



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: OP2015-011
Expiration Date: MAY 14 2020
Installation ID: 079-0027
Project Number: 2014-06-037

Installation Name and Address

Trenton Municipal Utilities
PO Box 108
Trenton, MO 64683
Grundy County

Installation Description:

The permittee operates two (2) electric generating substations within the city limits of Trenton, Missouri. The substations are identified as North and South Substations. The North Substation, located at 921 Industrial Drive, has five (5) diesel engine generators that have been in operation since 1974. The South Substation, located at 1st Street & Johnson Drive, has seven (7) diesel engine generators that began operation starting in 2000.

The installation is subject to 40 CFR Part 63 Subpart ZZZZ National Emissions Standards for Hazardous Air for Stationary Reciprocating Internal Combustion Engines. The permittee is an area source for HAP's and major source for NO_x.


Prepared by
Jacob Robinett
Operating Permit Unit


Director or Designee
Department of Natural Resources

MAY 14 2015

Effective Date

STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES



Jeremiah W. (Jay) Nixon, Governor • Sara Parker Pauley, Director

www.dnr.mo.gov

MAY 14 2015

Mr. Kerry Sampson
Trenton Municipal Utilities
PO Box 108
Trenton, MO 64683

Re: Trenton Municipal Utilities, 079-0027
Permit Number: OP2015-011

Dear Mr. Sampson:

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.

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:jr

Enclosures

c: Mr. Robert Cheever, US EPA Region VII
PAMS File: 2014-06-037

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I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION

Trenton Municipal Utilities operates two (2) electric generating substations within the city limits of Trenton, Missouri. The substations are identified as North and South Substations. The North Substation, located at 921 Industrial Drive, has five (5) diesel engine generators that have been in operation since 1974. The South Substation, located at 1st Street & Johnson Drive, has seven (7) diesel engine generators that began operation starting in 2000. The North and South Substation previously operated under a P70 operating permit No. OP2010-008, and operated under the plant ID 079-0027.

Trenton Municipal Utilities previous operated another generating substation called the Crowder Road plant. The plant was operated under the plant ID 079-0010. All of Trenton Municipal Unities generating substations have previous been included in one operating permit. Since being issued the last air operating permit (OP2010-008), the Crowder Road plant has been permanently disassembled. The diesel engine generators that were located at the facility have been permanently dismantled, and one diesel storage tank from the Crowder Road plant has been moved to the South Substation.

Reported Air Pollutant Emissions, tons per year					
Pollutants	2013	2012	2011	2010	2009
Particulate Matter ≤ Ten Microns (PM ₁₀)	0.02	0.04	0.04	0.06	0.12
Particulate Matter ≤ 2.5 Microns (PM _{2.5})	0.02	0.04	0.03	0.06	0.11
Sulfur Oxides (SO _x)	0.51	0.72	0.61	1.11	2.02
Nitrogen Oxides (NO _x)	1.63	2.28	1.92	3.49	6.35
Volatile Organic Compounds(VOC)	0.04	0.06	0.07	0.12	0.19
Carbon Monoxide (CO)	0.43	0.61	0.52	0.93	1.70

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 of Emission Unit
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North Substation (921 Industrial Drive)

EP3	2,750 kW EMD Diesel Engine PP1
EP4	2,750 kW EMD Diesel Engine PP2
EP5	2,750 kW EMD Diesel Engine PP3
EP6	2,750 kW EMD Diesel Engine PP4
EP7	2,750 kW EMD Diesel Engine PP5

South Substation (1st Street & Johnson Drive)

South EP2	1,825 kW Caterpillar Diesel Engine #1
South EP3	1,825 kW Caterpillar Diesel Engine #2
South EP4	1,825 kW Caterpillar Diesel Engine #3
South EP5	1,825 kW Caterpillar Diesel Engine #4
South EP8	1,825 kW Caterpillar Diesel Engine #5
South EP9	1,825 kW Caterpillar Diesel Engine #6
South EP10	1,825 kW Caterpillar Diesel Engine #7

EMISSION UNITS WITHOUT LIMITATIONS

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

Description of Emission Source

North Substation (921 Industrial Drive)

EP1	107,000 Gallon Fuel Oil Storage Tank
EP2	107,000 Gallon Fuel Oil Storage Tank
EP8	Five (5) 200 Gallon Each Fuel Oil Storage Tanks

South Substation (1st Street & Johnson Drive)

South EP1	5,000 Gallon Fuel Oil Storage Tank
South EP6	10,000 Gallon Fuel Oil Storage Tank
South EP7	Seven (7) 1,200 Gallon Each Fuel Oil Storage Tanks
South EP11	5,000 Gallon Fuel Oil Storage Tank

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.

None.

III. Emission Unit Specific Emission Limitations

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

PERMIT CONDITION 1			
10 CSR 10-6.060 Construction Permits Required Construction Permit No. 072000-006A issued January 27, 2006.			
South Substation			
Emission Unit	Description	Manufacturer/Model #	Installation Date
South EP2	Caterpillar diesel engine #1 1,825kW(16.86 MMBtu/hr)	Caterpillar/3516B, DM4501-01	08/01/2000
South EP3	Caterpillar diesel engine #2 1,825kW(16.86 MMBtu/hr)	Caterpillar/3516B, DM4501-01	08/01/2000
South EP4	Caterpillar diesel engine #3 1,825kW(16.86 MMBtu/hr)	Caterpillar/3516B, DM4501-01	08/01/2000
South EP5	Caterpillar diesel engine #4 1,825kW(16.86 MMBtu/hr)	Caterpillar/3516B, DM4501-01	08/01/2000
South EP8	Caterpillar diesel engine #5 1,825kW(16.86 MMBtu/hr)	Caterpillar/3516B, DM4501-01	04/01/2004
South EP9	Caterpillar diesel engine #6 1,825kW(16.86 MMBtu/hr)	Caterpillar/3516B, DM4501-01	04/01/2004
South EP10	Caterpillar diesel engine #7 1,825kW(16.86 MMBtu/hr)	Caterpillar/3516B, DM4501-01	04/01/2004

Emission Limitations

The permittee shall limit NO_x emissions to less than 106.44 tons per twelve (12) consecutive months for all seven diesel engine generators (South EP2, South EP3, South EP4, South EP5, South EP8, South EP9, and South EP10) combined. [Special Condition #1.A.]

Monitoring/Recordkeeping

The permittee shall maintain the monthly and the sum of the most recent consecutive 12-month records of the combined NO_x emissions for the seven (7) diesel engine generators. The permittee shall use Attachment B, or an equivalent form to demonstrate compliance with the special condition #1A. These records shall be maintained on-site with the units for five (5) years and shall be made available for inspection to the Department of Natural Resources' (DNR) personnel upon request. [Special Condition #1.B.]

Reporting

1. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after the end of the month when records indicate an exceedance of 106.44 tons of NO_x emissions any consecutive twelve (12) month period. [Special Condition #1.C.]

- The permittee shall report any deviations/exceedances of this permit condition using the semi-annual monitoring report and annual compliance certification to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by Section V of this permit.

PERMIT CONDITION 2			
10 CSR 10-6.060 Construction Permits Required			
Construction Permit No. 072000-006A issued January 27, 2006.			
North Substation			
Emission Unit	Description	Manufacturer/Model #	Installation Date
EP3	General Motors EMD Diesel Engine #PP1 2,750 kW (25.814 MMBtu/hr).	General Motors/Mp45	08/13/1974
EP4	General Motors EMD Diesel Engine #PP2 2,750 kW (25.814 MMBtu/hr).	General Motors/Mp45	08/13/1974
EP5	General Motors EMD Diesel Engine #PP3 2,750 kW (25.814 MMBtu/hr).	General Motors/Mp45	08/13/1974
EP6	General Motors EMD Diesel Engine #PP4 2,750 kW (25.814 MMBtu/hr).	General Motors/Mp45	08/13/1974
EP7	General Motors EMD Diesel Engine #PP5 2,750 kW (25.814 MMBtu/hr).	General Motors/Mp45	06/1/1975

Emission Limitations

The permittee shall emit less than ninety one (91) tons of NO_x from all five engines (EP3, EP4, EP5, EP6, and EP7) in any consecutive twelve (12) month period. [Special Condition #3.A.]

Monitoring/Recordkeeping

The permittee shall maintain the monthly and sum of the most recent consecutive 12-month records of the NO_x emissions from all five (5) diesel engine generators. The permittee shall use Attachment C, or an equivalent form to demonstrate compliance with Special Condition #3.A. These records shall be maintained on-site with the units for five (5) years and shall be made available for inspection to the Department of Natural Resources' (DNR) personnel upon request. [Special Condition #3.B.]

Reporting

- The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after the end of the month when records indicate an exceedance of ninety one (91) tons of NO_x emissions any consecutive twelve (12) month period. [Special Condition #3.C.]
- The permittee shall report any deviations/exceedances of this permit condition using the semi-annual monitoring report and annual compliance certification to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by Section V of this permit.

PERMIT CONDITION 3
10 CSR 10-6.075 Maximum Achievable control Technology Regulations and
40 CFR Part 63 Subpart A General Provisions and
40 CFR Part 63 Subpart ZZZZ National Emissions Standards for Hazardous Air Pollutants for
Stationary Reciprocating Internal Combustion Engines

South Substation			
Emission Unit	Description	Manufacturer/Model #	Installation Date
South EP2	Caterpillar diesel engine #1 1,825kW(16.86 MMBtu/hr) (2,593 Hp)	Caterpillar/3516B, DM4501-01	08/01/2000
South EP3	Caterpillar diesel engine #2 1,825kW(16.86 MMBtu/hr) (2,593 Hp)	Caterpillar/3516B, DM4501-01	08/01/2000
South EP4	Caterpillar diesel engine #3 1,825kW(16.86 MMBtu/hr) (2,593 Hp)	Caterpillar/3516B, DM4501-01	08/01/2000
South EP5	Caterpillar diesel engine #4 1,825kW(16.86 MMBtu/hr) (2,593 Hp)	Caterpillar/3516B, DM4501-01	08/01/2000
South EP8	Caterpillar diesel engine #5 1,825kW(16.86 MMBtu/hr) (2,593 Hp)	Caterpillar/3516B, DM4501-01	04/01/2004
South EP9	Caterpillar diesel engine #6 1,825kW(16.86 MMBtu/hr) (2,593 Hp)	Caterpillar/3516B, DM4501-01	04/01/2004
South EP10	Caterpillar diesel engine #7 1,825kW(16.86 MMBtu/hr) (2,593 Hp)	Caterpillar/3516B, DM4501-01	04/01/2004

North Substation			
Emission Unit	Description	Manufacturer/Model #	Installation Date
EP3	General Motors EMD Diesel Engine #PP1 2,750 kW (25.814 MMBtu/hr) (3,600 Hp)	General Motors/Mp45	08/13/1974
EP4	General Motors EMD Diesel Engine #PP2 2,750 kW (25.814 MMBtu/hr) (3,600 Hp)	General Motors/Mp45	08/13/1974
EP5	General Motors EMD Diesel Engine #PP3 2,750 kW (25.814 MMBtu/hr) (3,600 Hp)	General Motors/Mp45	08/13/1974
EP6	General Motors EMD Diesel Engine #PP4 2,750 kW (25.814 MMBtu/hr) (3,600 Hp)	General Motors/Mp45	08/13/1974
EP7	General Motors EMD Diesel Engine #PP5 2,750 kW (25.814 MMBtu/hr) (3,600 Hp)	General Motors/Mp45	06/1/1975

The emission units at the North Substation (EP3 - EP7) are complying with the emission limitation of reducing the Carbon Monoxide (CO) emissions by seventy percent (70%). The emission units at the South Substations (South EP2 - South EP10) are complying with the emission limitation of limiting the concentration of CO in the stationary RICE exhaust to 23 ppmvd at 15 percent O₂.

Emission Limitation

1. The permittee must comply with the requirements in Table 2d to this subpart and the operating limitations in Table 2b to this subpart. [§63.6603(a)]

2. The permittee must use diesel fuel that meets the requirements in 40 CFR 80.510(b) for nonroad diesel fuel. [§63.6604(a)]
3. At all times the permittee must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require the permittee to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. [§63.6605(b)]
4. The permittee must comply with either paragraph (4)(a) or paragraph (b) of this section. Owners and operators must follow the manufacturer's specified maintenance requirements for operating and maintaining the open or closed crankcase ventilation systems and replacing the crankcase filters, or can request the Administrator to approve different maintenance requirements that are as protective as manufacturer requirements.
 - a) Install a closed crankcase ventilation system that prevents crankcase emissions from being emitted to the atmosphere, or [§63.6625(g)(1)]
 - b) Install an open crankcase filtration emission control system that reduces emissions from the crankcase by filtering the exhaust stream to remove oil mist, particulates and metals. [§63.6625(g)(2)]
5. The permittee must minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the emission standards applicable to all times other than startup in Table 2d to this subpart apply. [§63.6625(h)]

Table 2b to Subpart ZZZZ of Part 63 - Operating Limitations for Existing CI Stationary RICE >500 HP

Compliance Method	Operational Limitations
Existing CI stationary RICE >500 HP complying with the requirement to limit or reduce the concentration of CO in the stationary RICE exhaust and using an oxidation catalyst	Maintain your catalyst so that the pressure drop across the catalyst does not change by more than 2 inches of water from the pressure drop across the catalyst that was measured during the initial performance test; and
	Maintain the temperature of your stationary RICE exhaust so that the catalyst inlet temperature is greater than or equal to 450 °F and less than or equal to 1350 °F. ¹

¹Sources can petition the Administrator pursuant to the requirements of 40 CFR 63.8(f) for a different temperature range.

Table 2d to Subpart ZZZZ of Part 63—Requirements for Existing Stationary RICE Located at Area Sources of HAP Emissions

RICE Type	Emission Limitation
Non-Emergency, non-black start CI stationary RICE >500 HP	Reduce CO emissions by 70 percent or more; or
	Limit concentration of CO in the stationary RICE exhaust to 23 ppmvd at 15 percent O ₂ .

Performance Testing

1. Compliance with the numerical emission limitations established in this subpart is based on the results of testing the average of three 1-hour runs using the testing requirements and procedures in §63.6620 and Table 4 to this subpart. [§63.6603]
2. The permittee must be in compliance with the emission limitations, operating limitations, and other requirements in this subpart that apply to you at all times. [§63.6605(a)]
3. The permittee must conduct any initial performance test or other initial compliance demonstration according to Tables 4 and 5 to this subpart that apply to you within 180 days after the compliance date that is specified for your stationary RICE in §63.6595 and according to the provisions in §63.7(a)(2). [§63.6612(a)]
4. The permittee must conduct subsequent performance tests as specified in Table 3 of this subpart. [§63.6615]
5. The permittee must conduct each performance test in Tables 3 and 4 of this subpart that applies to you. [§63.6620(a)]
6. Each performance test must be conducted according to the requirements that this subpart specifies in Table 4 to this subpart. [§63.6620(b)]
7. The permittee must conduct three separate test runs for each performance test required in this section, as specified in §63.7(e)(3). Each test run must last at least 1 hour, unless otherwise specified in this subpart. [§63.6620(d)]
8. The engine percent load during a performance test must be determined by documenting the calculations, assumptions, and measurement devices used to measure or estimate the percent load in a specific application. A written report of the average percent load determination must be included in the notification of compliance status. The following information must be included in the written report: the engine model number, the engine manufacturer, the year of purchase, the manufacturer's site-rated brake horsepower, the ambient temperature, pressure, and humidity during the performance test, and all assumptions that were made to estimate or calculate percent load during the performance test must be clearly explained. If measurement devices such as flow meters, kilowatt meters, beta analyzers, stain gauges, etc. are used, the model number of the measurement device, and an estimate of its accurate in percentage of true value must be provided. [§63.6620(i)]

Table 3 to Subpart ZZZZ of Part 63—Subsequent Performance Tests

Rice Type	Emission Limit	Subsequent Performance Testing Requirement
Existing non-emergency, non-black start CI stationary RICE >500 HP that are not limited use stationary RICE	Limit or reduce CO emissions and not using a CEMS	Conduct subsequent performance tests every 8,760 hours or 3 years, whichever comes first.

Table 4 to Subpart ZZZZ of Part 63—Requirements for Performance Tests

Emission Limit	Performance Test Requirement	Equipment/Method	Additional Requirements
Reduce CO emissions	Measure the O ₂ at the inlet and outlet of the control device; and	Portable CO and O ₂ analyzer	Using ASTM Method D6522-00 (2005) ^a (incorporated by reference, see §63.14). Measurements to determine O ₂ shall be made at the same time as the measurements for CO concentration
	Measure the CO at the inlet and the outlet of the control device		Using ASTM D6522-00 (2005) ^{ab} (incorporated by reference, see §63.14) or Method 10 of 40 CFR Appendix A. the CO concentration shall be at 15% O ₂ , dry basis
Limit the concentration of CO in the stationary RICE exhaust	Select the sampling port location and the number of traverse points	Method 1 or 1A of 40 CFR Part 60, Appendix A §63.7(d)(1)(i)	If using a control device, the sampling site shall be located at the outlet of the control device
	Determine the O ₂ concentration of the stationary RICE exhaust at the sampling port location; and	Method 3 or 3A or 3B of 40 CFR Part 60, Appendix A-2, or ASTM Method D6522-00 (Reapproved 2005) ^a (heated probe not necessary)	Measurements to determine O ₂ concentration must be made at the same time and location as the measurements for CO concentration.
	Measure moisture content of the stationary RICE exhaust at the sampling port location; and	Method 4 of 40 CFR Part 60, Appendix A-3, or Method 320 of 40 CFR Part 63, Appendix A, or ASTM D 6348-03 ^a	Measurements to determine moisture content must be made at the same time and location as the measurements for CO concentration.
	Measure CO at the exhaust of the stationary RICE	Method 10 of 40 CFR Part 60, Appendix A-4, ASTM Method D6522-00 (2005) ^{ac} , Method 320 of 40 CFR Part 63, Appendix A, or ASTM D6348-03 ^a	CO concentration must be at 15 percent O ₂ , dry basis. Results of this test consist of the average of the three 1-hour or longer runs.

^aYou may also use Methods 3A and 10 as options to ASTM-D6522-00 (2005). You may obtain a copy of ASTM-D6522-00 (2005) from at least one of the following addresses: American Society for Testing and Materials, 100 Barr Harbor Drive, West Conshohocken, PA 19428-2959, or University Microfilms International, 300 North Zeeb Road, Ann Arbor, MI 48106.

^bYou may obtain a copy of ASTM-D6348-03 from at least one of the following addresses: American Society for Testing and Materials, 100 Barr Harbor Drive, West Conshohocken, PA 19428-2959, or University Microfilms International, 300 North Zeeb Road, Ann Arbor, MI 48106.

Monitoring:

1. The permittee must install, operate, and maintain each CPMS according to the following requirements. [§63.6625(b)]
 - 1) The permittee must prepare a site-specific monitoring plan that addresses the monitoring system design, data collection, and the quality assurance and quality control elements outlined in §63.6625(b)(1)(a)(i)-(v) and in §63.8(d). The permittee may request approval of monitoring system quality assurance and quality control procedures alternative to those specified in §63.6625(1)(a)-(e) in the site-specific monitoring plan. [§63.6625(b)(1)]
 - i) The performance criteria and design specifications for the monitoring system equipment, including the sample interface, detector signal analyzer, and data acquisition and calculations; [§63.6625(b)(1)(i)]

- ii) Sampling interface (e.g., thermocouple) location such that the monitoring system will provide representative measurements; [§63.6625(b)(1)(ii)]
- iii) Equipment performance evaluations, system accuracy audits, or other audit procedures; [§63.6625(b)(1)(iii)]
- iv) ongoing operation and maintenance procedures in accordance with provisions in §63.8(c)(1)(ii) and (e)(2)(i). [§63.6625(b)(1)(iv)]
- v) Ongoing reporting and recordkeeping procedures in accordance with provisions in §63.10(c),(e)(1), and (e)(2)(i). [§63.6625(b)(1)(v)]
- 2) The permittee must install, operate, and maintain each CPMS in continuous operation according to the procedures in your site specific monitoring plan. [§63.6625(b)(2)]
- 3) The CPMS must collect data at least once every 15 minutes. [§63.6625(b)(3)]
- 4) The temperature sensor must have a minimum tolerance of 2.8 degrees Celsius (5 degrees Fahrenheit) or 1 percent of the measurement range, whichever is larger. [§63.6625(b)(4)]
- 5) The permittee must conduct the CPMS equipment performance evaluation, system accuracy audits, or other audit procedures specified in the site-specific monitoring plan at least annually. [§63.6625(b)(5)]
- 6) The permittee must conduct a performance evaluation of each CPMs in accordance with the site-specific monitoring plan. [§63.6625(b)(6)]
2. The permittee must monitor and collect data to demonstrate continuous compliance.
 - a) The permittee must monitor and collect data. [§63.6635(a)]
 - b) Except for monitor malfunctions, associated repairs, required performance evaluations, and required quality assurance or control activities, the permittee must monitor continuously at all times that the stationary RICE is operating. A monitoring malfunction is any sudden infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions. [§63.6635(b)]
 - c) The permittee may not use data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities in data averages and calculations used to report emission or operating levels. The permittee must, however, use all valid data collected during all other periods. [§63.6635(c)]

Continuous Compliance

The permittee must demonstrate continuous compliance with the emission limitations, operating limitations, and other requirements.

1. The permittee must demonstrate continuous compliance with each emission limitation, operating limitation and other requirements in Tables 2b and Table 2d to this subpart that apply to you according to methods specified in Table 6. [§63.6640 (a)]
2. The permittee must report each instance in which you did not meet each emission limitation or operating limitation in Table 2b and Table 2d that applies. These instances are deviations from the emission and operating limitations in this subpart. These deviations must be reported according to the requirements in §63.6650. If the permittee changes the catalyst, the permittee must reestablish the values of the operating parameters measured during the initial performance test. When the permittee reestablishes the values of your operating parameters, the permittee must also conduct a performance test to demonstrate that the required emission limitation applicable to the permittee's stationary RICE are being met. [§63.6640(b)]
3. The permittee must also report each instance in which the permittee did not meet the requirements in the general provisions of the permit. [§63.6640 (e)]

Table 6 to Subpart ZZZZ of Part 63—Continuous Compliance With Emission Limitations, and Other Requirements

Compliance Method	The permittee must demonstrate continuous compliance by . . .
Reduce CO emissions, or limit the concentration of CO in the stationary RICE exhaust, and not using oxidation catalyst	Conducting performance tests every 8,760 hours or 3 years, whichever comes first, for CO to demonstrate that the required CO percent reduction is achieved or that your emissions remain at or below the CO concentration limit; and
	Collecting the approved operating parameter (if any) data according to §63.6625(b); and
	Reducing these data to 4-hour rolling averages; and
	Maintaining the 4-hour rolling averages within the operating limitations for the operating parameters established during the performance test.

Notifications:

1. The permittee must meet all of the notifications in §§63.7(b) and (c), 63.8(e), (f)(4) and (f)(6), 63.9(b) through (e), and (g) and (h) that apply by the dates specified. [§63.6645(a)]
2. The permittee must submit a Notification of Intent if required to conduct a performance test at least 60 days before the performance test is scheduled to begin. [§63.6645 (g)]
3. If you are required to conduct a performance test or other initial compliance demonstration as specified in Tables 4 and 5 to this subpart, you must submit a Notification of Compliance Status according to §63.9(h)(2)(ii). [§63.6645(h)]
 - a) For each initial compliance demonstration required in Table 5 to this subpart that does not include a performance test, you must submit the Notification of Compliance Status before the close of business on the 30th day following the completion of the initial compliance demonstration. [§63.6645(h)(1)]
 - b) For each initial compliance demonstration required in Table 5 to this subpart that includes a performance test conducted according to the requirements in Table 3 to this subpart, you must submit the Notification of Compliance Status, including the performance test results, before the close of business on the 60th day following the completion of the performance test according to §63.10(d)(2). [§63.6645(h)(2)]

Recordkeeping

1. The permittee must comply with the emission and operating limitations, the permittee must keep the records described in paragraphs (a)(1) through (a)(5), (b)(1) through (b)(3) and (c) of this section. [§63.6655(a)]
 - a) A copy of each notification and report that the permittee submitted to comply with this subpart, including all documentation supporting any Initial Notification or Notification of Compliance Status that you 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 performance tests and performance evaluations as required in §63.10(b)(2)(viii). [§63.6655(a)(3)]
 - d) Records of all required maintenance performed on the air pollution control and monitoring equipment. [§63.6655(a)(4)]
 - e) 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. For each CEMS or CPMS, the permittee must keep the records listed in paragraphs (b)(1) through (3) of this section. [§63.6655(b)]
 - a) Records described in §63.10(b)(2)(vi) through (xi). [§63.6655(b)(1)]
 - b) Previous (*i.e.*, superseded) versions of the performance evaluation plan as required in §63.8(d)(3). [§63.6655(b)(2)]
 - c) Requests for alternatives to the relative accuracy test for CEMS or CPMS as required in §63.8(f)(6)(i), if applicable. [§63.6655(b)(3)]
3. The permittee must keep the records required in Table 6 of this subpart to show continuous compliance with each emission or operating limitation that applies to you. [§63.6655(d)]
4. The permittee must keep records of the maintenance conducted on the stationary RICE in order to demonstrate that the permittee operated and maintained the stationary RICE and after-treatment control device (if any) according to your own maintenance plan if you own or operate any of the following stationary RICE; [§63.6655(e)]
 - a) An existing stationary RICE with a site rating of less than 100 brake HP located at a major source of HAP emissions. [§63.6655(e)(1)]
 - b) An existing stationary emergency RICE. [§63.6655(e)(2)]
 - c) An existing stationary RICE located at an area source of HAP emissions subject to management practices as shown in Table 2d to this subpart. [§63.6655(e)(3)]
5. The permittee's records must be in a form suitable and readily available for expeditious review according to §63.10(b)(1). [§63.6660(a)]
6. As specified in §63.10(b)(1), the permittee must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. [§63.6660(b)]
7. The permittee must keep each record readily accessible in hard copy or electronic form for at least 5 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to §63.10(b)(1). [§63.6660(c)]

Reporting

1. The permittee must submit each report in Table 7 of this subpart that applies. [§63.6650(a)]
2. Unless the Administrator has approved a different schedule for submission of reports under §63.10(a), the permittee must submit each report by the date in Table 7 of this subpart and according to the requirements: [§63.6650(b)]
 - a) For semi-annual Compliance reports, the first Compliance report must cover the period beginning May 1, 2014 and ending on June 30. [§63.6650(b)(1)]
 - b) For semi-annual Compliance reports, the first Compliance report must be postmarked or delivered no later than July 31. [§63.6650(b)(2)]
 - c) For semi-annual Compliance reports, each subsequent Compliance report must cover the semi-annual reporting period from January 1 through June 30 or the semi-annual reporting period from July 1 through December 31. [§63.6650(b)(3)]
 - d) For semi-annual Compliance reports, each subsequent Compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semi-annual reporting period. [§63.6650(b)(4)]
 - e) For each stationary RICE that is subject to permitting regulations pursuant to 40 CFR Part 70 or 71, and if the permitting authority has established dates for submitting semi-annual reports pursuant to 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6 (a)(3)(iii)(A), you may submit the first and subsequent Compliance reports according to the dates the permitting authority has established instead of according to the dates in paragraphs (b)(1) through (b)(4) of this section. [§63.6650(b)(5)]

3. The Compliance report must contain the information in paragraphs (c)(1) through (6) of this section. [§63.6650(c)]
 - a) Company name and address. [§63.6650(c)(1)]
 - b) Statement by a responsible official, with that official's name, title, and signature, certifying the accuracy of the content of the report. [§63.6650(c)(2)]
 - c) Date of report and beginning and ending dates of the reporting period. [§63.6650(c)(3)]
 - d) If you had a malfunction during the reporting period, the compliance report must include the number, duration, and a brief description for each type of malfunction which occurred during the reporting period and which caused or may have caused any applicable emission limitation to be exceeded. The report must also include a description of actions taken by an owner or operator during a malfunction of an affected source to minimize emissions in accordance with §63.6605(b), including actions taken to correct a malfunction. [§63.6650(c)(4)]
 - e) If there are no deviations from any emission or operating limitations that apply to you, a statement that there were no deviations from the emission or operating limitations during the reporting period. [§63.6650(c)(5)]
 - f) If there were no periods during which the continuous monitoring system (CMS), including CEMS and CPMS, was out-of-control, as specified in §63.8(c)(7), a statement that there were no periods during which the CMS was out-of-control during the reporting period. [§63.6650(c)(6)]
4. For each deviation from an emission or operating limitation that occurs for a stationary RICE where you are not using a CMS to comply with the emission or operating limitations in this subpart, the Compliance report must contain the information in paragraphs (c)(1) through (4) of this section and the information in paragraphs (d)(1) and (2) of this section. [§63.6650(d)]
 - a) The total operating time of the stationary RICE at which the deviation occurred during the reporting period. [§63.6650(d)(1)]
 - b) Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken. [§63.6650(d)(2)]
5. For each deviation from an emission or operating limitation occurring for a stationary RICE where you are using a CMS to comply with the emission and operating limitations in this subpart, you must include information in paragraphs (c)(1) through (4) and (e)(1) through (12) of this section. [§63.6650(e)]
 - a) The date and time that each malfunction started and stopped. [§63.6650(e)(1)]
 - b) The date, time, and duration that each CMS was inoperative, except for zero (low-level) and high-level checks. [§63.6650(e)(2)]
 - c) The date, time, and duration that each CMS was out-of-control, including the information in §63.8(c)(8). [§63.6650(e)(3)]
 - d) The date and time that each deviation started and stopped, and whether each deviation occurred during a period of malfunction or during another period. [§63.6650(e)(4)]
 - e) A summary of the total duration of the deviation during the reporting period, and the total duration as a percent of the total source operating time during that reporting period. [§63.6650(e)(5)]
 - f) A breakdown of the total duration of the deviations during the reporting period into those that are due to control equipment problems, process problems, other known causes, and other unknown causes. [§63.6650(e)(6)]
 - g) A summary of the total duration of CMS downtime during the reporting period, and the total duration of CMS downtime as a percent of the total operating time of the stationary RICE at which the CMS downtime occurred during that reporting period. [§63.6650(e)(7)]

- h) An identification of each parameter and pollutant (CO or formaldehyde) that was monitored at the stationary RICE. [§63.6650(e)(8)]
 - i) A brief description of the stationary RICE. [§63.6650(e)(9)]
 - j) A brief description of the CMS. [§63.6650(e)(10)]
 - k) The date of the latest CMS certification or audit. [§63.6650(e)(11)]
 - l) A description of any changes in CMS, processes, or controls since the last reporting period. [§63.6650(e)(12)]
6. Each affected source that has obtained a title V operating permit pursuant to 40 CFR Part 70 or 71 must report all deviations as defined in this subpart in the semi-annual monitoring report required by 40 CFR 70.6 (a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A). If an affected source submits a Compliance report pursuant to Table 7 of this subpart along with, or as part of, the semi-annual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), and the Compliance report includes all required information concerning deviations from any emission or operating limitation in this subpart, submission of the Compliance report shall be deemed to satisfy any obligation to report the same deviations in the semi-annual monitoring report. However, submission of a Compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permit authority. [§63.6650(f)]
7. The permittee shall report to the Missouri Air Compliance Coordinator; EPA Region 7, 11201 Renner Boulevard, Lenexa, KS 66219, no later than ten (10) days after any exceedance of any of the terms imposed by this regulation or any malfunction which could possibly cause an exceedance of this regulation.
8. The permittee shall report any deviations/exceedances of this permit condition using the semi-annual monitoring report and annual compliance certification to the Missouri Air Compliance Coordinator; EPA Region 7, 11201 Renner Boulevard, Lenexa, KS 66219, as required by Section V of this permit.

Table 7 to Subpart ZZZZ of Part 63—Requirements for Reports

The Compliance Report shall contain...	The report must be submitted...
If there are no deviations from any emission limitations or operating limitations that apply to you, a statement that there were no deviations from the emission limitations or operating limitations during the reporting period. If there were no periods during which the CMS, including CEMS and CPMS, was out-of-control, as specified in §63.8(c)(7), a statement that there were not periods during which the CMS was out-of-control during the reporting period; or	Semi-annually according to the requirements in §63.6650(b).
If a deviation from any emission limitation or operating limitation during the reporting period, the information in §63.6650(d). If there were periods during which the CMS, including CEMS and CPMS, was out-of-control, as specified in §63.8(c)(7), the information in §63.6650(e); or	
If you had a malfunction during the reporting period, the information in §63.6650(c)(4).	

PERMIT CONDITION 4
10 CSR 10-6.260 Restriction of Emission of Sulfur Compounds

North Substation			
Emission Unit	Description	Manufacturer/Model #	Installation Date
EP3	General Motors EMD Diesel Engine #PP1 2,750 kW (25.814 MMBtu/hr).	General Motors/Mp45	08/13/1974
EP4	General Motors EMD Diesel Engine #PP2 2,750 kW (25.814 MMBtu/hr).	General Motors/Mp45	08/13/1974
EP5	General Motors EMD Diesel Engine #PP3 2,750 kW (25.814 MMBtu/hr).	General Motors/Mp45	08/13/1974
EP6	General Motors EMD Diesel Engine #PP4 2,750 kW (25.814 MMBtu/hr).	General Motors/Mp45	08/13/1974
EP7	General Motors EMD Diesel Engine #PP5 2,750 kW (25.814 MMBtu/hr).	General Motors/Mp45	06/1/1975

South Substation			
Emission Unit	Description	Manufacturer/Model #	Installation Date
South EP2	Caterpillar diesel engine #1 1,825kW(16.86 MMBtu/hr)	Caterpillar/3516B, DM4501-01	08/01/2000
South EP3	Caterpillar diesel engine #2 1,825kW(16.86 MMBtu/hr)	Caterpillar/3516B, DM4501-01	08/01/2000
South EP4	Caterpillar diesel engine #3 1,825kW(16.86 MMBtu/hr)	Caterpillar/3516B, DM4501-01	08/01/2000
South EP5	Caterpillar diesel engine #4 1,825kW(16.86 MMBtu/hr)	Caterpillar/3516B, DM4501-01	08/01/2000
South EP8	Caterpillar diesel engine #5 1,825kW(16.86 MMBtu/hr)	Caterpillar/3516B, DM4501-01	04/01/2004
South EP9	Caterpillar diesel engine #6 1,825kW(16.86 MMBtu/hr)	Caterpillar/3516B, DM4501-01	04/01/2004
South EP10	Caterpillar diesel engine #7 1,825kW(16.86 MMBtu/hr)	Caterpillar/3516B, DM4501-01	04/01/2004

Emission Limitation:

The permittee shall not cause or allow the emission into the atmosphere gases containing 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/cubic meter) of sulfuric acid or sulfur trioxide or any combination of those gases averaged on any consecutive three (3)-hour time period. [10 CSR 10-6.260 (3)(A)(2)]

Monitoring/Recordkeeping:

1. See Permit Condition 3, Emission Limitation requirement #2; for fuel specifications.
2. The permittee shall maintain records of the fuel type used. Purchase receipts, analyzed samples or certifications that verify the fuel type will be acceptable.

Reporting:

1. The permittee shall report to the Air Pollution control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after any exceedance of any of the terms imposed by this regulation or any malfunction which could possibly cause an exceedance of this regulation.
2. The permittee shall report any deviations/exceedances of this permit condition using the semi-annual monitoring report and annual compliance certification to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by Section V of this permit.

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 is only an excerpt from the regulation or code, and is 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. Refer to the regulation for a complete list of allowances. The following is an exception to the allowances:
 - a) Yard waste.
3. 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.
4. Trenton Municipal Utilities may be issued an annually renewable open burning permit for open burning provided that an air curtain destructor or incinerator is utilized and only tree trunks, tree limbs, vegetation or untreated wood waste are burned. Open burning shall occur at least two hundred (200) yards from the nearest occupied structure unless the owner or operator of the occupied structure provides a written waiver of this requirement. Any waiver shall accompany the open burning permit application. The permit may be revoked if Trenton Municipal Utilities fails to comply with the provisions or any condition of the open burning permit.
 - a) In a nonattainment area, as defined in 10 CSR 10-6.020, paragraph (2)(N)5., the director shall not issue a permit under this section unless the owner or operator can demonstrate to the satisfaction of the director that the emissions from the open burning of the specified material would be less than the emissions from any other waste management or disposal method.
5. Reporting and Record Keeping. New Source Performance Standard (NSPS) 40 CFR Part 60 Subpart CCCC establishes certain requirements for air curtain destructors or incinerators that burn wood trade waste. These requirements are established in 40 CFR 60.2245-60.2260. The provisions of 40 CFR part 60 Subpart CCCC promulgated as of September 22, 2005 shall apply and are hereby incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401. To comply with NSPS 40 CFR 60.2245-60.2260, sources must conduct an annual Method 9 test. A copy of the annual Method 9 test results shall be submitted to the director.
6. Test Methods. The visible emissions from air pollution sources shall be evaluated as specified by 40 CFR part 60, Appendix A–Test Methods, Method 9–Visual Determination of the Opacity of Emissions from Stationary Sources. The provisions of 40 CFR part 60, Appendix A, Method 9 promulgated as of December 23, 1971 is incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401.

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) Best 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 list to the director in writing at least ten days prior to any maintenance, start-up or shutdown, 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, it shall be given as soon as practicable prior to the release. If an unplanned excess release of emissions exceeding one hour occurs during maintenance, start-up or shutdown, the director shall be notified verbally as soon as practical during normal working hours and no later than the close of business of the following working day. A written notice shall follow within ten working days.
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. [10 CSR 10-6.065(6)(B)1.A(V)] The permittee shall retain the most current operating permit issued to this installation on-site. [10 CSR 10-6.065(6)(C)1.C(II)] The permittee shall immediately make such permit available to any Missouri Department of Natural Resources personnel upon request. [10 CSR 10-6.065(6)(C)3.B]

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

1. 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.
2. The permittee shall conduct monitoring to demonstrate compliance with registration, certification, notification, and Abatement Procedures and Practices standards as specified in 40 CFR Part 61, Subpart M.

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

1. The permittee shall submit 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. The permittee may be required by the director to file additional reports.
3. 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.
4. 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.
5. The fees shall be payable to the Department of Natural Resources and shall be accompanied by the emissions report.
6. The permittee shall complete required reports on state supplied EIQ forms or electronically via MoEIS. Alternate methods of reporting the emissions can be submitted for approval by the director. The reports shall be submitted to the director by April 1 after the end of each reporting year. If the full emissions report is filed electronically via MoEIS, this due date is extended to May 1.
7. The reporting period shall end on December 31 of each calendar year. Each report shall contain the required information for each emission unit for the twelve (12)-month period immediately preceding the end of the reporting period.
8. The permittee shall collect, record and maintain the information necessary to complete the required forms during each year of operation of the installation.

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 10-6.170

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. Renewal of Operating Permit does not restart weekly observation schedule.
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 A, 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 the visible emissions were normal for the installation.
3. Whether equipment malfunctions contributed to an exceedance.
4. 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 10-6.165 Restriction of Emission of Odors

This requirement is not federally enforceable.

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.

Title VI – 40 CFR Part 82 Protection of Stratospheric Ozone

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 §82.106.
 - b) The placement of the required warning statement must comply with the requirements pursuant to §82.108.
 - c) The form of the label bearing the required warning statement must comply with the requirements pursuant to §82.110.
 - d) No person may modify, remove, or interfere with the required warning statement except as described in §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:
 - a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
 - b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.

- c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
 - d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record keeping requirements pursuant to §82.166. ("MVAC-like" appliance as defined at §82.152).
 - e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to §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 §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 as specified 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*

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 by a permittee:
 - 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.

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

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.

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, 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.
 - iii) Exception. Monitoring requirements which require reporting more frequently than semi 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, this includes deviations or Part 64 exceedances.
 - d) Submit supplemental reports as required or as needed. Supplemental reports are required no later than ten days after any exceedance of any applicable rule, regulation or other restriction. 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, 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(6)(C)1.D Risk Management Plan Under Section 112(r)

The permittee shall comply with the requirements of 40 CFR Part 68, Accidental Release Prevention Requirements. If the permittee has more than a threshold quantity of a regulated substance in process, as determined by 40 CFR Section 68.115, the permittee shall submit a Risk Management Plan in accordance with 40 CFR Part 68 no later than the latest of the following dates:

1. June 21, 1999;
2. Three years after the date on which a regulated substance is first listed under 40 CFR Section 68.130; or
3. The date on which a regulated substance is first present above a threshold quantity in a process.

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, 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, 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, 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 application, 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 written notice of the change to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, no later than the next annual emissions report. This notice shall not be required for changes that are insignificant activities under 10 CSR 10-6.065(6)(B)3. 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)39 Responsible Official

The application utilized in the preparation of this permit was signed by Kerry Sampson, City Administrator. 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 may be reopened for cause if:

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

10 CSR 10-6.065(6)(E)1.C Statement of Basis

This permit is accompanied by a statement setting forth the legal and factual basis for the permit conditions (including references to applicable statutory or regulatory provisions). This Statement of Basis, while referenced by the permit, is not an actual part of the permit.

VI. Attachments

Attachments follow.

STATEMENT OF BASIS

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 June 11, 2014;
- 2) 2013 Emissions Inventory Questionnaire, received May 8, 2014;
- 3) WebFIRE;
- 4) No permit required determination project number 2000-03-033;
- 5) Construction Permit No. 072000-006;
- 6) Construction Permit No. 072000-006A; and
- 7) 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.

None.

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.

See Other Regulatory Determinations

Emission Point Revisions

EP8 is currently listed in OP2010-008 and the operating permit application as five (5) 250 gallons each fuel oil storage tanks. After talking to the permittee, the fuel oil storage tanks are 200 gallons each.

Construction Permit History

The following is a brief history of construction permits issued for this installation:

No Permit Required Determination 2000-03-033

Replace two (2) existing 1,000 gallon tanks with one (1) 10,000 gallon tank. No permit is required because the potential emissions are less than the permitting thresholds. This tank appears in this permit as South EP6.

Construction Permit 072000-006

This permit was issued on July 3, 2000 to authorize the construction of eight (8) diesel engine generators to the existing south substation and two (2) fuel storage tanks estimated at 20,000 gallons each. This permit has been replaced by Construction permit 072000-006A.

Construction Permit 072000-006A

This permit was issued on January 27, 2006 to amend construction permit 072000-006 to reflect the installation of seven (7) engines, instead of the eight (8) originally permitted and to incorporate corrections to the modeling parameters used in the original permit. This permit contains conditions for the equipment located at the Johnson Drive, Crowder Road, and Industrial Drive Plants. In a letter received June 9, 2014, the permittee has made changes to the Crowder Road site. Since the last air operating permit was issued (OP2010-008), the Crowder Road plant diesel engine generators have been permanently taken out of service. One diesel storage tank from the Crowder Road plant site has been moved to the South Substation site and has been given the Emission Unit No. South EP11. In the operating permit application for this project, applicant indicated that Johnson Drive Plant has been renamed South Substation, and the Industrial Drive Plant has been renamed North Substation.

This construction permit contains a stack testing requirement for the equipment at the south substation. On June 16, 2009, the Missouri Department of Natural Resources' Air Pollution Control Program issued Notice of Violation #59RS1 and settlement offer for failure to conduct a stack test within 180 days as required by special condition #4 of construction permit #072000-006A. On June 22, 2009, the Air Pollution Control Program received a letter from the permittee that showed supporting documentation that the facility was dismissed from the requirement of conducting the stack test indicated above. On June 30, 2009, the Air Pollution Control Program sent a letter of notification to the permittee that the Air Pollution Control Program had elected to rescind the Notice of Violation #59RS1 and settlement offer. The installation has been deemed in compliance with this one-time stack testing requirement, therefore it is not included in this Operating Permit.

Special Condition #5 contains a fuel oil sulfur content requirement that was not included in this operating permit because the engines are subject to MACT ZZZZ, which requires a fuel oil sulfur content of 15 ppm. This limit is more stringent than the 700 ppm specified in Special Condition #5. Compliance with the limit in MACT ZZZZ demonstrates compliance with the sulfur limitation in the construction permit.

New Source Performance Standards (NSPS) Applicability

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

The regulation applies to owners and operators of stationary compression ignition (CI) internal combustion engines (ICE) that commenced construction after July 11, 2005.

On July 3, 2000, the Missouri Department of Natural Resources' Air Pollution Control Program issued a permit to construct eight diesel engine generators to the existing south substation. Based on the 2013 Emissions Inventory Questionnaire, the most recent engines were put in to service in April 2004, details of the installation dates for each generator can be found in the charts below. Since all engines were installed prior to the applicability date of this regulation, therefore this regulation does not apply.

North Substation			
Emission Unit	Description	Manufacturer/Model #	Installation Date
EP3	General Motors EMD Diesel Engine #PP1 2,750 kW (25.814 MMBtu/hr).	General Motors/Mp45	08/13/1974
EP4	General Motors EMD Diesel Engine #PP2 2,750 kW (25.814 MMBtu/hr).	General Motors/Mp45	08/13/1974
EP5	General Motors EMD Diesel Engine #PP3 2,750 kW (25.814 MMBtu/hr).	General Motors/Mp45	08/13/1974
EP6	General Motors EMD Diesel Engine #PP4 2,750 kW (25.814 MMBtu/hr).	General Motors/Mp45	08/13/1974
EP7	General Motors EMD Diesel Engine #PP5 2,750 kW (25.814 MMBtu/hr).	General Motors/Mp45	08/13/1974

South Substation			
Emission Unit	Description	Manufacturer/Model #	Installation Date
South EP2	Caterpillar diesel engine #1 1,825kW(16.86 MMBtu/hr)	Caterpillar/3516B, DM4501-01	08/01/2000
South EP3	Caterpillar diesel engine #2 1,825kW(16.86 MMBtu/hr)	Caterpillar/3516B, DM4501-01	08/01/2000
South EP4	Caterpillar diesel engine #3 1,825kW(16.86 MMBtu/hr)	Caterpillar/3516B, DM4501-01	08/01/2000
South EP5	Caterpillar diesel engine #4 1,825kW(16.86 MMBtu/hr)	Caterpillar/3516B, DM4501-01	08/01/2000
South EP8	Caterpillar diesel engine #5 1,825kW(16.86 MMBtu/hr)	Caterpillar/3516B, DM4501-01	04/01/2004
South EP9	Caterpillar diesel engine #6 1,825kW(16.86 MMBtu/hr)	Caterpillar/3516B, DM4501-01	04/01/2004
South EP10	Caterpillar diesel engine #7 1,825kW(16.86 MMBtu/hr)	Caterpillar/3516B, DM4501-01	04/01/2004

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

The regulation applies to owners and operators of stationary spark ignition (SI) internal combustion engines (ICE) that commenced construction after June 12, 2006. This rule does not apply to diesel compression ignition engines.

40 CFR Part 60 Subpart K – Standards of Performance for Storage Vessels for Petroleum Liquids

The regulation applies to facilities that have vessels with a capacity of 40,000 gallons or greater. This regulation does not apply based on the definitions on Petroleum liquids stated in §60.111(b).

40 CFR Part 60 Subpart Ka – Standards of Performance for Storage Vessels for Petroleum Liquids

The regulation applies to facilities that have storage vessels with a capacity greater than 40,000 gallons that is used to store petroleum liquids that commenced construction after May 18, 1978. This regulation does not apply based on the definitions on Petroleum liquids stated in §60.111a(b).

40 CFR Part 60 Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels

The regulation applies to facilities that have storage vessels with a capacity greater than or equal to 75 cubic meters that is used to store volatile organic liquids (VOL) that construction, reconstruction, or modification commenced after July 23, 1984. This regulation does not apply based on the vapor pressure of diesel is less than the threshold defined in §60.111b(b).

Maximum Achievable Control Technology (MACT) Applicability

40 CFR Part 63 Subpart ZZZZ – National Emissions Standards for Hazardous Air for Stationary Reciprocating Internal Combustion Engines

The regulation establishes a national emissions limitation and operating limitation for hazardous air pollutants (HAP) emitted from Stationary reciprocating internal combustion engines (RICE) located at major and area sources of HAP emissions.

The facility is subject to this subpart based on §63.6585(a), and is subject to the provisions for existing engines located at area sources of HAP emissions. Since the facility is an area source, EPA Region 7 is the compliance and enforcement authority since Missouri DNR has not accepted delegation of area sources subject to this regulation.

The compliance date for this rule was May 3, 2013, however on January 3, 2013 the facility requested a one year compliance extension with a form letter. EPA Region 7 granted the one year extension on April 17, 2013 with an expiration date of May 1, 2014. Installation of the control equipment began in October of 2013, however the facility missed the deadline to install controls on March 31, 2014 and completed the installation of the control devices on June 8, of 2014.

The initial compliance test was performed August 11, 2014 through August 15, 2014. The reports of the test results were submitted to EPA Region 7 on August 21, 2014. The APCP received notification from EPA Region 7 on Monday, February 9, 2015, that Trenton Municipal Utilities successfully installed the necessary control devices and completed the initial performance testing requirements.

The table below represents the data taken at the North Substation during the initial performance test to determine compliance. The engines were tested to comply with the standard to reduce Carbon Monoxide (CO) emissions by 70% or more. The catalyst pressure drop during the test has also been included to ensure continuous compliance. From §63.6603(a) of the rule, an operational limitation is that the facility must maintain the catalyst so that the pressure drop across the catalyst does not change by more than 2 inches of water from the pressure drop across the catalyst that was measured during the initial performance test.

	EP3	EP4	EP5	EP6	EP7
Performance Test Emission Limit results (% CO reduction)	73.6%	70.9%	72.1%	73.1%	72.6%
Catalyst Pressure Drop During Test (inch H ₂ O)	0.26	0.15	0.37	0.28	0.09

The table below represents the data taken at the South Substation during the initial performance test to determine compliance. The engines were tested to comply with the standard to limit the concentration of CO in the stationary RICE exhaust to 23 ppmvd at 15 percent O₂. The catalyst pressure drop during the test has also been included to help with continuous compliance. From §63.6603(a) of the rule, an operational limitation is that the facility must maintain the catalyst so that the pressure drop across the catalyst does not change by more than 2 inches of water from the pressure drop across the catalyst that was measured during the initial performance test.

	South EP2	South EP3	South EP4	South EP5	South EP8	South EP9	South EP10
Performance Test Emission Limit results (ppm)	11.3	8.7	10.1	9.8	8.1	8.3	9.4
Catalyst Pressure Drop During Test (inch H ₂ O)	0.22	0.26	0.01	0.21	0.29	0.66	0.08

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

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

40 CFR Part 61, Subpart M – *National Emission Standards for Asbestos* is applicable to the installation and has been applied within this permit (see Section IV. Core Permit Requirements).

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.

Greenhouse Gas Emissions

Note that this source may be subject to the Greenhouse Gas Reporting Rule. However, the preamble of the GHG Reporting Rule clarifies that Part 98 requirements do not have to be incorporated in Part 70 permits operating permits at this time. In addition, Missouri regulations do not require the installation to report CO₂ emissions in their Missouri Emissions Inventory Questionnaire; therefore, the installation's CO₂ emissions were not included within this permit. If required to report, the applicant reports the data directly to EPA. The public may obtain CO₂ emissions data for this installation by visiting <http://epa.gov/ghgreporting/ghgdata/reportingdatasets.html>.

Updated Potential to Emit for the Installation

Pollutant	Potential to Emit (tons/yr) ¹
CO	15.80
HAP	0.11
NO _x	197.44
PM ₁₀	3.56
PM ₂₅	3.43
SO _x	0.10
VOC	5.22

¹Each emission unit was evaluated at 8,760 hours of uncontrolled annual operation unless otherwise noted.

The potential emissions of the storage vessels are not accounted for in the table above. Potential emissions of the engines were based on the federally enforceable limitations established in the issued construction permits.

Other Regulatory Determinations

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

This regulation applies to sources of visible emissions throughout the state of Missouri. The units are internal combustion engines and are not subject to this regulation per 6.220(1)(A).

10 CSR 10-6.260 Restriction of Emission of Sulfur Compounds

This regulation applies to installations that are an emission source of sulfur compounds. The installation is subject to this regulation. Compliance with the provisions by the fuel sulfur requirements of MACT ZZZZ §63.6604(a) will assure compliance with the limits of this rule. MACT ZZZZ §63.6604(a) allows for a maximum sulfur fuel content of 15 ppm, while 10 CSR 10-6.260 allows for a maximum emission of 500 ppmv.

10 CSR 10-6.390 Control of NO_x Emissions from Large Stationary Internal Combustion Engines

This regulation applies to large stationary internal combustion engine larger than one thousand three hundred (1,300) horsepower that is located within specific counties of the state. This regulation does not apply. The units are located in Grundy County, which does not appear in the list of affected counties found in 6.390(1).

10 CSR 10-6.400 Restriction of Emission of Particulate Matter from Industrial Processes

This regulation applies to operations, processes, or activities that emit particulate matter. The twelve (12) engines operate by combusting diesel fuel #2. The definition of process weight is the total weight of all materials introduced into an emission unit, but excludes liquids used solely as fuels for purposes of combustion. Therefore, this regulation does not apply as per 6.020(2)(P)(60).

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).

MEMORANDUM

DATE: January 30, 2015
TO: 2014-06-037
FROM: Jacob R. Robinett
SUBJECT: Response to Public Comments

Comments were received from Leslye Werner, Acting Chief of Air Permitting and Compliance Branch of EPA Region 7, on December 4, 2014, Peter Muzio, Environmental Specialist of Northeast Regional Office of Missouri Department of Natural Resources, on December 4, 2014, and Chad Davis, P.E., Utility Director of Trenton Municipal Utilities, on December 16, 2014. The comments are addressed in the order in which they appear within the letter(s).

The following are comments received from Leslye Werner:

Comment #1: Permit Condition 3 incorporates the applicable requirements for Trenton Municipal Utilities compression ignition (CI) stationary reciprocating internal combustion engines (RICE) as detailed 40 CFR Part 63, Subpart ZZZZ; National Emission Standards for Hazardous Air Pollutants (NESHAPs). This rulemaking is more notably referred to as the RICE MACT. The draft operating permit includes a listing of all of the diesel engines at both the South Substation and North Substation and the descriptions associated with the engine listing included the engine output in kW and in MMBtu/hr. However, the RICE MACT applicable requirements are given according to engine horsepower. To facilitate the review of the permit conditions being applicable to the listed engines, EPA recommends MDNR provide the horsepower rating of each engine. Also, Permit Condition 3 requires the permittee (Trenton Municipal Utilities) to demonstrate initial compliance with each emission limitation, operating limitation and other requirements that apply according to Table 5 of 40 CFR Part 63, Subpart ZZZZ. The draft operating permit includes an excerpt from Table 5 indicating the compliance method chosen by Trenton Municipal Utilities is to limit and reduce the concentration of CO, using oxidation catalyst and using a CPMS. Permit Condition 3 additionally includes a section on continuous compliance which requires Trenton Municipal Utilities to demonstrate continuous compliance with each emission limitation, operating limitation and other requirements that apply, according to Table 6 of 40 CFR Part 63, Subpart ZZZZ. The draft operating permit includes and excerpt from Table 6 indicating the

compliance method of choice is to “reduce CO emissions, or limit the concentration of CO in the stationary RICE exhaust and not using oxidation catalyst.” It is unclear to the EPA why Trenton Municipal Utilities is using oxidation catalyst to demonstrate initial compliance and is not using an oxidation catalyst to demonstrate continuous compliance and recommends MDNR provide additional explanation. Additionally, if oxidation catalyst is being employed, the installation description should be expanded to include a discussion of the pollution control methods being used by Trenton Municipal Utilities.

Response to Comment: The table has been modified and the horsepower rating for each engine has been included as well as the engine output in kW and in MMBtu/hr.

Comment #2: The installation description on the cover page of the draft Part 70 operating permit says “*the permittee is an area source for HAP’s and major source for NOx.*” Therefore, the five (5) North Substation reciprocating internal combustion engines (RICE) and seven (7) South Substation reciprocating internal combustion engines (RICE) are located at facilities which are area sources of hazardous air pollutants (HAPs). To date, MDNR has not accepted and taken on compliance responsibilities of the area source RICE NESHAPs and as such relies on the EPA to monitor and manage area source compliance. However, the compliance notification and reporting included in Permit Condition 3 require the permittee to submit the information only to MDNR in Jefferson City. EPA would contend that if the EPA is responsible for compliance, then the EPA should be the primary recipient of the compliance notification and reports; with MDNR receiving duplicate copies. Therefore, EPA recommends MDNR modify the permit condition to show EPA as the primary compliance information recipient related to HAPs and MDNR as secondary.

Response to Comment: Permit Condition 3 has been modified so that the EPA is the primary recipient of compliance notification and reports and will be sent to Missouri Air Compliance Coordinator; EPA Region 7 at 11201 Renner Boulevard, Lenexa, Kansas 66219.

Comment #3: The monitoring / record keeping requirement #1 in Permit Condition 4 directs the permittee to “see Permit Condition 3 for fuel specifications.” However, the fuel specification in Permit Condition 3, in the draft Part 70 operating permit, is not readily identifiable. Therefore, a direct reference to Permit Condition 3, emission limitation requirement #2 would improve identification of the Permit Condition 4 requirement. EPA suggests MDNR modify the monitoring / record keeping requirement #1 in Permit Condition 4.

Response to Comment: Permit Condition 4 has been modified to directly reference the fuel specification located in Permit Condition 3.

Comment #4: The installation Description in Section I opens with a paragraph describing the facilities to be included in this Part 70 operating permit. The opening paragraph is followed by a paragraph discussing a “Crowder Road plant.” This second paragraph comes across as an afterthought and a more complete explanation describing the Crowder Road plant and its relationship to Trenton Municipal Utilities would enhance the

installation description. Therefore, EPA suggests MDNR provide a more cohesive installation description in the operating permit.

Response to Comment: The installation description has been modified to give a better understanding of the Crowder Road plant and its relationship to Trenton Municipal Utilities.

Comment #5: The Statement of Basis includes a section titled Compliance Date Extension. However, there is no explanation of what compliance extension is being granted. It appears to the EPA, that the extension of compliance is associated with the RICE NESHAPs compliance; however, MDNR needs to provide that information. Also, if the approved extension included a (any) milestones(s), those milestones are likely applicable requirements. Lastly, the compliance extension ended on May 1, 2014 and this Part 70 operating permit will be issued well beyond the May date. Therefore, EPA recommends MDNR relook at the necessity of retaining this Compliance Date Extension discussion in the Statement of Basis.

Response to Comment: This discussion was originally intended to be about the RICE NESHAP, however based on correspondence with the EPA, Trenton Municipal Utilities is in compliance. The Compliance Date Extension discussion is no longer needed and has been removed from the permit. A discussion about the compliance date has been included in the Statement of Basis under the MACT Applicability section.

The following comments were received from Peter Muzio:

Comment #1: Permit Page 6, Reporting

Permit writer states: “1. The permittee shall report to the Air Pollution Control Program’s Enforcement Section P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after the end of the month during Attachment B, in Special Condition #1.B indicates that the source exceeds the limitation of Special Condition #1.A. [Special Condition #1.C.]”

Suggestion: Recommend clarification.

Response to Comment: Wording of the Reporting Condition #1 has been modified for clarification as to when the permittee needs to report an exceedance in emissions.

Comment #2: Permit Page 7, Reporting

Permit writer states: “1. The permittee shall report to the Air Pollution Control Program’s Enforcement Section P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after the end of the month during Attachment C, in Special Condition #3.B indicates that the source exceeds the limitation of Special Condition #3.A. [Special Condition #3.C.]”

Suggestion: Recommend clarification.

Response to Comment: Wording of the Reporting Condition #1 has been modified for clarification as to when the permittee needs to report an exceedance in emissions.

Comment #3: Area: Statement of Basis, Maximum Achievable Control Technology (MACT) Applicability

Permit writer states under MACT ZZZZ; “in the Operating Permit application, the installation indicated that although the compliance date was May 3, 2013, the facility requested a one year extension. EPA Region 7 granted the extension on April 17, 2013 with an expiration date of May 1, 2014. Installation of the control equipment began in October of 2013. Operations of the engines for production will not resume until the emission control equipment and monitoring equipment installation has been completed.

The application also states the initial compliance test has not been scheduled yet. The notification of intent to test should be submitted to EPA Region 7 at least 60 days prior to the initial compliance test once the test date is known.”

Suggestion: Recommend removal.

Justification – the plant completed the certification testing in August 2014, communicated with EPA regarding the testing and results, results on file at APCP and NERO.

Response to Comment: This discussion was originally intended to be about the RICE NESHAP, however based on correspondence with the EPA, Trenton Municipal Utilities is in compliance. The Compliance Date Extension discussion is no longer needed and has been removed from the permit. A discussion about the compliance date has been included in the Statement of Basis under the MACT Applicability section.

Comment #4: Area: Statement of Basis Current situation, pages are numbered 1-6.

Suggestion: Recommend numbering “SB-1, SB-2, etc”

Response to Comment: Page numbering has been corrected to “SB-1, SB-2, etc.”

Comment #5: Page 33, Attachment B, Monthly NO_x Emission Tracking Records at the South Substation

Current situation: Legend note: “(b) Use the emission factor of 432.32 lb/Mgal as referenced in permit 072000-006A”

Suggestion: Recommend placing “432.32” in each row of column B.

Justification: if the number is known, this will aid inspectors and plant record keepers in seeing at a glance the correct factor number for the fuel used.

Response to Comment: NO_x emission factor of 432.32 lb/Mgal has been placed into each row of Column B to aid inspectors and plant record keepers.

Comment #6: Page 34, Attachment C, Monthly NO_x Emission Tracking Records at the North Substation

Current situation: Legend note: “(b) Use the emission factor of 438 lb/Mgal as per SCC code 20200401”

Suggestion: Recommend placing “438” in each row of column B.

Justification: if the number is known, this will aid inspectors and plant record keepers in seeing at a glance the correct factor number for the fuel used.

Response to Comment: NO_x emission factor of 438 lb/Mgal has been placed into each row of Column B to aid inspectors and plant record keepers.

The following are comments received from Chad Davis:

Comment #1: Permit Condition 2 (page 7): Unfortunately after a number of reviews of draft permits we overlooked a mistake in the date for installation of one of the units. Emission unit EP7 (which is EMD #5 at the North Substation) was installed one year later than the other four units. We would suggest that the installation date for emission unit EP7 should be June 1, 1974.

Response to Comment: Based on correspondence with Chad Davis, P.E. of Trenton Municipal Utilities on January 6, 2015, EP7 was installed one year after the other 4 units at the North Substation. EP7’s installation date has been modified to June 1, 1975 in Permit Condition 2 instead of the suggested June 1, 1974.

Comment #2: Permit Condition 3 (page 8): Emission unit EP7 (which is EMD #5 at the North Substation) was installed one year later than the other four units. We would suggest that the installation date for emission unit EP7 should be June 1, 1974.

Response to Comment: Based on correspondence with Chad Davis, P.E. of Trenton Municipal Utilities on January 6, 2015, EP7 was installed one year after the other 4 units at the North Substation. EP7’s installation date has been modified to June 1, 1975 in Permit Condition 3 instead of the suggested June 1, 1974.

Comment #3: Permit Condition 4 (Page 17): It is our understanding that the requirements associated with permit condition 4 should be applicable to all the engines at both the north and south substations so presumably the chart for permit condition 4 should be a duplicate of the chart for permit condition 3 on page 8, including the revised installation date of emission unit EP7.

Response to Comment: Permit Condition 4 is applicable to all engines at both the north and south substation. The chart with the North Substation was not on the draft placed for public comment but has since been added.

Based on correspondence with Chad Davis, P.E. of Trenton Municipal Utilities on January 6, 2015, EP7 was installed one year after the other 4 units at the North Substation. EP7’s installation date has been modified to June 1, 1975 in Permit Condition 4 instead of the suggested June 1, 1974.