly observations for a minimum of eight (8) consecutive weeks after permit issuance.
- 2) Should no violation of this regulation be observed during this period then-
 - a) The permittee may observe once every two (2) weeks for a period of eight (8) weeks.
 - b) If a violation is noted, monitoring reverts to weekly.
 - c) Should no violation of this regulation be observed during this period then-
 - i) The permittee may observe once per month.
 - ii) If a violation is noted, monitoring reverts to weekly.
- 3) If the permittee reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner to the initial monitoring frequency.

Recordkeeping:

The permittee shall document all readings on Attachment B, or its equivalent, noting the following:

- 1) Whether air emissions (except water vapor) remain visible in the ambient air beyond the property line of origin.
- 2) Whether equipment malfunctions contributed to an exceedance.
- 3) Any violations and any corrective actions undertaken to correct the violation.

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

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"; 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.

10 CSR 10-5.040 Use of Fuel in Hand-Fired Equipment Prohibited

No owner or operator shall operate applicable hand-fired fuel burning equipment unless the owner or operator meets the conditions set forth in 10 CSR 10-5.040. This regulation shall apply to all hand-fired fuel-burning equipment at commercial facilities including, but not limited to, furnaces, heating and cooking stoves and hot water furnaces. It shall not apply to wood-burning fireplaces and wood-burning stoves in dwellings, nor to fires used for recreational purpose, nor to fires used solely for the preparation of food by barbecuing or to other equipment exempted under 10 CSR 10-5.040. Hand-fired fuel-burning equipment is any stove, furnace, or other fuel-burning device in which fuel is manually introduced directly into the combustion chamber.

10 CSR 10-5.060 Refuse Not to be Burned in Fuel Burning Installations (Rescinded on February 11, 1979, Contained in State Implementation Plan)

No person shall burn or cause or permit the burning of refuse in any installation which is designed for the primary purpose of burning fuel.

10 CSR 10-5.120 Information on Sales of Fuels to be Provided and Maintained

Every delivery of coal or residual fuel oil when first delivered to a consumer or wholesaler in the St. Louis metropolitan area must be accompanied by a ticket prepared in triplicate and containing at least the name and address of the seller and the buyer; the grade of fuel; ash content of coal, the source of the fuel, which must be an approved source, and such other information as the Air Conservation Commission may require. One copy of each ticket shall be kept by the person delivering the fuel and be

retained for one year; one copy is to be given to the recipient of the fuel to be retained for one year; and, upon request, within 30 days after delivery of the fuel, the delivering party shall mail one copy to the Air Conservation Commission.

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, §(5)(C)1 and §(6)(C)1.B Permit Duration 10 CSR 10-6.065, §(5)(E)2.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, §(5)(C)1 and §(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) April 1st for monitoring which covers the January through December time period.
 - ii) Exception. Monitoring requirements which require reporting more frequently than annually shall report no later than 30 days after the end of the calendar quarter in which the measurements were taken.
 - c) Each report shall identify any deviations from emission limitations, monitoring, record keeping, reporting, or any other requirements of the permit.
 - 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 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 annual report shall be reported on the schedule specified in this permit, and no later than ten days after any exceedance of any applicable rule, regulation, or other restriction.
- 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 §(5)(C)1 and §(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(5)(C)1.A 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 under this rule.
- 6) Failure to comply with the limitations and conditions that qualify the installation for an Intermediate permit make the installation subject to the provisions of 10 CSR 10-6.065(6) and enforcement action for operating without a valid part 70 operating permit.

10 CSR 10-6.065(5)(C)1.C Reasonably Anticipated Operating Scenarios

None

10 CSR 10-6.065, §(5)(B)4; §(5)(C)1, §(6)(C)3.B; and §(6)(C)3.D; and §(5)(C)3 and §(6)(C)3.E.(I) – (III) and (V) – (VI) 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 the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and exceedances 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, §(5)(C)1 and §(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(5)(C)5 Off-Permit Changes

- 1) Except as noted below, the permittee may make any change in its permitted installation's operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. 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 a Title I modification; Please Note: Changes at the installation which affect the emission limitation(s) classifying the installation as an intermediate source (add additional equipment to the record keeping requirements, increase the emissions above major source level) do not qualify for off-permit changes.
 - 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 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; and
 - 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.

10 CSR 10-6.020(2)(R)34 Responsible Official

The application utilized in the preparation of this permit was signed by the Responsible Official designated for the installation at the time of submittal. Don Harris, Assistant Secretary, is the current Responsible Official for the installation. 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 §(5)(E)4 and §(6)(E)6.A(III)(a)-(c) Reopening-Permit for Cause

This permit may be reopened for cause if:

- 1) The Missouri Department of Natural Resources (MDNR) 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,
- 2) 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,
- 3) MDNR or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

10 CSR 10-6.065 §(5)(E)1.A and §(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 B
 NOx Compliance Worksheet

This worksheet covers the month of _____
 (month/year)

Emission Point	Description	¹ Monthly Usage	Units	² Emission Factor (lbs NOx/unit)	³ Total Monthly Emissions (tons/month)
EP-7 & -8	boilers – natural gas ⁴	16.74 max	MMBTU/hr	100	0.60
EP-1	diesel emergency gen		hours	40.82	
EP-2	diesel emergency gen		hours	18.90	
EP-3	diesel emergency gen		hours	46.88	
EP-4	diesel emergency gen		hours	19.30	
EP-5	diesel emergency gen		hours	19.30	
EP-6	diesel emergency gen		hours	19.30	
EP-9	diesel emergency gen		hours	45.44	
EP-10	diesel emergency gen		hours	45.44	
EP-11	diesel emergency gen		hours	75.52	
EP-12	diesel emergency gen		hours	56.64	
EP-16	diesel emergency gen		hours	90.94	
EP-17	diesel emergency gen		hours	90.94	
⁵Total Monthly Installation-Wide NOx Emissions (tons)					
⁶Total 12-Month Rolling Installation-Wide NOx Emissions (tons)					

¹ Enter total amount of fuel (indicated in the next column) used in month.

² Emission factor sources is AP-42 Chapter 3 SCC 20200401 & 10200602.

³ Total monthly emissions = Monthly Usage x Emission Factor x 0.0005.

⁴ Potential natural gas emissions are 16.74 mmBTU/month / 1020 mmft³/mmBTU * 100 lbs NOx/mmft³ * 0.0005 tons/lb = 0.599 tons NOx/month

⁵Total installation emissions are the sum of the total monthly emissions for each emission point.

⁶12-Month Rolling NOx Emissions = Sum of twelve most recent Combined NOx Compliance Worksheets.

12-Month Rolling Total NOx Emissions less than 100 tons/yr indicates compliance.

STATEMENT OF BASIS

Voluntary Limitations

In order to qualify for this Intermediate State Operating Permit, the permittee has accepted voluntary, federally enforceable emission limitations. Per 10 CSR 10-6.065(5)(C)1.A.(VI), if these limitations are exceeded, the installation immediately becomes subject to 10 CSR 10-6.065(6) and enforcement action for operating without a valid part 70 operating permit. It is the permittee's responsibility to monitor emission levels and apply for a part 70 operating permit far enough in advance to avoid this situation. This may mean applying more than eighteen months in advance of the exceedance, since it can take that long or longer to obtain a part 70 operating permit.

INSTALLATION DESCRIPTION

The installation is a collection of office buildings where the contiguous properties under the same parent company are considered one installation. Sources at this installation include heating boilers, emergency generators, and fuel oil tanks. The facility is a synthetic minor emissions source of nitrogen oxides (NO_x) by taking a voluntary limit of less than 100 tons per year of NO_x.

Updated Potential to Emit for the Installation

Pollutant	Potential to Emit (tons/yr) ¹
CO	48.82
HAP	0.21
NO _x	149.54
PM ₁₀	4.01
PM _{2.5}	3.96
SO _x	2.58
VOC	6.03

Each boiler was evaluated at 8,760 hours of uncontrolled annual operation. Each emergency generator was evaluated at 500 hours of uncontrolled annual operation. Emissions from storage tanks are negligible, based on size and contents, and not included in the total potential emission.

Reported Air Pollutant Emissions, tons per year

Pollutants	2016	2015	2014	2013	2012
PM ₁₀	0.03	0.36	0.03	0.04	0.08
PM _{2.5}	0.03	0.36	0.03	0.04	0.08
SO _x	0.01	0.01	0.01	0.01	0.01
NO _x	0.34	7.28	0.40	0.50	1.07
VOC	0.02	0.32	0.02	0.03	0.06
CO	0.28	4.26	0.34	0.42	0.90
HAPs	0.01	0.08	0.01	0.01	0.02

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) Intermediate Operating Permit Application, received May 22, 2008; revised June 16, 2008;
- 2) 2015 Emissions Inventory Questionnaire, received March 3, 2016;
- 3) St. Louis City construction permit #10-02-005; issued July 6, 2010;
- 4) WebFIRE; and
- 5) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition.

Applicable Requirements Included in the Operating Permit but Not in the Application or Previous Operating Permits

In the operating permit application, the installation indicated they were not subject to the following regulation(s). However, in the review of the application, the agency has determined that the installation is subject to the following regulation(s) for the reasons stated.

40 CFR Part 63 Subpart ZZZZ - *National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*. This regulation was promulgated after the application was submitted. All diesel generators are subject to the operational requirements of emergency generators. (see Permit Condition 2 and 3).

Other Air Regulations Determined Not to Apply to the Operating Permit

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

10 CSR 10-6.220 *Restriction of Emission of Visible Air Contaminants* – This regulation is not applicable to the facility's emergency generator engines as internal combustion engines are exempt per 10 CSR 10- 6.220(1)(A). This regulation is also not applicable to the facility's boilers per 10 CSR 10-6.220(1)(L) as they burn only natural gas.

Construction Permit History

St. Louis City construction permit #10-02-005; issued July 6, 2010 – installation of EP-16 & -17.

New Source Performance Standards (NSPS) Applicability

40 CFR Part 60 Subpart D, Da, Db, and Dc – none of these Subparts applies to the steam generation units at this installation since all steam generation units have maximum heat inputs of 8.396 MMBTU/hr, which are less than the applicability thresholds of these various subparts.

40 CFR Part 60 Subpart K, Ka, and Kb – none of these Subparts applies to any of the storage tanks located at this installation. The largest tanks are the 12,000 gallon diesel storage tanks located at 801 Chestnut. Subpart Kb is applicable to volatile organic liquid storage tanks with a capacity greater than or equal to 19,812.9 gallons. Subpart K and Ka are applicable to tanks storing a petroleum liquid with a capacity greater than or equal to 40,000 gallons. Therefore, the tanks at this installation do not fit the capacity requirements of these subparts.

40 CFR Part 60 Subpart IIII — *Standards of Performance for Stationary Compression Ignition Internal Combustion Engines* – emergency generators EP1 – 12 were built and installed before the applicable dates in Table 3. EP-16 & -17 are subject to Subpart IIII (see Permit Condition 3).

Maximum Achievable Control Technology (MACT) Applicability

40 CFR Part 63 Subpart DDDDD — *National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters* – Southwest Bell is not a major source for HAPs; therefore, Subpart DDDDD does not apply.

40 CFR Part 63 Subpart ZZZZ — *National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines* – For EP-16 & -17, compliance with Subpart ZZZZ is achieved through compliance with Subpart IIII in Permit Condition 3.

40 CFR Part 63 Subpart JJJJJJ – *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources* does not apply because the boilers, EP-7 and -8, are gas-fired [§63.11195(e)].

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

None

Other Regulatory Determinations

10 CSR 10-6.260, *Restriction of Emission of Sulfur Compounds* and 10 CSR 10-6.261, *Control of Sulfur Dioxide Emissions* – The facility is subject to the rule. However EP-7 Natural Gas Boiler #1 and EP-8 Natural Gas Boiler #1 are exempt from the rule since they meet the exemption in 10 CSR 10-6.261(1)(A) since they are fueled exclusively with natural gas. Combustion equipment that uses exclusively pipeline grade natural gas as defined in 40 CFR 72.2 or liquefied petroleum gas as defined by American Society for Testing and Materials (ASTM), or any combination of these fuels are exempt from the requirements of these rules [(1)(A)(2) and (1)(A)].

Diesel generators (EP-1, EP-2, EP-3, EP-4, EP-5, EP-6, EP-9, EP-10, EP-11, EP-12, EP-16, and EP-17) are subject, but because federal rules restrict sulfur content of fuel to less than defined in 3(c), they are deemed continuously in compliance.

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 Air Pollution Control Program'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

A draft of the Intermediate Operating Permit for AT&T Services, Inc was placed on public notice on April 28, 2017, by the Missouri Department of Natural Resources (MDNR). Comments were received from Ms. Julianne Barnum of EH&S Environmental Services. The eight comments are addressed in the order in which they appear within the letter.

Comment #: 1

Cover Page : The parent company's address must include both the PO Box number and the room number. Please update to the following address:

AT&T Services, Inc.
P.O. Box 5095 Rm 4W200M
San Ramon, CA 94583

Response to Comment:

The requested correction was made.

Comment #: 2

The permit pages are currently numbered using "SB-1", "SB- 2", The page numbers for the permit should not contain "SB" as that is reserved for the Statement of Basis portion of the permit, which should start with "SB-1".

Response to Comment:

The requested correction was made.

Comment #: 3

Permit Condition PW1, Reporting Condition 1: "...no later than ten days after **then** end of the month..." should read "...no later than ten days after **the** end of the month..." [emphasis added].

Response to Comment:

The requested correction was made.

Comment #: 4

General Permit Requirements, 10 CSR 10-6.020(2)(R)34 Responsible Official : "The application utilized in the preparation of this permit was signed by Don Harris, Assistant Secretary." should read "The application utilized in the preparation of this permit was signed by the Responsible Official designated for the installation at the time of submittal. Don Harris, Assistant Secretary, is the current Responsible Official for the installation."

Response to Comment:

The requested correction was made.

Comment #: 5

Statement of Basis, page SB-24: The PM2.5 potential to emit in the "Updated Potential to Emit for the Installation" table is 3.96 tpy.

Response to Comment:

The requested correction was made.

Comment #: 6

Statement of Basis, page SB-24: The SOx emissions for 2013, 2014, and 2016 in the "Reported Air Pollutant Emissions, tons per year" table is 0.00. The actual reported values were 0.0030, 0.0020, and 0.0020, respectively.

Response to Comment:

The requested correction was made.

Comment #: 7

Statement of Basis, page SB-24: Please update the 2015 emissions in the "Reported Air Pollutant Emissions, tons per year" table once the revisions have been finalized, and remove the asterisk (*) note.

Response to Comment:

The requested correction was made.

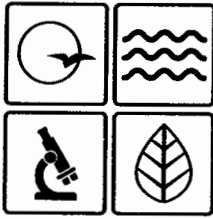
Comment #: 8

Statement of Basis, page SB-25: Please update the language regarding 10 CSR 10-6.220 under the "Other Regulations Determined Not to Apply to the Operating Permit" section to the following:

- 10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants - This regulation is not applicable to the facility's emergency generator engines as internal combustion engines are exempt per 10 CSR 10-6.220(1)(A). This regulation is also not applicable to the facility's boilers per 10 CSR 10-6.220(1)(L) as they burn only natural gas.

Response to Comment:

The requested correction was made.



Missouri Department of dnr.mo.gov

NATURAL RESOURCES

Eric R. Greitens, Governor

Carol S. Comer, Director

JUN 19 2017

Mr. Don Harris
Southwestern Bell Telephone Company
1458 Bluebell Dr.
Livermore, MO 94551

Re: Intermediate Operating Permit
Installation ID: 510-2545, Permit Number: OP2017-050

Dear Mr. Harris:

Enclosed with this letter is your intermediate 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 (30) days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If you send your appeal by registered or certified mail, we will deem it filed on the date you mailed it. If you send your appeal by a method other than registered or certified mail, we will deem it filed on the date the AHC receives it.

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/bjj

Enclosures

c: PAMS File: 2008-05-061

