

MISSOURI
DEPARTMENT OF
NATURAL RESOURCES
Air Pollution Control Program

INTERMEDIATE STATE PERMIT TO OPERATE

Under the authority of RSMo 643 and the Federal Clean Air Act the applicant is authorized to operate the air contaminant source(s) described below, in accordance with the laws, rules, and conditions set forth herein.

Intermediate Operating Permit Number: OP2017-078
Expiration Date: OCT 23 2022
Installation ID: 171-0005
Project Number: 2017-05-019

Installation Name and Address

Unionville Power & Light
2221 Main Street
Unionville, MO 63565
Putnam County

Parent Company's Name and Address

Unionville Power & Light
2221 Main Street
Unionville, MO 63565

Installation Description:

Unionville Power & Light is a power plant that generates electricity for Unionville only during periods of blackouts when power goes down from other sources. The installation has engines and diesel storage tanks. While some of the engines are dual natural gas and diesel fueled, only diesel fuel is currently used in the engines. This installation is subject to MACT ZZZZ and is not on the List of Named Installations. This installation has been previously classified as a basic installation by error; this initial intermediate operating permit has been issued in response to correct this. This installation is a synthetic minor source of NO_x and a synthetic de minimis source of SO_x.

Prepared by:
Kasia Wasescha
Operating Permit Unit

Director or Designee
Department of Natural Resources

OCT 23 2017

Effective Date

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I. Installation Equipment Listing

EMISSION UNITS WITH LIMITATIONS

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

Emission Point	Description	Manufacturer
EP-01	Engine #1; diesel fueled; 800 kW (1,072.8 hp); constructed 1944	Superior
EP-02	Engine #2; dual diesel and natural gas fueled; 1600 kW (2,145.6 hp); constructed 1970	Fairbanks Morse
EP-03	Engine #3; diesel fueled; 250 kW (335.3 hp); constructed 1936	Fairbanks Morse
EP-04	Engine #4; diesel fueled; 1000 kW (1,341.0 hp); constructed 1956	Superior
EP-05	Engine #5; diesel fueled; 380 kW (509.6 hp); constructed 1948	Superior
EP-06	Engine #6; diesel fueled; 380 kW (509.6 hp); constructed 1948	Superior
EP-07	Engine #7; diesel fueled; 1165 kW (1,562.3 hp); constructed 1948	Fairbanks Morse
EP-08	Engine #8; dual diesel and natural gas fueled; 1360 kW (1,823.8 hp); constructed 1957	Fairbanks Morse
EP-09	Engine #9; diesel fueled; 2000 kW (2,682.0 hp); constructed 1975	EMD GM

EMISSION UNITS WITHOUT SPECIFIC LIMITATIONS

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

Emission Point	Description
EP-11	Diesel storage tank; inside plant; 250 gal
EP-12	Diesel storage tank; inside plant; < 250 gal
EP-13	Diesel storage tank; inside plant; < 250 gal
EP-14	Diesel storage tank; inside plant; 538 gal
EP-15	Diesel storage tank; inside plant; 250 gal
EP-16	Diesel storage tank; inside plant; 250 gal
EP-17	Diesel storage tank; inside plant; 250 gal
EP-18	Diesel storage tank; inside plant; 564 gal
EP-19	Diesel storage tank; outside plant; 15,783 gal
EP-20	Diesel storage tank; outside plant; 10,357 gal
EP-21	Diesel storage tank; outside plant; 10,357 gal
EP-22	Diesel storage tank; inside plant; 250 gal

II. Plant Wide Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect on the date of permit issuance. The plant wide conditions apply to all emission units at this installation. All emission units are listed in Section I under Emission Units with Limitations and Emission Units without Limitations.

PERMIT CONDITION PW001

10 CSR 10-6.060 Construction Permits Required
Construction Permit 1196-019, issued November 26, 1996

Emission Limitation:

The permittee shall emit less than 99 tons of NO_x in any consecutive rolling 12-month period from the entire installation. [Special Condition 1]

Monitoring/Recordkeeping:

1. The permittee shall use Attachment A, or an equivalent, to track monthly and 12-month rolling total NO_x emissions. [Special Condition 3]
2. The permittee shall keep all records on-site for a minimum of 5 years. [Special Condition 3]
3. The permittee shall make all records available to any Missouri Department of Natural Resources' personnel upon request. [Special Condition 3]

Reporting:

1. The permittee shall report to the Air Pollution Control Program's Compliance/Enforcement Section, no later than ten (10) days after the end of any month in which the NO_x limitation is exceeded. [Special Condition 4]
2. The permittee shall report any deviations from the emission limitation, monitoring, recordkeeping, and reporting requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

PERMIT CONDITION PW002

10 CSR 10-6.060 Construction Permits Required
Construction Permit 1196-019, issued November 26, 1996

Emission Limitation:

The permittee shall emit less than 40 tons SO_x in any consecutive rolling 12-month period from the entire installation. [Special Condition 2]

Operational Limitation:

The permittee shall limit sulfur content to be less than or equal to 1% by weight. [Special Condition 2]

Monitoring/Recordkeeping:

1. The permittee shall keep records of monthly and 12-month rolling total SO_x emissions using Attachment B, or an equivalent. [Special Condition 3]

2. The permittee shall keep records of the sulfur content of diesel fuels used. [Special Condition 3]
3. The permittee shall keep all records on-site for a minimum of 5 years. [Special Condition 3]
4. The permittee shall make all records available to any Missouri Department of Natural Resources' personnel upon request. [Special Condition 3]

Reporting:

1. The permittee shall report to the Air Pollution Control Program's Compliance/Enforcement Section, no later than ten (10) days after the end of any month in which the SO_x limitation or sulfur content limit is exceeded. [Special Condition 4]
2. The permittee shall report any deviations from the emission limitation, operational limitation, monitoring, recordkeeping, and reporting requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

III. Emission Unit Specific Emission Limitations

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

PERMIT CONDITION 001	
10 CSR 10-6.075, Maximum Achievable Control Technology Regulations 40 CFR Part 63, Subpart ZZZZ – National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines	
Emission Point	Description
EP-01	Engine #1; diesel fueled; 800 kW; constructed 1944
EP-02	Engine #2; dual diesel and natural gas fueled; 1600 kW; constructed 1970
EP-03	Engine #3; diesel fueled; 250 kW; constructed 1936
EP-04	Engine #4; diesel fueled; 1000 kW; constructed 1956
EP-05	Engine #5; diesel fueled; 380 kW; constructed 1948
EP-06	Engine #6; diesel fueled; 380 kW; constructed 1948
EP-07	Engine #7; diesel fueled; 1165 kW; constructed 1948
EP-08	Engine #8; dual diesel and natural gas fueled; 1360 kW; constructed 1957
EP-09	Engine #9; diesel fueled; 2000 kW; constructed 1975

Operational Limitation:

1. The permittee must comply with the requirements in Table 2d of MACT ZZZZ.¹ [§63.6603(a) & Table 2d of MACT ZZZZ]
 - a) Change oil and filter every 1,000 hours of operation or annually, whichever comes first;²
 - b) Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and
 - c) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.
2. The permittee must use diesel fuel that meets the requirements in 40 CFR §80.510(b) for nonroad diesel fuel: [§63.6604(a)]
 - a) A maximum sulfur content of 15 ppm_w; [§80.510(b)(1)(i)]
 - b) Cetane index or aromatic content, as follows: [§80.510(b)(2)]
 - i) A minimum cetane index of 40; or [§80.510(b)(2)(i)]
 - ii) A maximum aromatic content of 35 volume percent. [§80.510(b)(2)(ii)]

General Compliance Requirements:

1. The permittee must be in compliance with the operational limitations and other requirements in this permit condition at all times. [§63.6605(a)]

¹ The permittee does not need to meet the numerical CO emission limitations specified in Table 2d to MACT ZZZZ due to having a generating capacity of less than 12 MW. [§63.6603(b)(2)(iii)]

² The permittee has the option to utilize an oil analysis program as described in §63.6625(i) in order to extend the specified oil change requirement in Table 2d of MACT ZZZZ.

2. The permittee must at all times 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)]
3. If any of the engines do not already have a closed crankcase ventilation system installed, the permittee must comply with the following: [§63.6605(g)]
 - a) The permittee shall install a closed crankcase ventilation system that prevents crankcase emissions from being emitted to the atmosphere, or [§63.6605(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. [§63.6605(g)(2)]
4. The permittee 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. [§63.6605(g)]

General Provisions:

The permittee shall comply with the applicable General Provisions in §§63.1 through 63.15 as listed in Table 8 of MACT ZZZZ. [§63.6665]

Continuous Compliance Requirements:

1. The permittee shall demonstrate continuous compliance with each operating limitation and other requirements in this condition according to the methods specified below: [§63.6640(a) and Table 6 to MACT ZZZZ]
 - a) Operate and maintain the stationary RICE according to the manufacturer's emission-related operation and maintenance instructions; or
 - b) The permittee may develop and follow their own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.

Notifications:

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

Recordkeeping:

1. The permittee shall keep the following records: [§63.6655(a)]
 - a) A copy of each notification and report that they submitted to comply with MACT ZZZZ, including all documentation supporting any Initial Notification or Notification of Compliance Status submitted, according to the requirement in §63.10(b)(2)(xiv). [§63.6655(a)(1)]
 - b) Records of the occurrence and duration of each malfunction of operation (i.e. process equipment) or the air pollution control and monitoring equipment. [§63.6655(a)(2)]
 - c) Records of 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. The permittee must keep the records required in Table 6 of MACT ZZZZ to show continuous compliance with each operating limitation that applies. [§63.6655(d)]
3. The permittee must keep records of the maintenance conducted on the stationary RICE in order to demonstrate that they operated and maintained the stationary RICE according to their own maintenance plan. [§63.66559(e)]
4. The permittee shall keep all fuel records which indicate sulfur content, cetane index, and aromatic content of fuel used.
5. Records may be kept in either written or electronic form and maintained for at least five years. [§63.6660(c)]
6. These records shall be made available immediately for inspection to any Missouri Department of Natural Resources' personnel upon request. [§63.6660(a)]

Reporting:

1. The permittee shall report each instance in which they did not meet the requirements of this permit condition or Table 2d of MACT ZZZZ according to the requirements in §63.6650. [§63.6640(b)]
2. The permittee must also report each instance in which they did not meet the requirements in Table 8 of MACT ZZZZ that apply. [§63.6640(e)]
3. The permittee shall submit applicable reports as specified in §63.6650 to the Missouri Air Compliance Coordinator at EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219 and shall send copies to the Missouri Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102.
4. The permittee shall report any deviations from the operational limitation, compliance requirements, notifications, recordkeeping, and reporting requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

PERMIT CONDITION 002	
10 CSR 10-6.261, Control of Sulfur Dioxide Emissions	
Emission Point	Description
EP-09	Engine #9; diesel fueled; 2000 kW; constructed 1975

Note: As of issuance of this permit, 10 CSR 10-6.261 is a State Only requirement³

Operational Limitation:

Fuel sulfur content for EP-09 will not contain more than 8,812 parts per million (ppm_v) of sulfur for distillate fuel.

Monitoring/Recordkeeping:

1. The permittee shall determine compliance using fuel delivery records, fuel sampling and analysis, or other compliance methods approved by the staff director and the U.S. Environmental Protection agency and incorporated into the state implementation plan.
2. The permittee must maintain a list of modifications to the source's operating procedures or other routine procedures instituted to prevent or minimize the occurrence of any excess emissions.
3. The permittee must maintain a record of data, calculations, results, records and reports from any performance test, continuous emission monitoring, fuel deliveries, and/or fuel sampling tests.
4. The permittee must maintain a record of any applicable monitoring data, performance evaluations, calibration checks, monitoring system and device performance tests, and any adjustments and maintenance performed on these systems or devices.
5. If the permittee is using fuel delivery records for compliance they must also maintain the fuel supplier certification information to certify all fuel deliveries. Bills of lading and/or other fuel deliver documentation containing the following information for all fuel purchases or deliveries are deemed acceptable to comply with the requirements of this rule:
 - a) The name, address, and contact information of the fuel supplier;
 - b) The type of fuel;
 - c) The sulfur content or maximum sulfur content expressed in percent sulfur by weight or in ppm sulfur; and
 - d) The heating value of the fuel.
6. The permittee shall maintain records for a minimum of five (5) years on-site.
7. The permittee shall make all records immediately available to Missouri Department of Natural Resources' personnel upon request.

Reporting:

1. The permittee must report any excess emissions other than startup, shutdown and malfunction excess emissions to the staff director for each calendar quarter within thirty (30) days following the end of the quarter. In all cases, the notification must be a written report and must include, at a minimum, the following:
 - a) Name and location of source;
 - b) Name and telephone number of person responsible for the source;
 - c) Identity and description of the equipment involved;

³ This regulation has not yet been adopted into Missouri's SIP; therefore, this regulation is a state only requirement. Upon adoption into Missouri's SIP this regulation will be both a state and federal requirement. No action on the part of the permittee is needed to revise the operating permit.

- d) Time and duration of the period of excess emissions;
 - e) Type of activity;
 - f) Estimate of the magnitude of the excess emissions expressed in the units of the applicable emission control regulation and the operating data and calculations used in estimating the magnitude;
 - g) Measures taken to mitigate the extent and duration of the excess emissions;
 - h) Measures taken to remedy the situation which cause the excess emissions and the measures taken or planned to prevent the recurrence of these situations.
2. The permittee shall report any deviations from the limitations, monitoring, recordkeeping, and reporting requirements of this permit condition in the annual monitoring report and annual compliance certification required by Section V of this permit.
 3. The permittee shall report to the Air Pollution Control Program’s Compliance/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.

PERMIT CONDITION 003	
10 CSR 10-6.260, Restriction of Emission of Sulfur Compounds	
Emission Point	Description
EP-01	Emergency Engine #1; diesel fueled; 800 kW; constructed 1944
EP-02	Emergency Engine #2; dual diesel and natural gas fueled; 1600 kW; constructed 1970
EP-03	Emergency Engine #3; diesel fueled; 250 kW; constructed 1936
EP-04	Emergency Engine #4; diesel fueled; 1000 kW; constructed 1956
EP-05	Emergency Engine #5; diesel fueled; 380 kW; constructed 1948
EP-06	Emergency Engine #6; diesel fueled; 380 kW; constructed 1948
EP-07	Emergency Engine #7; diesel fueled; 1165 kW; constructed 1948
EP-08	Emergency Engine #8; dual diesel and natural gas fueled; 1360 kW; constructed 1957
EP-09	Engine #9; diesel fueled; 2000 kW; constructed 1975

Note: As of issuance of this permit, 10 CSR 10-6.260 is a Federal Only requirement⁴

Emission Limitation:

1. EP-01 through EP-08:
 - a) The permittee shall not allow the emission in the atmosphere gases containing more than two thousand parts per million by volume (2,000 ppm_v) of sulfur dioxide from the engines.
 - b) Stack gases from the engines shall not contain more than seventy milligrams per cubic meter (70 mg/m³) of sulfuric acid or sulfur trioxide or any combination of those gases averaged on any consecutive three (3)-hour time period.
2. EP-09:
 - a) The permittee shall not allow the emission in the atmosphere gases containing more than five hundred parts per million by volume (500 ppm_v) of sulfur dioxide from the engines.

⁴ This regulation was rescinded from Missouri Code of State Regulations on November 30, 2015 but it still remains in the EPA-approved SIP and thus still remains an applicable federal regulation. Upon adoption of 10 CSR 10-6.261 into Missouri’s SIP, 10 CSR 6.260 will be removed from the SIP and thus this rule will no longer be applicable to the installation. No action on the part of the permittee is needed to revise the operating permit. Upon removal of 10 CSR 10-6.260 from the SIP, Permit Condition 003 shall no longer be enforceable.

- b) Stack gases from the engines shall not contain more than thirty five milligrams per cubic meter (35 mg/m^3) of sulfuric acid or sulfur trioxide or any combination of those gases averaged on any consecutive three (3)-hour time period.

Monitoring/Recordkeeping:

As required by Permit Condition 002.

Reporting:

1. The permittee shall report to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten 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 from the emission limitations, monitoring, recordkeeping, and reporting requirements of this permit condition in the annual monitoring report and annual compliance certification required by Section V of this permit.

IV. Core Permit Requirements

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

10 CSR 10-6.045 Open Burning Requirements

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

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

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

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

10 CSR 10-6.060 Construction Permits Required

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

10 CSR 10-6.065 Operating Permits

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

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

- 1) The permittee shall submit a Full Emissions Report either electronically via MoEIS, which requires Form 1.0 signed by an authorized company representative, or on Emission Inventory Questionnaire (EIQ) paper forms on the frequency specified in this rule and in accordance with the requirements outlined in this rule. Alternate methods of reporting the emissions, such as spreadsheet file, can be submitted for approval by the director.
- 2) Public Availability of Emission Data and Process Information. Any information obtained pursuant to the rule(s) of the Missouri Air Conservation Commission that would not be entitled to confidential treatment under 10 CSR 10-6.210 shall be made available to any member of the public upon request.
- 3) The permittee shall submit a full EIQ for the 2017 and 2020 reporting years. In the interim years the installation may submit a Reduced Reporting Form; however, if the installation's emissions increase or decrease by more than five tons when compared to their last submitted full EIQ, the installation shall submit a full EIQ rather than a Reduced Reporting Form.
- 4) In addition to the EIQ submittal schedule outlined above, any permit issued under 10 CSR 10-6.060 section (5) or (6) triggers a requirement that a full EIQ be submitted in the first full calendar year after the permitted equipment initially operates.

10 CSR 10-6.130 Controlling Emissions During Episodes of High Air Pollution Potential

This rule specifies the conditions that establish an air pollution alert (yellow/orange/red/purple), or emergency (maroon) and the associated procedures and emission reduction objectives for dealing with each. The permittee shall submit an appropriate emergency plan if required by the Director.

10 CSR 10-6.150 Circumvention

The permittee shall not cause or permit the installation or use of any device or any other means which, without resulting in reduction in the total amount of air contaminant emitted, conceals or dilutes an emission or air contaminant which violates a rule of the Missouri Air Conservation Commission.

10 CSR 10-6.165 Restriction of Emission of Odors

This is a State Only permit requirement.

No person may cause, permit or allow the emission of odorous matter in concentrations and frequencies or for durations that odor can be perceived when one volume of odorous air is diluted with seven volumes of odor-free air for two separate trials not less than 15 minutes apart within the period of one hour.

10 CSR 10-6.170 Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin

Emission Limitation:

- 1) The permittee shall not cause or allow to occur any handling, transporting or storing of any material; construction, repair, cleaning or demolition of a building or its appurtenances; construction or use of a road, driveway or open area; or operation of a commercial or industrial installation without applying reasonable measures as may be required to prevent, or in a manner which allows or may allow, fugitive particulate matter emissions to go beyond the premises of origin in quantities that the particulate matter may be found on surfaces beyond the property line of origin. The nature or origin of the particulate matter shall be determined to a reasonable degree of certainty by a technique proven to be accurate and approved by the director.
- 2) The permittee shall not cause nor allow to occur any fugitive particulate matter emissions to remain visible in the ambient air beyond the property line of origin.
- 3) Should it be determined that noncompliance has occurred, the director may require reasonable control measures as may be necessary. These measures may include, but are not limited to, the following:
 - a) Revision of procedures involving construction, repair, cleaning and demolition of buildings and their appurtenances that produce particulate matter emissions;
 - b) Paving or frequent cleaning of roads, driveways and parking lots;
 - c) Application of dust-free surfaces;
 - d) Application of water; and
 - e) Planting and maintenance of vegetative ground cover.

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 10-6.280 Compliance Monitoring Usage

- 1) The permittee is not prohibited from using the following in addition to any specified compliance methods for the purpose of submission of compliance certificates:

- a) Monitoring methods outlined in 40 CFR Part 64;
 - b) Monitoring method(s) approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
 - c) Any other monitoring methods approved by the director.
- 2) Any credible evidence may be used for the purpose of establishing whether a permittee has violated or is in violation of any such plan or other applicable requirement. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred at an installation:
- a) Monitoring methods outlined in 40 CFR Part 64;
 - b) A monitoring method approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
 - c) Compliance test methods specified in the rule cited as the authority for the emission limitations.
- 3) The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
- a) Applicable monitoring or testing methods, cited in:
 - i) 10 CSR 10-6.030, "Sampling Methods for Air Pollution Sources";
 - ii) 10 CSR 10-6.040, "Reference Methods";
 - iii) 10 CSR 10-6.070, "New Source Performance Standards";
 - iv) 10 CSR 10-6.080, "Emission Standards for Hazardous Air Pollutants"; or
 - b) Other testing, monitoring, or information gathering methods, if approved by the director, that produce information comparable to that produced by any method listed above.

40 CFR Part 82 Protection of Stratospheric Ozone (Title VI)
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- 1) The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
 - a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to 40 CFR §82.106.
 - b) The placement of the required warning statement must comply with the requirements of 40 CFR §82.108.
 - c) The form of the label bearing the required warning statement must comply with the requirements of 40 CFR §82.110.
 - d) No person may modify, remove, or interfere with the required warning statement except as described in 40 CFR §82.112.
- 2) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B of 40 CFR Part 82:
 - a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices described in 40 CFR §82.156.
 - b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment described in 40 CFR §82.158.
 - c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR §82.161.

- d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with the record keeping requirements of 40 CFR §82.166. ("MVAC-like" appliance as defined at 40 CFR §82.152).
 - e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to 40 CFR §82.156.
 - f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR §82.166.
- 3) If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.
 - 4) If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements contained in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.
 - 5) The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program. *Federal Only - 40 CFR Part 82.*

V. General Permit Requirements

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

10 CSR 10-6.065, §(5)(C)1, §(6)(C)1.B, §(5)(E)2.C 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. If a timely and complete application for a permit renewal is submitted, but the Air Pollution Control Program fails to take final action to issue or deny the renewal permit before the end of the term of this permit, this permit shall not expire until the renewal permit is issued or denied.

10 CSR 10-6.065, §(5)(C)1 and §(6)(C)1.C General Record Keeping and Reporting Requirements

- 1) Record Keeping
 - a) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
 - b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any Missouri Department of Natural Resources' personnel upon request.
- 2) Reporting
 - a) All reports shall be submitted to the Air Pollution Control Program, Compliance and Enforcement Section, P. O. Box 176, Jefferson City, MO 65102.
 - b) The permittee shall submit a report of all required monitoring by:
 - i) April 1st for monitoring which covers the January through December time period.
 - ii) Exception. Monitoring requirements which require reporting more frequently than annually shall report no later than 30 days after the end of the calendar quarter in which the measurements were taken.
 - c) Each report shall identify any deviations from emission limitations, monitoring, record keeping, reporting, or any other requirements of the permit.
 - d) Submit supplemental reports as required or as needed. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
 - i) Notice of any deviation resulting from an emergency (or upset) condition as defined in paragraph (6)(C)7 of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two working days after the date on which the emission limitation is exceeded due to the emergency, if the permittee wishes to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and the permittee can identify the cause(s) of the emergency. The permitted installation must show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or requirements in the permit. The notice must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.

- ii) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.
- iii) Any other deviations identified in the permit as requiring more frequent reporting than the permittee's annual report shall be reported on the schedule specified in this permit, and no later than ten days after any exceedance of any applicable rule, regulation, or other restriction.
- e) Every report submitted shall be certified by the responsible official, except that, if a report of a deviation must be submitted within ten days after the deviation, the report may be submitted without a certification if the report is resubmitted with an appropriate certification within ten days after that, together with any corrected or supplemental information required concerning the deviation.
- f) The permittee may request confidential treatment of information submitted in any report of deviation.

10 CSR 10-6.065 §(5)(C)1 and §(6)(C)1.D Risk Management Plan Under Section 112(r)

If the installation is required to develop and register a risk management plan pursuant to Section 112(R) of the Act, the permittee will verify that it has complied with the requirement to register the plan.

10 CSR 10-6.065(5)(C)1.A General Requirements

- 1) The permittee must comply with all of the terms and conditions of this permit. Any noncompliance with a permit condition constitutes a violation and is grounds for enforcement action, permit termination, permit revocation and re-issuance, permit modification or denial of a permit renewal application.
- 2) The permittee may not use as a defense in an enforcement action that it would have been necessary for the permittee to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit
- 3) The permit may be modified, revoked, reopened, reissued or terminated for cause. Except as provided for minor permit modifications, the filing of an application or request for a permit modification, revocation and reissuance, or termination, or the filing of a notification of planned changes or anticipated noncompliance, does not stay any permit condition.
- 4) This permit does not convey any property rights of any sort, nor grant any exclusive privilege.
- 5) The permittee shall furnish to the Air Pollution Control Program, upon receipt of a written request and within a reasonable time, any information that the Air Pollution Control Program reasonably may require to determine whether cause exists for modifying, reopening, reissuing or revoking the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the Air Pollution Control Program copies of records required to be kept by the permittee. The permittee may make a claim of confidentiality for any information or records submitted under this rule.
- 6) Failure to comply with the limitations and conditions that qualify the installation for an Intermediate permit make the installation subject to the provisions of 10 CSR 10-6.065(6) and enforcement action for operating without a valid part 70 operating permit.

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

None.

10 CSR 10-6.065, §(5)(B)4; §(5)(C)1, §(6)(C)3.B; and §(6)(C)3.D; and §(5)(C)3 and §(6)(C)3.E.(I) – (III) and (V) – (VI) Compliance Requirements

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

10 CSR 10-6.065, §(5)(C)1 and §(6)(C)7 Emergency Provisions

- 1) An emergency or upset as defined in 10 CSR 10-6.065(6)(C)7.A shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emissions limitations. To establish an emergency- or upset-based defense, the permittee must demonstrate, through properly signed, contemporaneous operating logs or other relevant evidence, the following:

- a) That an emergency or upset occurred and that the permittee can identify the source of the emergency or upset,
 - b) That the installation was being operated properly,
 - c) That the permittee took all reasonable steps to minimize emissions that exceeded technology-based emissions limitations or requirements in this permit, and
 - d) That the permittee submitted notice of the emergency to the Air Pollution Control Program within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.
- 2) Be aware that an emergency or upset shall not include noncompliance caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

10 CSR 10-6.065(5)(C)5 Off-Permit Changes

- 1) Except as noted below, the permittee may make any change in its permitted installation's operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Off-permit changes shall be subject to the following requirements and restrictions:
- a) The change must meet all applicable requirements of the Act and may not violate any existing permit term or condition; the permittee may not change a permitted installation without a permit revision if this change is a Title I modification; Please Note: Changes at the installation which affect the emission limitation(s) classifying the installation as an intermediate source (add additional equipment to the record keeping requirements, increase the emissions above major source level) do not qualify for off-permit changes.
 - b) The permittee must provide contemporaneous written notice of the change to the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219. This written notice shall describe each change, including the date, any change in emissions, pollutants emitted and any applicable requirement that would apply as a result of the change; and
 - c) The permittee shall keep a record describing all changes made at the installation that result in emissions of a regulated air pollutant subject to an applicable requirement and the emissions resulting from these changes.

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

The application utilized in the preparation of this permit was signed by Shawn Caley, Electric Superintendent. If this person terminates employment, or is reassigned different duties such that a different person becomes the responsible person to represent and bind the installation in environmental permitting affairs, the owner or operator of this air contaminant source shall notify the Director of the Air Pollution Control Program of the change. Said notification shall be in writing and shall be submitted within 30 days of the change. The notification shall include the name and title of the new person assigned by the source owner or operator to represent and bind the installation in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible person that were used in the establishment of limiting permit conditions on this permit will continue to be binding on the installation until such time that a revision to this permit is obtained that would change said representations, agreements and covenants.

10 CSR 10-6.065 §(5)(E)4 and §(6)(E)6.A(III)(a)-(c) Reopening-Permit for Cause

This permit may be reopened for cause if:

- 1) The Missouri Department of Natural Resources (MDNR) or EPA determines that the permit contains a material mistake or that inaccurate statements were made which resulted in establishing the emissions limitation standards or other terms of the permit,
- 2) Additional applicable requirements under the Act become applicable to the installation; however, reopening on this ground is not required if—:
 - a) The permit has a remaining term of less than three years;
 - b) The effective date of the requirement is later than the date on which the permit is due to expire;
 - or
 - c) The additional applicable requirements are implemented in a general permit that is applicable to the installation and the installation receives authorization for coverage under that general permit,
- 3) MDNR or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

10 CSR 10-6.065 §(5)(E)1.A and §(6)(E)1.C Statement of Basis

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

VI. Attachments

Attachments follow.

Attachment A
Monthly NO_x Tracking Sheet

This tracking sheet covers the period from _____ to _____.
(month, year) (month, year)

Emission Point	Description	Monthly Throughput	Emission Factor	EF Source	Monthly NO_x Emissions⁵ (tons)
EP-01	Engine #1 (diesel)	gal	0.438 lb/gal	SCC 20200401	
EP-02	Engine #2 (diesel)	gal	0.438 lb/gal	SCC 20200401	
	Engine #2 (dual)	kWh	0.0241 lb/kWh ⁶	SCC 20200402	
EP-03	Engine #3 (diesel)	gal	0.438 lb/gal	SCC 20200401	
EP-04	Engine #4 (diesel)	gal	0.438 lb/gal	SCC 20200401	
EP-05	Engine #5 (diesel)	gal	0.604 lb/gal	SCC 20100102	
EP-06	Engine #6 (diesel)	gal	0.604 lb/gal	SCC 20100102	
EP-07	Engine #7 (diesel)	gal	0.438 lb/gal	SCC 20200401	
EP-08	Engine #8 (diesel)	gal	0.438 lb/gal	SCC 20200401	
	Engine #8 (dual)	kWh	0.0241 lb/kWh	SCC 20200402	
EP-09	Engine #9 (diesel)	1000gal	438 lb/1000gal	SCC 20200401	
Start-up, Shutdown, and Malfunction (SSM) NO_x Emissions⁷ (tons/month):					
Sum of Monthly NO_x Emissions⁸ (tons/month):					
Rolling 12-Month Total of NO_x Emissions⁹ (tons/year):					

⁵ [Monthly NO_x Emissions] = [Monthly Throughput] × [Emission Factor] / 2000

⁶ Converted from the original factor of 0.018 lb/hp-hr as provided in AP-42, Table 3.4-1.

⁷ As reported to the Air Pollution Control Program's Compliance/Enforcement section for compliance with 10 CSR 10-6.050.

⁸ Sum of Monthly NO_x Emissions includes SSM NO_x emissions.

⁹ The sum of the most recent 12 months of NO_x emissions. Rolling 12-Month Total of NO_x emissions must be below 99 tons/year in order to demonstrate compliance.

Attachment B
Monthly SO_x Tracking Sheet

This tracking sheet covers the period from _____ to _____.
(month, year) (month, year)

Emission Point	Description	Monthly Throughput	Emission Factor¹⁰	EF Source	Monthly SO_x Emissions¹¹ (tons)
EP-01	Engine #1 (diesel)	gal	0.0138 lb/gal ¹²	SCC 20200401	
EP-02	Engine #2 (diesel)	gal	0.0138 lb/gal	SCC 20200401	
	Engine #2 (dual)	kWh	0.0134 lb/kWh ¹³	SCC 20200402	
EP-03	Engine #3 (diesel)	gal	0.0138 lb/gal	SCC 20200401	
EP-04	Engine #4 (diesel)	gal	0.0138 lb/gal	SCC 20200401	
EP-05	Engine #5 (diesel)	gal	0.0397 lb/gal	SCC 20100102	
EP-06	Engine #6 (diesel)	gal	0.0397 lb/gal	SCC 20100102	
EP-07	Engine #7 (diesel)	gal	0.0138 lb/gal	SCC 20200401	
EP-08	Engine #8 (diesel)	gal	0.0138 lb/gal	SCC 20200401	
	Engine #8 (dual)	kWh	0.0134 lb/kWh	SCC 20200402	
EP-09	Engine #9 (diesel)	gal	0.0138 lb/gal	SCC 20200401	
Start-up, Shutdown, and Malfunction (SSM) SO_x Emissions¹⁴ (tons/month):					
Sum of Monthly SO_x Emissions¹⁵ (tons/month):					
Rolling 12-Month Total of SO_x Emissions¹⁶ (tons/year):					

¹⁰ SO_x emission factor based on an assumption of 1 wt% sulfur content.

¹¹ [Monthly SO_x Emissions] = [Monthly Throughput] × [Emission Factor] / 2000

¹² Calculated from 1.01 lb/MMBtu as calculated from the equation provided in AP-42, Table 3.4-1.

¹³ Calculated from 0.01 lb/hp-hr as calculated from the equation provided in AP-42, Table 3.4-1.

¹⁴ As reported to the Air Pollution Control Program's Compliance/Enforcement section for compliance with 10 CSR 10-6.050.

¹⁵ Sum of Monthly SO_x Emissions includes SSM SO_x emissions.

¹⁶ The sum of the most recent 12 months of SO_x emissions. Rolling 12-Month Total of SO_x emissions must be below 40 tons/year in order to demonstrate compliance.

STATEMENT OF BASIS

Voluntary Limitations

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

INSTALLATION DESCRIPTION

Unionville Power & Light is a power plant that generates electricity for Unionville only during periods of blackouts when power goes down from other sources. The installation has engines and diesel storage tanks. While some of the engines are dual natural gas and diesel fueled, only diesel fuel is currently used in the engines. This installation is subject to MACT ZZZZ and is not on the List of Named Installations. This installation has been previously classified as a basic installation by error; this initial intermediate operating permit has been issued in response to correct this. This installation is a synthetic minor source of NO_x and a synthetic de minimis source of SO_x.

Updated Potential to Emit for the Installation

Pollutant	Potential to Emit (tons/yr) ¹⁷
PM ₁₀	3.19
PM _{2.5}	3.08
CO	25.75
NO _x	< 99
SO _x	< 40
VOCs	3.72
Total HAPs ¹⁸	0.21
Formaldehyde (50-00-0)	0.14

¹⁷ Each emission unit was evaluated at 8,760 hours of uncontrolled annual operation unless otherwise noted. The emissions from the other pollutants were scaled down proportionally based on the 40 ton/year limitation on SO_x.

¹⁸ Individual HAPs under 0.10 tons/year not listed.

Reported Air Pollutant Emissions, tons per year

Pollutants	2016	2015	2014	2013	2012
Particulate Matter ≤ Ten Microns (PM ₁₀)	0.01	0.32	0.32	0.32	0.32
Particulate Matter ≤ 2.5 Microns (PM _{2.5})	0.01	0.11	0.11	0.11	0.32
Sulfur Oxides (SO _x)	< 0.01	0.30	0.30	0.30	0.30
Nitrogen Oxides (NO _x)	0.57	4.55	4.55	4.55	4.55
Volatile Organic Compounds(VOC)	0.05	0.37	0.37	0.37	0.37
Carbon Monoxide (CO)	0.12	0.98	0.96	0.96	0.96
Hazardous Air Pollutants (HAPs) ¹⁹	-	-	-	-	-

Permit Reference Documents

These documents were relied upon in the preparation of the operating permit. Because they are not incorporated by reference, they are not an official part of the operating permit.

- 1) Intermediate Operating Permit Application, received May 9, 2017
- 2) 2016 Emissions Inventory Questionnaire, received January 10, 2017
- 3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition
- 4) Construction Permit 1196-019, issued November 26, 1996
- 5) Construction Permit 0694-001, issued May 23, 1994

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 that the following requirements are not applicable to this installation at this time for the reasons stated.

10 CSR 10-6.100, *Alternate Emission Limits*

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

¹⁹ HAPs are below the reporting threshold in the EIQ.

10 CSR 10-6.270, *Acid Rain Source Permits Required*

This rule does not apply. EP-01 through EP-08 are existing units exempt per §76.2(b) and EP-09 is a new unit exempt per §72.7. EP-09 remains exempt from the Acid Rain Program if it continues to burn diesel with an annual average sulfur content of 0.05 wt% or less as calculated in §72.7(d). The operating permit application indicated that the maximum sulfur content used in the engines is 15 ppm_w, which meets the sulfur content Acid Rain Program exemption in §72.7(a)(3). If the annual average sulfur content of the diesel fuel reaches above 0.05 wt%, EP-09 may become subject to the Acid Rain Program.

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

This rule does not apply. The engines are exempt from this rule due to being internal combustion engines, per 6.220(1)(A). The outside tanks are exempt for being fugitive sources, per 6.220(1)(K). The inside tanks are exempt because they are contained within and emit only with a building space, per 6.220(1)(O). Visible emissions are not expected from the tanks because they do not emit particulate matter.

10 CSR 10-6.360, *Control of NO_x Emissions From Electric Generating Units and Non-Electric Generating Boilers*

This rule does not apply. Putnam County is not on the list of applicable counties.

10 CSR 10-6.390, *Control of NO_x Emissions From Large Stationary Internal Combustion Engines*

This rule does not apply. Putnam County is not on the list of applicable counties.

10 CSR 10-6.400, *Restriction of Emission of Particulate Matter From Industrial Processes*

This rule does not apply. The engines do not meet the definition of process weight. Particulate matter is not emitted from the tanks.

Construction Permit History

Construction Permit 1196-019, issued November 26, 1996

This construction permit increased the annual NO_x emission limitation of the installation to 99 tons. While this construction permit does not explicitly state that any of the conditions in Construction Permit 0694-001 have been superseded, the intent was to increase the allowable emissions that were limited in Construction Permit 0694-001. As a result, it can be assumed that Construction Permit 1196-019 supersedes the conditions in Construction Permit 0694-001.

- Special Condition 1 limits the installation to 99 tons/year of NO_x. It has been added to this operating permit.
- Special Condition 2 limits the sulfur content of the diesel fuel used with the intention of limiting SO_x below de minimis levels. Since the intention was to limit SO_x below de minimis levels, the 40 tons/year SO_x has been added into this operating permit.
- Special Condition 3 requires recordkeeping of NO_x emissions. It has been added to this operating permit.
- Special Condition 4 requires recordkeeping of the sulfur content in the diesel fuel used and the monthly and annual emission of SO_x. Since the sulfur content limitation has been removed, the recordkeeping requirements were not included in this operating permit, but the requirement to track SO_x emissions has been added to this operating permit.

- Special Condition 5 is general requirements in the event of an exceedance of the limitations in this construction permit. It has been added to this operating permit.

Construction Permit 0694-001, issued May 23, 1994

This construction permit was for the addition of two engines and a diesel storage tank. It contains limitations on the amount of diesel fuel used for the intention of controlling NO_x emissions.

Construction Permit 1196-019's intention was to lower the limitations introduced in this construction permit, even if it does not explicitly state that Construction Permit 0694-001's conditions have been superseded. For purposes of this operating permit, it can be assumed that Construction Permit 0694-001's conditions have been superseded and do not have to be followed.

New Source Performance Standards (NSPS) Applicability

40 CFR Part 60, Subpart Kb – *Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984*

This subpart (or its derivatives, NSPS K and Ka) does not apply. All tanks are smaller than 75 m³.

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

This subpart does not apply. The engines at this installation are older than the applicability dates listed in this subpart.

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

This subpart does not apply. The engines at this installation are older than the applicability dates listed in this subpart.

Maximum Achievable Control Technology (MACT) Applicability

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

This subpart applies to all the engines and has been incorporated into this permit. While the permittee uses the engines only during periods of blackouts, which would seem to classify them as emergency use, the permittee does use the 50 hours per year of non-emergency use to provide relief to the grid under a financial arrangement when they exercise their engines every few months. §60.6640(f)(4) states that emergency engines cannot be used to supply power as part of a financial arrangement with another entity, except as provided under §63.6640(f)(4)(i) and (ii). While they might have previously fit under these exceptions, §63.6640(f)(4)(i) states that these exceptions only apply prior to May 3, 2014. As a result, the permittee does not operate the engines according to all of the requirements in §63.6640(f)(1) through (4) in order to be considered an emergency engine under MACT ZZZZ. §63.6640(f) states that if the engines do not meet all of the requirements in §63.6640(f)(1) through (4), the engines shall not be considered an emergency engines under MACT ZZZZ and thus must meet all requirements for non-emergency engines.

40 CFR Part 63, Subpart CCCCCC – *National Emission Standards for Hazardous Air Pollutants for Source Category – Gasoline Dispensing Facilities*

This subpart does not apply. This installation does not meet the definition of a gasoline dispensing facility. The installation handles and stores diesel fuel on-site only.

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

40 CFR Part 63, Subpart M – *National Standards for Asbestos*

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.

Greenhouse Gas Emissions

The installation is a minor source of GHGs. There are no currently issued GHG regulations applicable to this installation. Missouri regulations do not require the installation to report CO₂e emissions in their Missouri Emissions Inventory Questionnaire; therefore, the installation's CO₂e emissions were not included within this permit.

Other Regulatory Determinations

10 CSR 10-6.170, *Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin*

While this rule applies, it is unlikely that particulate matter will emit beyond the installation's property line in any significant quantities due to the nature and low particular matter emissions from its emission points. As a result, the monitoring and recordkeeping requirements of this condition have been removed from the Core Permit Requirements.

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

This rule applies. This rule was rescinded from the Missouri Code of State Regulations on November 30, 2015 but is still in the EPA approved SIP and is thus still an applicable federal requirement.

10 CSR 10-6.261, *Control of Sulfur Dioxide Emissions*

This rule applies to EP-09 and has been applied within this permit. Once 10 CSR 10-6.261 is incorporated into the SIP it will become a federal requirement and will no longer be just a State Only requirement. This rule does not apply to engines EP-01 through EP-08 due to being subject to a more restrictive sulfur content limitation. This rule still applies to EP-09 due to this rule having a more stringent sulfur content limit.

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

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

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

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

Response to Public Comments

Comments were received from Mark A. Smith of USEPA Region 7 on July 24, 2017. The comments are addressed in the order in which they appear within the letter.

USEPA Comment #1:

Permit Condition 002 incorporates applicable requirements from 10 CSR 10-6.261 and MDNR notes that "as of the issuance of this permit, 10 CSR 10-6.261 is state enforceable only." However, all permit conditions incorporated into an approved operating permit are and will be enforced by the EPA unless marked as a "State Only Requirement." Therefore, EPA suggests MDNR indicate that Permit Condition 002 is a "State Only Requirement."

MoDNR Response to Comment #1:

MoDNR has updated Permit Condition 002 to state it is a "State Only Requirement."

USEPA Comment #2:

In the Statement of Basis section titled Other Regulatory Determinations, MDNR states that 10 CSR 10-6.260 was rescinded from the Missouri Code of State Regulations and thus has not been included in this operating permit. However, 10 CSR 10-6.260 is still in the EPA approved SIP and is therefore still an applicable requirement that are required to be included in the operating permit. Additionally, in the Other Regulatory Determinations section of the Statement of Basis, MDNR states that "once 10 CSR 10-6.261 is incorporated into the SIP it will become federally enforceable." All requirements incorporated into the Missouri Code of State Regulations and incorporated into the operating permit are "federally enforceable." However, once these requirements are incorporated into the SIP they become federal requirements and not State Only requirements. EPA suggests MDNR consider adding 10 CSR 10-6.260 as an applicable operating permit requirement and also consider modification to the Statement of Basis language.

MoDNR Response to Comment #2:

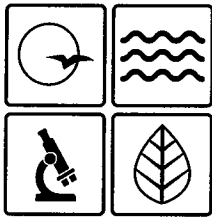
MoDNR has added 10 CSR 10-6.260 into the operating permit as Permit Condition 003 and has made the appropriate modifications to the Statement of Basis.

USEPA Comment #3:

Finally, EPA suggests MDNR consider including a "sunset" provision, regarding 10 CSR 10-6.260 and 10 CSR 10-6.261 to indicate that upon adoption of 10 CSR 10-6.261 into the federally approved SIP replacing the requirements of 10 CSR 10-6.260, the requirements of 10 CSR 10-6.260 will no longer be applicable and the requirements of 10 CSR 10-6.261 will no longer be a "State Only Requirement." This "sunset" provision will preclude the necessity of an extra operating permit revision.

MoDNR Response to Comment #3:

MoDNR has included provisions in Permit Condition 002 and 003 to state that revisions of the operating permit are unnecessary upon the addition of 10 CSR 10-6.261 and removal of 10 CSR 10-6.260 to Missouri's SIP.



Missouri Department of

dnr.mo.gov

NATURAL RESOURCES

Eric R. Greitens, Governor

Carol S. Comer, Director

OCT 23 2017

Mr. Shawn Caley
Unionville Power & Light
P.O. Box 255
Unionville, MO 63565

Re: Unionville Power & Light, 171-0005
Permit Number: OP2017-078

Dear Mr. Caley:

Enclosed with this letter is your intermediate operating permit. Please review this document carefully. Operation of your installation in accordance with the rules and regulations cited in this document is necessary for continued compliance. It is very important that you read and understand the requirements contained in your permit.

This permit may include requirements with which you may not be familiar. If you would like the department to meet with you to discuss how to understand and satisfy the requirements contained in this permit, an appointment referred to as a Compliance Assistance Visit (CAV) can be set up with you. To request a CAV, please contact your local regional office or fill out an online request. The regional office contact information can be found at <http://dnr.mo.gov/regions/>. The online CAV request can be found at <http://dnr.mo.gov/cav/compliance.htm>.

You may appeal this permit to the Administrative Hearing Commission (AHC), P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.078.16 and 621.250.3. If you choose to appeal, you must file a petition with the AHC within thirty (30) days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If you send your appeal by registered or certified mail, we will deem it filed on the date you mailed it. If you send your appeal by a method other than registered or certified mail, we will deem it filed on the date the AHC receives it.

If you have any questions or need additional information regarding this permit, please contact the Air Pollution Control Program (APCP) at (573) 751-4817, or you may write to the Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Michael J. Stansfield, P.E.
Operating Permit Unit Chief

MJS:kwj

Enclosures

c: PAMS File: 2017-05-019



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