



TITLE V 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: OP2009-017
Installation ID: 189-0010
Expiration Date: JUL 12 2014
Project Number: 2008-07-059

Installation Name and Address

AmerenUE – Meramec Plant
8200 Fine Road
St. Louis, Missouri 63129
St. Louis County

Parent Company's Name and Address

Union Electric Company d/b/a AmerenUE
P.O. Box 66149
St. Louis, MO 63166

Installation Description:

AmerenUE – Meramec Plant is a power plant that converts energy from coal and other fuels to electrical energy. The installation has coal unloading, conveying, stockpiles and pulverizing equipment to supply the boilers. Boilers 1-4 are fueled primarily with coal but also burn natural gas for ignition, flame stabilization and supplemental load. All four boilers are equipped with electrostatic precipitators and low NOx burners. Equipment for handling and disposing fly ash generated from the combustion of coal is on site. The facility also uses two combustion turbines to generate electricity when necessary. Both turbines burn No.2 fuel oil, but one burns it only as back-up using natural gas as the primary fuel.

JUL 13 2009

Effective Date

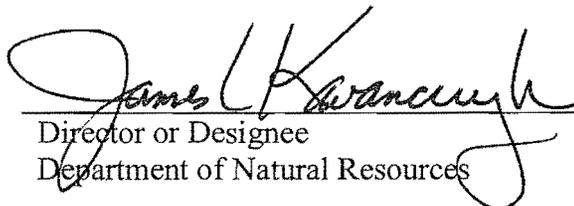

Director or Designee
Department of Natural Resources

Table of Contents

I. INSTALLATION DESCRIPTION AND EQUIPMENT LISTING4

INSTALLATION DESCRIPTION4

EMISSION UNITS WITH LIMITATIONS5

EMISSION UNITS WITHOUT LIMITATIONS.....6

DOCUMENTS INCORPORATED BY REFERENCE.....6

II. PLANT WIDE EMISSION LIMITATIONS.....7

Permit Condition PW0017

 10 CSR 10-5.1207

 Information on Sales of Fuels to be Provided and Maintained7

Permit Condition PW0027

 10 CSR 10-6.1707

 Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin7

Permit Condition PW0038

 10 CSR 10-6.2208

 Restriction of Emission of Visible Air Contaminants.....8

Permit Condition PW00410

 10 CSR 10-6.27010

 Acid Rain Source Permits Required10

Permit Condition PW00511

 10 CSR 10-6.362*11

 Clean Air Interstate Rule Annual NOx Trading Program11

 10 CSR 10-6.364*11

 Clean Air Interstate Rule Seasonal NOx Trading Program.....11

 10 CSR 10-6.366*11

 Clean Air Interstate Rule SOx Trading Program11

III. EMISSION UNIT SPECIFIC EMISSION LIMITATIONS12

EU0010-EU0040—Boilers 1, 2, 3 and 412

Permit Condition EU0010-EU0040-00112

 10 CSR 10-5.03012

 Maximum Allowable Emission of Particulate Matter from Fuel Burning Equipment Used for Indirect Heating12

 40 CFR Part 6412

 Compliance Assurance Monitoring (CAM)*12

Permit Condition EU0010-EU0040-00217

 10 CSR 10-6.26017

 Restriction of Emission of Sulfur Compounds17

EU0050—Emergency Diesel Generator18

Permit Condition EU0050-00118

 10 CSR 10-6.26018

 Restriction of Emission of Sulfur Compounds18

EU0060—Combustion Turbine CT01, CT2A and CT2B19

Permit Condition EU0060-00119

 10 CSR 10-6.26019

 Restriction of Emission of Sulfur Compounds19

Permit Condition EU0060-002.....20

 10 CSR 10-6.06020

 Construction Permits Required.....20

 STLCO APCP Construction Permit #6595.....20

EU0100—Rail Car Unloading Pit; Convey/Transfer/Stack Coal20

Permit Condition EU0100-00121

 10 CSR 10-6.06021

 Construction Permits Required.....21

 STLCO APCP Construction Permit #6620, 662121

EU0130—Parts Washer	21
Permit Condition EU0130-001	21
10 CSR 10-5.300	21
Control of Emissions from Solvent Metal Cleaning	21
EU0140—1,000 Gallon Gasoline Above-Ground Storage Tank	23
Permit Condition EU0140-001	23
10 CSR 10-5.220	23
Control of Petroleum Liquid Storage, Loading and Transfer.....	23
EU0150—Fly Ash Handling System	24
Permit Condition EU0150-001	24
10 CSR 10-6.400	24
Restriction of Emissions of Particulate Matter from Industrial Processes	24
Permit Condition EU0150-002.....	24
10 CSR 10-6.060	24
Construction Permits Required.....	24
STLCO APCP Construction Permit #6743.....	24
IV. CORE PERMIT REQUIREMENTS	25
V. SAINT LOUIS COUNTY AIR POLLUTION CONTROL CODE REQUIREMENTS	30
VI. GENERAL PERMIT REQUIREMENTS.....	33
VII. ATTACHMENTS.....	38
ATTACHMENT A	39
FUGITIVE EMISSION OBSERVATIONS.....	39
ATTACHMENT B	40
VISIBLE EMISSION METHOD 9 OBSERVATION FORM	40
ATTACHMENT C	41
TITLE V: CLEAN AIR INTERSTATE RULE (CAIR) PERMIT.....	41

I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION

AmerenUE – Meramec Plant is a power plant that converts energy from coal and other fuels to electrical energy. The installation has coal unloading, conveying, stockpiles and pulverizing equipment to supply the boilers. Boilers 1-4 are fueled primarily with coal but also burn natural gas for ignition, flame stabilization and supplemental load. All four boilers are equipped with electrostatic precipitators and low NOx burners. Equipment for handling and disposing fly ash generated from the combustion of coal is on site. The facility also uses two combustion turbines to generate electricity when necessary. Both turbines burn No.2 fuel oil, but one burns it only as back-up using natural gas as the primary fuel.

Reported Air Pollutant Emissions, tons per year							
Year	Particulate Matter ≤10 Microns (PM-10)	Sulfur Oxides (SO _x)	Nitrogen Oxides (NO _x)	Volatile Organic Compounds (VOC)	Carbon Monoxide (CO)	Lead (Pb)	Hazardous Air Pollutants (HAPs)*
2007	457.20	22,769.46	5,641.02	110.08	3,987.41	0.74	106.25
2006	442.10	20,662.10	6,887.76	106.06	890.44	0.72	119.52
2005	434.79	18,014.31	8,057.25	108.14	905.79	0.74	72.49
2004	490.62	29,684.85	8,018.03	109.22	915.86	0.70	1,812.5
2003	366.33	15,450.93	10,813.18	93.94	791.96	0.64	1,552.9
2002	337.59	16,447.42	9,451.50	83.73	707.00	0.58	376.2

* There are several reasons for the fluctuation in HAP data in the past 5 years. The chlorine content in the coal changed when Ameren switched coal suppliers. Also, information provided by Electric Power Research Institute (EPRI) replaced the emission factor from AP-42.

EMISSION UNITS WITH LIMITATIONS

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

<u>Emission Unit #</u>	<u>Description of Emission Unit</u>
EU0010	Tangential Pulverized Coal Fired Boiler #1; Combustion Engineering Serial No. 11049 MHDR: 1566 MMBtu/hr, manufactured 08/03/49 Stack S-1 Control Device - Electrostatic Precipitator, Low NOx Burners and Overfire Air
EU0020	Tangential Pulverized Coal Fired Boiler #2 Combustion Engineering Serial No. 1551 MHDR: 1566 MMBtu/hr, manufactured 08/03/49 Stack S-2 Control Device - Electrostatic Precipitator, Low NOx Burners and Overfire Air
EU0030	Front Wall Pulverized Coal Fired Boiler #3 Foster Wheeler Model No. ST-47425 MHDR: 3172 MMBtu/hr, manufactured 07/20/56 Stack S-3 Control Device - Electrostatic Precipitator, Low NOx Burners and Overfire Air
EU0040	Front Wall Pulverized Coal Fired Boiler #4 Foster Wheeler Model No. ST-47983-A MHDR: 3782 MMBtu/hr, manufactured 08/08/58 Stack S-4 Control Device - Electrostatic Precipitator, Low NOx Burners and Overfire Air
EU0050	Emergency Diesel Generator
EU0060	Combustion Turbines CT01, CT2A and CT2B
EU0090	Convey/Transfer/Stack Coal (surge pile only); Enclosure and Water Spray Dust Suppression MHDR: 4,000 ton/hr, 80-90 percent est. efficiency
EU0100	Rail Car Unloading Pit, Coal Water Spray Dust Suppression
EU0130	Parts Washer
EU0140	1000-Gallon Above-Ground Gasoline Storage Tank
EU0150	Fly Ash Handling System 3 filter separators, 2 fly ash storage silos Loading of fly ash from silos to trucks; MHDR: 22.7 tons/hr

EMISSION UNITS WITHOUT LIMITATIONS

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

Description of Emission Source

M-1	Coal Unloading, Barge (EU0080)
M-2	Coal Storage Pile, 6 Acres
TK-1	1,500,000 Gallon Combustion Turbine Fuel Oil Storage Tank
TK-2, 3	10,000 Gallon Transformer Oil Storage Tanks (2)
TK-4	120 Gallon Combustion Turbine Oil Reservoir
TK-5	3,000 Gallon Combustion Turbine Oil Reservoir
TK-6	4,500 Gallon Diesel Fuel Storage Tank
TK-7	6,000 Gallon Diesel Fuel Storage Tank
TK-8	1585 Gallon Diesel Fuel Storage Tank
TK-13	6,000 Gallon Kerosene Storage Tank
TK-14	3,000 Gallon Used Oil Storage Tank
TK-15-17	4,000 Gallon Oil Circuit Breaker Storage Tanks (3)
V-1-4	Lube Oil Reservoir Vapor Extractor Vents (4)
V-5-8	Generator Seal Oil Vapor Extractor Vents (4)
V-9, 10	Generator Seal Oil System Vent-Unit 3 (2)
V-11, 12	Generator Bearing Drain Vapor Extractor Vent-Unit 4 (2)
TK-18	330 Gallon Combustion Turbine Oil Reservoir
TK-19	300 Gallon Fuel Oil Storage Tank
TK-20	300 Gallon Gasoline Storage Tank
TK-21	Portable Gasoline Powered Generators, Oil-fired Torpedo Heaters, Gasoline Powered Pumps, Gasoline Powered Pressure Washers

DOCUMENTS INCORPORATED BY REFERENCE

These documents have been incorporated by reference into this permit.

- 1) March 1, 1996 Letter from Steve Feeler, Chief of Enforcement, Missouri Department of Natural Resources Air Pollution Control Program to Mr. Michael L. Menne, Supervisor, Environmental Services Union Electric Company
- 2) St. Louis County Air Pollution Control Program, Construction Permit 4568, Boiler #3
- 3) St. Louis County Air Pollution Control Program, Construction Permit 6595, Combustion turbine #2
- 4) St. Louis County Air Pollution Control Program, Construction Permit 6620, Rail car unloading pit
- 5) St. Louis County Air Pollution Control Program, Construction Permit 6621, Convey/transfer/stack coal
- 6) St. Louis County Air Pollution Control Program, Construction Permit 6743, Fly ash handling system

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.

Permit Condition PW001
10 CSR 10-5.120 Information on Sales of Fuels to be Provided and Maintained
<i>Emission Limitation/Monitoring:</i> 1. Every delivery of coal when first delivered to a consumer must be accompanied by a ticket prepared in triplicate and containing at least the name and address of the seller and the buyer and the source of the fuel. 2. Tickets on delivery of coal shall also show the ash content of the coal.
<i>Record keeping:</i> Retain fuel receipts for the previous sixty (60) month period and make them available to the St. Louis County Air Pollution Control Program, or its designated agent, at any reasonable time.
<i>Reporting:</i> Report to the St. Louis County Air Pollution Control Program, 74 Clarkson Wilson Ctr., Chesterfield, MO 63017, and the Missouri Department of Natural Resources 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.

Permit Condition PW002
10 CSR 10-6.170 Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin
<i>Emission Limitation:</i> 1. No person may 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 to go beyond the premises of origin in quantities that the particulate matter- a) Remains visible in the ambient air beyond the property line of origin; or b) May be found on surfaces beyond the property line of origin. 2. The nature or origin of the particulate matter shall be determined to a reasonable degree of certainty by a technique proven to be equally accurate and approved by the Director. 3. The staff Director may allow an exemption for unusual and adverse weather conditions for any activity that would otherwise be a violation. These conditions may include, but are not limited to, high winds, extended dry weather periods and extreme cold weather.

Monitoring:

1. To the extent practicable, the permittee shall conduct inspections of the installation sufficient to determine compliance with this regulation. The source representative shall maintain a log noting
1) whether any fugitive particulate matter emissions (except for water vapor) remain visible in the ambient air or on surfaces beyond the property line of origin; 2) if any visible emissions are noted, the duration of the incident, the origin, and the description of the visible emission; and 3) any corrective action(s) taken. If no visible or other significant emissions were observed, then no further observations or action would be required.
2. Weekly observations shall be conducted for a minimum of eight (8) consecutive weeks. Should no violations of this regulation be observed in that time period, observations shall be conducted every other week for a period of two (2) calendar months. Should no violations be observed in this time period, observations shall be conducted once per month. Should violations be observed, then:
 - a) The frequency of periodic monitoring will revert to weekly, and the frequency of monitoring would follow the reduction in frequency of monitoring as just outlined, provided no further violations were observed.
 - b) The permittee will take whatever steps are necessary to bring the installation back in to compliance with this regulation as soon as is practicable.

Record Keeping:

1. Maintain fugitive emission log that includes records of any exceedances of any of the terms imposed by this regulation.
2. Attachment A, or an equivalent record-keeping sheet shall be used to record all information required by this rule.
3. Retain records for the previous sixty (60) month period and make them available to the St. Louis County Air Pollution Control Program, or its designated agent, at any reasonable time.

Reporting:

Report to the St. Louis County Air Pollution Control Program, 74 Clarkson Wilson Ctr., Chesterfield, MO 63017, and the Missouri Department of Natural Resources 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.

Permit Condition PW003

10 CSR 10-6.220

Restriction of Emission of Visible Air Contaminants

Emission Limitation:

1. The permittee shall not discharge into the ambient air from any single source of emission whatsoever any air contaminant with opacity greater than 20 percent.
2. A source with a 20 percent limit may emit air contaminants with an opacity over 20 percent, but not greater than 40 percent for an aggregate length of time not to exceed six (6) minutes in any 60 minutes.
3. Where the presence of uncombined water is the only reason for failure of an emission to meet the requirements, the requirements shall not apply.
4. Coal-fired steam generating units with a maximum heat input rate greater than two hundred fifty (250) million British thermal units (Btus)/hour shall have COMS installed, calibrated, maintained and operated in accordance with 40 CFR 60, Performance Specification I, unless the units have an annual boiler capacity factor of thirty percent (30 percent) or less.

Monitoring:

COMS Operating General Requirements:

COMS EUs:

1. Source operating time includes any time fuel is being combusted and/or a fan is being operated.
2. Cycling times include the total time a monitoring system requires to sample, analyze and record an emission measurement. Continuous monitoring systems for measuring opacity shall complete a minimum of one (1) cycle of operation (sampling, analyzing and data recording) for each successive ten-second period.
3. If COMS is malfunctioning, a non-Departmental (non-regulatory official) qualified observer (Method 9 Certified Observer) measurement may be used as a temporary substitute. Measurements taken by a qualified Department observer shall be used to determine compliance if they differ from the measurements taken by a non-Department qualified observer.

Non-COMS EUs:

1. Conduct visual emission observations of all subject emission units using the procedures contained in U.S. EPA Test Method 22. Readings are only required when the emission unit is operating and when the weather conditions allow. If no visible or other significant emissions are observed using these procedures, then no further observations are required. For emission units where visible emissions are observed, the source representative shall then conduct a Method 9 observation.
2. The following monitoring schedule must be maintained:
 - a) Observations must be made once per month. If a violation is noted, then-
 - b) Weekly observations shall be conducted for a minimum of eight (8) consecutive weeks. Should no violation of this regulation be observed during this period then-
 - c) Observations must be made once every two weeks for a period of eight (8) weeks. If a violation is noted, monitoring reverts to weekly. Should no violation of this regulation be observed during this period then monthly observations shall be resumed.

Record Keeping:

COMS EUs:

1. Maintain a file (hard copy or electronic version) of all information reported in the quarterly summaries (see *Reporting* below); and
2. Maintain a file (hard copy or electronic version) of all six-minute opacity averages and daily Quality Assurance/Quality Control Records.

Non-COMS EUs:

1. Maintain records of all observation results noting whether any air emissions (except for water vapor) were visible from the emission units (Attachment A).
2. Maintain records of any Method 9 test performed in accordance with this permit condition (Attachment B).
3. Maintain records of any equipment malfunctions and corrective actions taken.

All EUs:

1. Retain records for the previous sixty (60) month period and make them available to the St. Louis County Air Pollution Control Program, or its designated agent, at any reasonable time.

Reporting:

COMS EUs

1. Submit quarterly reports to the St. Louis County Air Pollution Control Program. All quarterly reports shall be postmarked no later than 30 days following the end of each calendar quarter and shall include the following emissions data:
 - a) A summary including total time for each cause of excess emissions and/or monitor downtime;
 - b) Nature and cause of excess emissions, if known;
 - c) The six-minute average opacity values greater than the opacity emission requirements;
 - d) The date and time identifying each period during which the COMS was inoperative (except for zero and span checks), including the nature and frequency of system repairs or adjustments that were made during these times; and
 - e) If no excess emissions have occurred during the reporting period and the COMS has not been inoperative, repaired or adjusted, this information shall be stated in the report.
2. Notify St. Louis County Air Pollution Control Program by the next working day of excess opacity when the event duration is equal to a continuous exceedance of one hour or more. This notification may be submitted electronically.

Non-COMS EUs:

1. Report to the St. Louis County Air Pollution Control Program at 74 Clarkson Wilson Ctr., Chesterfield, MO 63017 and the Missouri Department of Natural Resources Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, no later than ten (10) days after the discovery of an exceedance of the opacity limit from a Non-COMS emission unit.

Permit Condition PW004

10 CSR 10-6.270

Acid Rain Source Permits Required

Emission Limitation:

Obtain an Acid Rain Source Permit for affected units pursuant to Title IV of the Clean Air Act. Acid Rain Permit #OP2008-003 has been issued to this installation.

Monitoring/Recordkeeping:

Retain the most current acid rain permit issued to this installation on site and make available to the St. Louis County Air Pollution Control Program, or its designated agent, at any reasonable time.

Reporting:

Report to the St. Louis County Air Pollution Control Program, 74 Clarkson Wilson Ctr., Chesterfield, MO 63017, and the Missouri Department of Natural Resources 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.

Permit Condition PW005

10 CSR 10-6.362*
Clean Air Interstate Rule Annual NOx Trading Program
10 CSR 10-6.364*
Clean Air Interstate Rule Seasonal NOx Trading Program
10 CSR 10-6.366*
Clean Air Interstate Rule SOx Trading Program

Emission Limitation:

1. The permittee shall obtain a CAIR Source Permit for boilers 1, 2, 3 and 4 (EU0010-EU0040) and for combustion turbines 1 and 2 (EU0060).
2. A CAIR Permit (MDNR project 2007-07-038, ORIS Code 2104) is being issued to the permittee in conjunction with this Title V permit. (See Attachment C)

Monitoring/Recordkeeping:

The permittee shall retain the most current CAIR permit issued to this installation on-site and shall immediately make such permit available to any Missouri Department of Natural Resources Air Pollution Control Program or St. Louis County Air Pollution Control Program personnel upon request.

Reporting:

Report any deviations of the monitoring/recordkeeping requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by the General Reporting requirements of this permit.

*Administered and enforced by Missouri Department of Natural Resources

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.

EU0010-EU0040—Boilers 1, 2, 3 and 4	
General Description:	Tangential (1,2) and Front Wall (3,4) Pulverized Coal Fired Boilers*
Manufacturer/Model #:	Combustion Engineering (1,2) and Foster Wheeler (3,4)
EIQ Reference # (2005):	EU001-EU004
STLCO Construction Permit #	4566, 4567, 4568, 4569

***Alternate Operating Scenarios**

Ameren UE Meramec may periodically co-combust small quantities of non-hazardous wastes in the steam-generating units for energy recovery provided these practices do not violate any applicable regulatory requirements. These non-hazardous wastes include, but are not limited to, on specification used oil as defined in 40 CFR 279, oil sorbents used in oil spill cleanup, spent demineralization resin from the water purification system, used ethylene glycol added to the coal supply system as a freeze-conditioning agent, and cleaning wastes from the boiler and heat exchanger feedwater and condenser. In addition, approved paint sludge may be co-combusted as a recovered material. Non-hazardous wastes and approved paint sludge shall be burned in a boiler at or near full load resulting in negligible emissions.

Permit Condition EU0010-EU0040-001
10 CSR 10-5.030 Maximum Allowable Emission of Particulate Matter from Fuel Burning Equipment Used for Indirect Heating 40 CFR Part 64 Compliance Assurance Monitoring (CAM)*
<i>Emission Limitations:</i> <ol style="list-style-type: none"> The permittee shall not emit particulate matter in excess of 0.12 pounds per MMBtu of heat input. Emissions in excess of the level of the emission limits in #1 above during periods of start-up, shutdown, and malfunction may be excused under 10 CSR 10-6.050, <i>Start-up, Shutdown and Malfunction Conditions</i>, provided the Permittee has made this assertion to the St. Louis County Air Pollution Control Program and the Missouri Department of Natural Resources Air Pollution Control Program in accordance with that rule and these agencies agree with that assertion.

Monitoring:

1. The permittee shall install, certify, operate and maintain a certified Continuous Opacity Monitoring System (COMS) with an automated data acquisition and handling system for measuring and recording the opacity of emissions (in percent opacity) discharged to the atmosphere in order to provide a reasonable assurance of the performance of the electrostatic precipitators (ESP). Previously installed and certified monitoring systems that conform to provisions of the Performance Specification for COMS meet the monitoring requirements.
2. The performance requirements for the COMS shall be as specified in Table 1: AmerenUE Meramec Plant – CAM Monitoring Approach.
3. An excursion and its associated averaging time for each emission unit shall be as specified in Table 1: AmerenUE Meramec Plant – CAM Monitoring Approach.
4. Conduct monitoring continuously except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities, in accordance with 40 CFR 64.7(c). Although compliance with the PM emission limitation may be exempted in some circumstances during conditions such as startup, shutdown, and malfunction, Ameren is required to operate and maintain the source in accordance with good air pollution control practices for minimizing emissions during such periods. This requires Ameren to minimize periods of startup, shutdown or malfunction, and take corrective action to restore normal operation and prevent recurrence of the problem that led to the excursion except where the excursion was related to an excused startup, shutdown, or malfunction.
5. Proper Maintenance. At all times, the permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment. (40 CFR 64.7(b)).
6. Continued Operation. Except for monitoring malfunctions, associated repairs, and required quality assurance or control activities (including calibration checks and required zero and span adjustments), the permittee shall conduct all monitoring in continuous operation at all times that Boilers 1, 2, 3 and 4 (EU0010 through EU0040) are operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for data averages and calculations, or fulfilling a minimum data availability requirement. The permittee shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. 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. (40 CFR 64.7(c))
7. The permittee shall follow the following procedure in response to excursions or exceedances:
 - a) Upon detecting an excursion or exceedance, the permittee shall restore operation of Boilers 1, 2, 3 and 4 (EU0010 through EU0040) (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable. (40 CFR 64.7(d)(1))

- b) Determination of whether the permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process. (40 CFR 64.7(d)(2))

Record Keeping:

1. *General Record Keeping Requirements.* The permittee shall comply with the record keeping requirements specified in 40 CFR 70.6(a)(3)(ii). Maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to 40 CFR 64.8 and any activities undertaken to implement a quality improvement plan (QIP), and other supporting information required to be maintained under part 64 (40 CFR Part 64.9(b)(1)). Record keeping requirements of 40 CFR 70.6(a)(3)(ii) include the following:
 - a) The date, place, and time of sampling or measurements;
 - b) The date(s) analyses were performed;
 - c) If applicable, the company or entity that performed the analyses;
 - d) The analytical techniques or methods used;
 - e) The results of such analyses; and
 - f) The operating conditions as existing at the time of sampling or measurement.
2. Maintain records of the following information:
 - a) All information reported in the quarterly summaries including:
 - i) The charts or printouts generated by the COMS, where applicable;
 - ii) An opacity summary report;
 - iii) An excess opacity emission summary;
 - iv) An excess opacity emission summary list;
 - v) An opacity monitoring downtime summary list; and
 - b) All one-hour, and three-hour opacity averages and daily Quality Assurance (QA)/Quality Control (QC) records. This includes, but is not restricted to the daily monitoring system calibration check done on the continuous opacity monitoring system.
3. Records may be kept on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, instead of paper provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable record keeping requirements. (40 CFR 64.9(b)(2))
4. Retain records of all required monitoring data and support information for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all required calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all required reports (including any written Quality Improvement Plan (QIP), if QIP is required).
5. Records shall be made available to the St. Louis County Air Pollution Control Program, or its designated agent, at any reasonable time.

Reporting:

1. **General Reporting Requirements.** Submit semi-annual monitoring certified by a responsible official. The report shall include, at a minimum, the following information, as applicable:
 - a) All instances of deviations from permit requirements must be clearly identified;
 - b) Prompt reporting of deviations from permit requirements, including those attributable to upset conditions as defined in the permit, the probable cause of such deviations, and any corrective actions or preventive measures taken;
 - c) Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken. This shall include all 1-hour and 3-hour block average opacity values greater than the opacity levels specified in Table 1, AmerenUE Meramec Plant - CAM Monitoring Approach for Boilers #1, #2, #3 & #4 contained in this permit;
 - d) Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and
 - e) A description of the actions taken to implement a QIP during the reporting period as specified in 40 CFR 64.8, if a QIP is required. Upon completion of a QIP, the permittee shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.
2. **Performance Testing.**
 - a) Submit operating parameter data obtained during from any applicable compliance or performance tests.
 - b) Submit documentation if any changes to the emission units, including the control device and capture system, have taken place that could result in a significant change in the control system performance or selected indicator ranges since the last performance or compliance test.
3. **Documentation of need for improved monitoring.** If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify St. Louis County Air Pollution Control Program and, if necessary, submit a proposed modification to the Part 70 permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

NOTE:

Compliance Assurance Monitoring (CAM) applies to these units, so this permit condition incorporates parts of 40 CFR Part 64. Where conflicts arise between this Title V Permit, 40 CFR Part 64, and the installation's CAM plan and CAM test plan, the Title V Permit shall take precedence.

Table 1

AmerenUE Meramec Plant - CAM Monitoring Approach for Boilers #1, #2, #3 & #4	
Particulate Matter (PM) Compliance Indicator	
Indicator	Opacity
Measurement Approach	Continuous Opacity Monitoring System (COMS)
Indicator Range	<p>Based on stack test data submitted by the Permittee, the baseline 1-hour average opacity is in the range of 6.3-7.1 percent for boiler #1, 2.4-2.5 percent for boiler #2, 6.7-7.5 percent for boiler #3, and 3.0-3.2 percent for boiler #4.</p> <p>An excursion is defined as a 1-hour block average opacity greater than 22 percent. Excursions trigger an inspection, corrective action, and a reporting requirement.</p> <p>Based on stack test data submitted by the Permittee, a PM exceedance has likely occurred if the 3-hour average stack opacity exceeds 24 percent for boiler #1, 24 percent for boiler #2, 23 percent for boiler #3, and 25 percent for boiler #4.</p>
Performance Criteria	
Data Representativeness	Each boiler discharges to a dedicated stack with no bypass capabilities. Each stack is equipped with a COMS located downstream of the ESP that complies with the applicable version of 40 CFR Part 60, Appendix B, Performance Specification 1 (PS-1).
Verification of Operational Status	Not applicable since the selected monitoring approach utilizes existing COMS that were initially installed and evaluated per the applicable version of PS-1.
QA/QC Practices and Criteria	Perform a daily zero and calibration drift check, periodic cleaning of optical surfaces and other periodic QA/QC checks as specified in applicable version of PS-1.
Monitoring Frequency	Continuous [i.e., the COMS is to complete a minimum of one cycle (i.e., sampling, analyzing, and data recording) for each successive 10-second period].
Data Collection Procedure	
Averaging Period	The data acquisition system is to reduce the 10-second data points to 6-minute, 1-hour, and 3-hour block averages.
Reporting	Summary information on the number, duration, and cause for any excursions and COMS downtime will be reported on a semiannual basis.

Permit Condition EU0010-EU0040-002

10 CSR 10-6.260

Restriction of Emission of Sulfur Compounds

Emission Limitation:

1. No person shall cause or permit the emission of sulfur dioxide (SO₂) to the atmosphere from any indirect heating source with a capacity of two thousand MMBTUs per hour in an amount greater than 2.3 pounds of SO₂ per MMBTU of actual heat input averaged on any consecutive three hour time period. Each source subject to this emission limit may emit SO₂ at a rate not to exceed the allowable emission rate by more than 20 percent for not more than three days in any one month.
2. No person shall cause or permit the emission of sulfur compounds from any source that causes or contributes to concentrations exceeding those specified in 10 CSR 10-6.010 Ambient Air Quality Standards.

Monitoring:

1. Install, maintain, and operate a continuous emission monitoring system for measuring the SO₂ emission rate (#SO₂/MMBtu) in accordance with 40 CFR Part 75 and 40 CFR Part 60, Appendix A, Method 19.
2. Comply with the quality assurance requirements in 40 CFR Part 75, Appendix B.
3. Conduct, on the frequency required in Part 75, Appendix B, a Relative Accuracy Test Audit on the continuous emission monitoring system, pursuant to 40 CFR Part 75, in 40 CFR Part 60, Appendix A, using Reference Method 6c for SO₂, or equivalent EPA approved method.
4. For a complete list of all testing and quality assurance measures required, review 40 CFR Part 75 and 40 CFR Part 60.

Record keeping:

1. Maintain hourly records of the SO₂ emission rate (#SO₂/MMBtu) in accordance with 40 CFR Part 75 and 40 CFR Part 60, Appendix A, Method 19.
2. Retain records for the previous sixty (60) month period and make them available to the St. Louis County Air Pollution Control Program, or its designated agent, at any reasonable time.

Reporting:

1. Report to the St. Louis County Air Pollution Control Program, 74 Clarkson Wilson Ctr., Chesterfield, MO 63017, and the Missouri Department of Natural Resources Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after any exceedance or non-compliance with 10 CSR 10-6.260. The report shall include exceedance(s) date; duration of how long the emission unit was out of the limitations set forth in this rule, and any corrective and /or preventive action taken.
2. The following shall be submitted in quarterly reports:
 - a) Exceedances of the sulfur dioxide limitations set forth in this rule recorded by the monitoring system. If any exceedances were recorded, give the day, length of time the emission unit was out of compliance, and a data summary of the exceedance (the data summary shall consist of the magnitude in actual pounds of SO₂ per MMBtu actual heat input averaged over three consecutive hours). Additionally, the report shall give a detailed explanation of why the plant exceeded (nature and cause) and corrective action taken to bring the emission unit back into compliance.
 - b) Report when the monitoring system is down due to inoperative periods, repairs, malfunctions or monitor adjustments. The report shall give a reason why the monitor was down, the duration of the downtime event, and provide the percent of the total operating period the monitor experienced downtime. The report shall distinguish between those downtime events that were due to Quality Assurance activities and those events that occurred for other reasons.

- c) If no excess emissions occurred within the quarter and the continuous SO₂ monitoring system has not been inoperative, repaired, or adjusted, that information shall be included in the report.
3. Quarterly reports shall be postmarked by the 30th day following the end of each calendar quarter.

EU0050—Emergency Diesel Generator	
General Description:	15.3 MMBTU/hr Emergency Diesel Generator
Manufacturer/Model #:	Cummins, Inc., Model No. QSK60-G6, Installed 12/04
EIQ Reference # (2005):	EU0050
STLCO Construction Permit #	N/A

Permit Condition EU0050-001	
10 CSR 10-6.260 Restriction of Emission of Sulfur Compounds	
<i>Emission Limitation:</i>	
<ol style="list-style-type: none"> 1. Emissions from any new source operation shall not contain more than five hundred parts per million by volume (500 ppmv) of SO₂ 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 hour time period. 2. No person shall cause or permit the emission of sulfur compounds from any source that causes or contributes to concentrations exceeding those specified in 10 CSR 10-6.010 Ambient Air Quality Standards. 3. The emission unit shall be limited to burning fuel with a sulfur content of no more than 0.5 percent weight sulfur to ensure the facility stays below the 2.3 lbs of SO₂ per MMBtu of actual heat input limit (10 CSR 10-6.260(C)3.A.(I)) 	
<i>Monitoring/Record keeping:</i>	
<ol style="list-style-type: none"> 1. Maintain records of the fuel type used verifying sulfur content less than 0.5 percent by weight. 2. The fuel oils known to be less than 0.5 percent by weight sulfur per Chapter 414 RSMo, Section 414.032, ASTM D396 – Table 1 and ASTM D975 – Table 1, are fuel oil no. 1 and no. 2 and diesel fuel oil Grade Low Sulfur No. 1-D, Grade Low Sulfur No. 2-D. 3. Purchase receipts, analyzed samples, or certifications that verify the fuel type as a grade level with sulfur content less than 0.5 percent by weight will be acceptable. If this cannot be accomplished then compliance with the emission limitations shall be determined by source testing as specified in 10 CSR 10-6.030(6). 4. Other methods approved by the Director in advance may be used. 5. Retain records for the previous sixty (60) month period and make them available to the St. Louis County Air Pollution Control Program, or its designated agent, at any reasonable time. 	
<i>Reporting:</i>	
Report to the St. Louis County Air Pollution Control Program , 74 Clarkson Wilson Ctr., Chesterfield, MO 63017, and the Missouri Department of Natural Resources Air Pollution Control Program’s Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than 10 days after any exceedance of 10 CSR 10-6.260.	

EU0060—Combustion Turbine CT01, CT2A and CT2B	
General Description:	891 MMBTU/hr and 927 MMBTU/hr Combustion Turbines
Manufacturer/Model #:	General Electric, Model No. MS7001, DOM 11/72 and Turbo Power & Marine, a subsidiary of Pratt & Whitney, Model No. FT4-C1D, DOM 1974
EIQ Reference # (2005):	EU006
STLCO Construction Permit #	4341, 6595

Permit Condition EU0060-001	
10 CSR 10-6.260 Restriction of Emission of Sulfur Compounds	
<i>Emission Limitation:</i>	
<ol style="list-style-type: none"> 1. Emissions from any new source operation shall not contain more than five hundred parts per million by volume (500 ppmv) of SO₂ 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 hour time period. 2. No person shall cause or permit the emission of sulfur compounds from any source that causes or contributes to concentrations exceeding those specified in 10 CSR 10-6.010 Ambient Air Quality Standards. 3. The emission unit shall be limited to burning fuel with a sulfur content of no more than 0.5 percent weight sulfur (construction permit #6595). 	
<i>Monitoring/Record keeping:</i>	
<ol style="list-style-type: none"> 1. Maintain records of the fuel type used verifying sulfur content less than 0.5 percent by weight. 2. The fuel oils known to be less than 0.5 percent by weight sulfur per Chapter 414 RSMo, Section 414.032, ASTM D396 – Table 1 and ASTM D975 – Table 1, are fuel oil no. 1 and no. 2 and diesel fuel oil Grade Low Sulfur No. 1-D, Grade Low Sulfur No. 2-D. 3. Purchase receipts, analyzed samples, or certifications that verify the fuel type as a grade level with sulfur content less than 0.5 percent by weight will be acceptable. If this cannot be accomplished then compliance with the emission limitations shall be determined by source testing as specified in 10 CSR 10-6.030(6). 4. Other methods approved by the staff Director in advance may be used. 5. Retain records for the previous sixty (60) month period and make them available to the St. Louis County Air Pollution Control Program, or its designated agent, at any reasonable time. 	
<i>Reporting:</i>	
Report to the St. Louis County Air Pollution Control Program, 74 Clarkson Wilson Ctr., Chesterfield, MO 63017, and the Missouri Department of Natural Resources Air Pollution Control Program’s Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than 10 days after any exceedance of 10 CSR 10-6.260.	

Permit Condition EU0060-002	
10 CSR 10-6.060 Construction Permits Required St. Louis County Air Pollution Control Program Construction Permit #6595	
<i>Emission Limitation:</i> 1. Combustion turbine #2 (Pratt & Whitney turbine) is limited to the burning of natural gas and number two (#2) fuel oil. The sulfur content of the #2 oil shall be five tenths (0.5) of one percent or less by weight (for monitoring and record keeping provisions, refer to EU0060-01). 2. The emission of nitrogen oxides (NO _x) and sulfur dioxide (SO ₂) for combustion turbine #2 is limited to forty (40) tons per year on a twelve (12) month rolling total.	
<i>Monitoring/Record Keeping:</i> 1. Maintain monthly fuel usage records for natural gas and #2 oil burned by the combustion turbine, include the BTU content of each fuel and the sulfur content of the #2 oil. These records shall be used to calculate the monthly emissions of NO _x and SO ₂ utilizing emission factors obtained by testing or AP-42 for NO _x (0.248 lb/MMBTU (gas) and 0.364 lb/MMBTU (oil)) and for SO ₂ (.0006 lb/MMBTU (gas) and 0.362 lb/MMBTU (oil)). These calculated NO _x and SO ₂ emissions shall be added to the previous eleven (11) months of calculated emission records, required under this condition, to determine compliance with limits of emission limitation #2 on a twelve (12) month rolling total. 2. These records and calculations shall be completed within ten (10) days of the end of each calendar month, 3. Retain records for the previous sixty (60) month period and make them available to the St. Louis County Air Pollution Control Program, or its designated agent, at any reasonable time.	
<i>Reporting:</i> 1. Should the records and calculations indicate that a violation of emission limitation #2 has occurred, AmerenUE shall notify the St. Louis County Air Pollution Control Program by no later than the next working day. 2. Report to the St. Louis County Air Pollution Control Program, 74 Clarkson Wilson Ctr., Chesterfield, MO 63017, and the Missouri Department of Natural Resources Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than 10 days after any exceedance of these permit conditions.	

EU0100—Rail Car Unloading Pit; Convey/Transfer/Stack Coal	
General Description:	Rail Car Unloading Pit, Coal; Water Spray Dust Suppression Convey/Transfer/Stack Coal; Enclosure and Water Spray MHDR: 4,000 ton/hr, 80-90 percent est. efficiency
Manufacturer/Model #:	N/A
IEQ Reference # (2005):	EU007-EU011
STLCO Construction Permit #	6620, 6621

Permit Condition EU0100-001	
10 CSR 10-6.060 Construction Permits Required St. Louis County Air Pollution Control Program Construction Permit #6620, 6621	
<i>Emission Limitation:</i> The dust suppression system shall be operated whenever coal is being processed.	
<i>Monitoring/Record Keeping/Reporting:</i> Report to the St. Louis County Air Pollution Control Program, 74 Clarkson Wilson Ctr., Chesterfield, MO 63017, and the Missouri Department of Natural Resources Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than 10 days after any exceedance of this permit condition.	

EU0130—Parts Washer	
General Description:	Parts Washer, 36" x 53" x 20"
Manufacturer/Model #:	N/A
EIQ Reference # (2005):	N/A
STLCO Construction Permit #	7261

Permit Condition EU0130-001	
10 CSR 10-5.300 Control of Emissions from Solvent Metal Cleaning	
<i>Emission Limitation:</i>	
1. Equipment specifications (Section (3)(A)1 Cold Cleaners): <ol style="list-style-type: none"> a) The cold cleaning solvent vapor pressure shall not exceed 1.0 millimeters of Mercury (mmHg) at twenty degrees Celsius (20°C) (sixty-eight degrees Fahrenheit (68°F)). [Per 10 CSR 10-5.300(1)(D)2.B., cold cleaners using solvents regulated under any federal NESHAP shall be exempt from the solvent vapor pressure requirement]. b) Each cold cleaner will have a cover, which will prevent the escape of solvent vapors while in the closed position, or enclosed reservoir, which will limit the escape of solvent vapors whenever parts are not being processed in the cleaner. c) Exemptions under (1)(D) of the regulation may apply. d) Alternate methods for reducing cold cleaning emissions may be used if the permittee shows the emission control is at least equivalent to the control in (a) above and is approved by the Director. e) When one (1) or more of the following conditions exist the design of the cover shall be such that it can easily be operated with one (1) hand and without disturbing the solvent vapors in the tank. (For covers larger than ten (10) square feet, this shall be accomplished by either mechanical assistance or by a power system). <ol style="list-style-type: none"> i) The solvent volatility is greater than 0.3 psi at one hundred degrees Fahrenheit (100°F) ii) The solvent is agitated. iii) The solvent is heated. f) A drainage facility allowing parts to drain while the cover is closed is required. g) If an internal drainage facility as in (f) cannot fit into the cleaning system and the solvent volatility is less than 0.6 psi at one hundred degrees Fahrenheit (100°F), then the cold cleaner shall have an external drainage facility which provides for the solvent to drain back into the solvent bath. h) Solvent sprays shall be a solid fluid stream and at a pressure which does not cause splashing above or beyond the freeboard. 	

- i) A permanent conspicuous label summarizing the operating procedures shall be affixed to the equipment or in a location readily visible during operation of the equipment.
 - j) Any cold cleaner which uses a solvent that has a solvent volatility greater than 0.6 psi at one hundred degrees Fahrenheit (100° F) or heated above one hundred twenty degrees Fahrenheit (120° F) must have one (1) of the following control devices:
 - i) A freeboard ratio of at least 0.75;
 - ii) Water cover (solvent must be insoluble in and heavier than water);
 - iii) Another control system that has a mass balance demonstrated emission reduction efficiency of at least sixty-five percent (65 %) and is approved by the Director prior to use.
2. Operating procedures (Section (3)(B)1 Cold Cleaners):
- a) Covers shall be closed whenever parts are not being handled in the cleaners, or solvent must drain into an enclosed reservoir.
 - b) Cleaned parts shall be drained in the free board area for fifteen (15) seconds, or until dripping stops, whichever is longer.
 - c) Whenever a cold cleaner fails to perform within the operating parameters established by this rule, the unit shall be shut down and secured until trained service personnel are able to restore operation within the established parameters.
 - d) Solvent leaks shall be repaired immediately, or the degreaser shall be shut down and the leaks secured until they can be more permanently repaired.
 - e) Waste material removed from a cold cleaner shall be disposed of by one of the methods listed in the rule or equivalent (after the Director's approval) and in accordance with 10 CSR 25, as applicable.
 - f) Waste solvent shall be stored in closed containers only.
3. Operator and Supervisor Training (Section (3)(C)):
- a) Persons who operate a cold cleaner shall be trained in the operational and equipment requirements specified in this rule.
 - b) The supervisor of any person who operates a cold cleaner shall receive equal or greater operational training than the operator.
 - c) Persons who operate a cold cleaner shall receive a procedural review at least once each twelve (12) months.

Monitoring/Record keeping:

1. Monthly records of the following shall be maintained:
 - a) Types and amounts of solvent containing waste material from cleaning or degreasing operations:
 - i) Transferred to a contract reclamation service or disposal facility
 - ii) Distilled on the premises
 - b) Maintenance and repair logs for the cold cleaner and any associated control equipment.
2. For cold cleaners subject to (3)(A)1 (a) or (b) the following records for each purchase of cold cleaning solvent shall be maintained:
 - a) The name and address of the solvent supplier;
 - b) The date of purchase;
 - c) The type of solvent; and
 - d) The vapor pressure of the solvent in mmHg at 20° C (68° F)
3. Keep a record of the cold cleaner training for each employee.
4. Retain records for the previous sixty (60) month period and make them available to the St. Louis County Air Pollution Control Program, or its designated agent, at any reasonable time.

Reporting:

Report to the St. Louis County Air Pollution Control Program at 74 Clarkson Wilson Ctr., Chesterfield, MO 63017, and the Missouri Department of Natural Resources Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, no later than thirty (10) days after the discovery of any exceedance of the cold cleaner requirements established in 10 CSR 10-5.300.

EU0140—1,000 Gallon Gasoline Above-Ground Storage Tank

General Description:	1000-Gallon Aboveground Gasoline Storage Tank with Associated Dispensing Equipment
Manufacturer/Model #:	1000-Gallon Tank, DOM 1998
EQ Reference # (2005):	N/A
STLCO Construction Permit #	Station ID#2178; Permit #10892

Permit Condition EU0140-001

10 CSR 10-5.220

Control of Petroleum Liquid Storage, Loading and Transfer

Emission Limitation:

The permittee shall not permit the transfer of gasoline from a delivery vessel into a gasoline storage tank with a capacity greater than five-hundred (500) gallons unless:

1. The storage tank is equipped with a submerged fill pipe extending unrestricted to within 6 inches of the bottom of the tank, and not touching the bottom of the tank, or the storage tank is equipped with a system that allows a bottom fill condition;
2. All storage tank caps and fittings are vapor-tight when gasoline transferred is not taking place; and
3. Each storage tank is vented via a conduit that has at least a 2 inch inside diameter, is at least 12 feet high above grade and is equipped with a pressure/vacuum valve that is CARB certified at least 3 inches water column pressure per 8 inches water column vacuum (3" wcp/8" wcv) unless the system is CARB certified for a different valve and will not function properly with a 3" wcp/8" wcv valve.

Monitoring/Record keeping:

1. Keep records documenting the vessel owners and number of delivery vessels unloaded by each owner.
2. Keep on-site copies of the loading ticket, manifest or delivery receipt for each grade of product received.
3. If a delivery receipt is retained rather than a manifest or loading ticket, the delivery ticket shall bear the vendor name, date of delivery, quantity of each grade, point of origin and the manifest or loading ticket number.
4. Retain records for the previous sixty (60) month period and make them available to the St. Louis County Air Pollution Control Program, or its designated agent, at any reasonable time.

Reporting:

Report to the St. Louis County Air Pollution Control Program, 74 Clarkson Wilson Ctr., Chesterfield, MO 63017, and the Missouri Department of Natural Resources Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after any violation of any of the terms imposed by this regulation.

EU0150—Fly Ash Handling System	
General Description:	Pneumatic conveying of fly ash from the electrostatic precipitator hoppers to three filter separators and two fly ash storage silos. Loading of fly ash from fly ash silos to trucks.
Manufacturer/Model #:	Engineering Construction Solutions
EQ Reference # (2005):	N/A
STLCO Construction Permit #	6743

Permit Condition EU0150-001
10 CSR 10-6.400 Restriction of Emissions of Particulate Matter from Industrial Processes
<i>Emission Limitation:</i> Particulate matter shall not be emitted from this emission unit in excess of that allowed by the formula: $PM \text{ lb/hr} = 4.10P^{0.67}$, where P is the process weight in tons/hr. The limit is 99.63 lbs/hr.
<i>Monitoring/Record Keeping:</i> Keep records of one-time calculation demonstrating compliance on-site (see Calculations section).
<i>Reporting:</i> Report to the St. Louis County Air Pollution Control Program, 74 Clarkson Wilson Ctr., Chesterfield, MO 63017, and the Missouri Department of Natural Resources Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than 10 days after any exceedance of 10 CSR 10-6.400.

Permit Condition EU0150-002
10 CSR 10-6.060 Construction Permits Required St. Louis County Air Pollution Control Program Construction Permit #6743
<i>Emission Limitation:</i> 1. The Fly Ash Handling System shall not be operated unless the control devices on the filter separators, silos and truck loading are also in operation 2. All control devices on the Fly Ash Handling System shall be maintained in accordance with the manufacturer's design specifications. Should any control device fail to meet the prescribed specifications; the associated equipment shall be shut down until such time as the necessary repairs are completed.
<i>Monitoring/Record Keeping:</i> Maintain records of any maintenance performed on the emission unit.
<i>Reporting:</i> Report to the St. Louis County Air Pollution Control Program, 74 Clarkson Wilson Ctr., Chesterfield, MO 63017, and the Missouri Department of Natural Resources Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than 10 days after any exceedance of these permit conditions.

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 as of the date that this permit is issued.

10 CSR 10-6.045 Open Burning Restrictions

The open burning of tires, petroleum-based products, asbestos containing materials, trade waste, refuse and vegetative debris is prohibited.

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 10 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(5)(B)1.A(III)] The permittee shall retain the most current operating permit issued to this installation on-site. [10 CSR 10-6.065, §(5)(C)(1) and §(6)(C)1.C(II)] The permittee shall immediately make such permit available to any St. Louis County Air Pollution Control Program or Missouri Department of Natural Resources' personnel upon request. [10 CSR 10-6.065, §(5)(C)(1) and §(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 10-6.100 Alternate Emission Limits

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

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

- 1) The permittee shall complete and submit an Emission Inventory Questionnaire (EIQ) in accordance with the requirements outlined in this rule.
- 2) 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.
- 3) The fees shall be due on the date specified by 10 CSR 10-6.110(3)(D)F each year for emissions produced during the previous calendar year. The fees shall be payable to the Department of Natural Resources and shall be accompanied by the Emissions Inventory Questionnaire (EIQ) form or equivalent approved by the Director.

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 10-6.180 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. Qualified personnel shall perform all tests.
- 2) The Director may conduct tests of emissions of air contaminants from any source. Upon request of the Director, the person responsible for the source to be tested shall provide necessary ports in stacks or ducts and other safe and proper sampling and testing facilities, exclusive of instruments and sensing devices as may be necessary for proper determination of the emission of air contaminants.
- 3) The Director shall be given a copy of the test results in writing and signed by the person responsible for the tests.

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

The permittee shall conduct all asbestos abatement projects within the procedures established for certification and accreditation by 10 CSR 10-6.250. This rule requires individuals who work in asbestos abatement projects to be certified by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires training providers who offer training for asbestos abatement occupations to be accredited by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires persons who hold exemption status from certain requirements of this rule to allow the Department to monitor training provided to employees. Each individual who works in asbestos abatement projects must first obtain certification for the appropriate occupation from the Department. Each person who offers training for asbestos abatement occupations must first obtain accreditation from the Department. Certain business entities that meet the requirements for state-approved exemption status must allow the Department to monitor training classes provided to employees who perform asbestos abatement.

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.

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

It shall be unlawful to operate any hand-fired fuel-burning equipment in the Saint Louis, Missouri metropolitan area. This regulation shall apply to all fuel-burning equipment including, but not limited to, furnaces, heating and cooking stoves and hot water furnaces. It shall not apply to wood-burning fireplaces and wood-burning stoves in dwellings, or to fires used for recreational purpose, nor to fires used solely for the preparation of food by barbecuing. Hand-fired fuel-burning equipment is any stove, furnace, or other fuel-burning device in which fuel is manually introduced directly into the combustion chamber.

10 CSR 10-5.160 Control of Odors in the Ambient Air

No person shall emit odorous matter as to cause an objectionable odor on or adjacent to:

- 1) Residential, recreational, institutional, retail sales, hotel or educational premises.
- 2) Industrial premises when air containing odorous matter is diluted with twenty (20) or more volumes of odor free air; or
- 3) Premises other than those in paragraphs (1)A.1. and 2. of the rule when air containing odorous matter is diluted with four (4) or more volumes of odor free air.

The previously mentioned requirement shall apply only to objectionable odors. An odor will be deemed objectionable when thirty percent (30 %) or more of a sample of the people exposed to it believe it to be objectionable in usual places of occupancy; the sample size to be at least twenty (20) people or seventy-five percent (75 %) of those exposed if fewer than twenty (20) people are exposed.

10 CSR 10-5.450 Coating of VOC Emissions from Traffic Coatings

- 1) No person shall supply, sell, offer for sale, apply, or solicit the application of any traffic coating, which at the time of sale or manufacture contains more than 1.26 pounds VOC per gallon, excluding water, exempt compounds, and any colorant added to tint bases, or manufacture, blend, or repackage such a coating for use within the Saint Louis metropolitan area without the approval of the staff Director.
- 2) All VOC-containing materials shall be stored in closed containers when not in use. In use includes, but is not limited to, being accessed, filled, emptied, or repaired.

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*

V. Saint Louis County Air Pollution Control Code Requirements

The following requirements are not federally enforceable and are only enforced by the St. Louis County Air Pollution Control Program.

Section 612.040, Air Quality Standards and Air Pollution Control Regulations

Saint Louis County Air Pollution Control Program may enforce Missouri Code of State Regulations as adopted and promulgated by the Air Conservation Commission of the State of Missouri consisting of Title 10, Division 10, Chapter 5 and 6.

Section 612.100, Emergency Abatement of Violation

By written approval of the County Executive, any facility indirectly or directly discharging any air contaminant in violation of the Saint Louis County Air Pollution Control Code where it is the opinion of the Director that the discharge creates an emergency which requires immediate action to protect the public health, shall order the person in writing to discontinue immediately.

Section 612.110, Permits Required

The permittee shall obtain St. Louis County Air Pollution Control Program operating permits for its installation. The permittee shall not commence construction, modification, or major modification of any installation subject to this rule without obtaining a permit from St. Louis County Air Pollution Control Program.

Section 612.120, Permits to be Visibly Affixed or Placed

The permittee shall visibly affix St. Louis County Air Pollution Control Program Permit on or near permitted equipment.

Section 612.200, Testing Prior to Granting of Operating Permit

- (1) *Emission Standards:* Before an authority to construct or permit to operate is granted, the Director may require the applicant to conduct tests to determine the kind or amount of the air contaminant emitted from the equipment. Such tests shall be conducted, reviewed and certified by a licensed engineer. The permittee shall notify the County of the time and place of testing for the purpose of witnessing the test.
- (2) *Record Keeping Requirements:* Records shall be kept during testing as approved in a test protocol submitted to the County prior to testing.
- (3) *Monitoring Requirements:* Monitoring during testing shall be as approved in a test protocol submitted to the County prior to testing.
- (4) *Reporting Requirements:* The permittee shall report to the St. Louis County Air Pollution Control Program, 74 Clarkson Wilson Ctr., Chesterfield, MO 63017, no later than ten (10) days after any exceedance of any of the terms imposed by this regulation, or any condition which could possibly cause an exceedance of this regulation.

Section 612.220, Suspension or Revocation of Permits

The Director may suspend or revoke a permit to operate or authority to construct for willful or continued violation of the Saint Louis County Air Pollution Control Code

Section 612.250 Fees, When Payable, Exceptions

Fees for authority to construct and operating permits in the amounts provided in Section 612.260 shall be paid to the Director except as provided in subsections 3 and 4 of this rule.

Section 612.260, Schedules

The permittee shall pay St. Louis County Air Pollution Control Program Construction Permit fees when applicable and annual Operating Permit fees in accordance with the rule.

Section 612.280, Testing by Order of the Board

- (1) *Emission Standards:* If any article, machine, equipment or other contrivance is in violation of the Saint Louis County Air Pollution Control Code, the Director may file with the Board for its approval an order directing the permittee of such equipment to conduct such tests as are necessary in the opinion of the Director and approved by the Board to determine whether the equipment is in violation of this Code.
- (2) *Monitoring/Record Keeping Requirements:* The entire test results shall be reviewed and certified by an engineer licensed under Chapter 327, RSMo 1959. The engineer shall be selected by the permittee and approved by the Board.
- (3) *Reporting Requirements:* The permittee shall give at least seven (7) days notice prior to the commencement of the test. The permittee shall report to the Saint Louis County Air Pollution Control Program, 74 Clarkson Wilson Ctr., Chesterfield, MO 63017.

Section 612.290, Right of Entry; Inspections; Samples

The permittee shall allow the Director or His agent to enter at all times with reasonable notice, inspect any equipment, control apparatus, fuel, matter or things which affect or may affect the emission of air contaminants, inspect any records relating to the use of any equipment or control apparatus which affect or may affect the emission of air contaminants, and sample any equipment, control apparatus, fuel, matter or things which affect or may affect the emission of air contaminants.

Section 612.310, Upset Conditions, Breakdown or Scheduled Maintenance

The permittee shall report to the St. Louis County Air Pollution Control Program, 74 Clarkson Wilson Ctr., Chesterfield, MO 63017, within 24 hours of occurrence of any unavoidable upset in or breakdown of equipment and in case of shutdown for necessary scheduled maintenance, the intent to be shutdown shall be reported to the St. Louis County Air Pollution Control Program 24 hours prior to shutdown.

Section 612.340, Air Pollution Nuisances Prohibited

It is unlawful for the permittee to cause of such quantities of soot, cinders, noxious acids, fumes and gases or other particulate matter from whatever source in such place or matter as to be detrimental to any person or the public or to endanger the health, comfort and safety of any person or the public, injury or damage to property or business.

Section 612.380, Interfering with or Obstructing Division Personnel

No person shall hinder, resist, interfere with or obstruct the Director or any Division employee in carrying out any duty for the Director or the Board.

Section 612.530, Saint Louis County Department of Health Asbestos Abatement Rules and Regulations—Registration, Notification and Performance Requirements

The permittee shall conduct all asbestos abatement projects within the procedures and requirements established in 612.530.

VI. General Permit Requirements

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

10 CSR 10-6.065, §(5)(C)1 and §(6)(C)1.B Permit Duration

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, §(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 St. Louis County Air Pollution Control Program or MDNR personnel upon request.
- 2) Reporting
 - a) Semi-annual Monitoring Reports
 - i) The permittee shall submit a semi-annual report of all required monitoring by:
 1. October 1st for monitoring which covers January through June time period, and
 2. April 1st for monitoring which covers July through December time period.
 - ii) Each semi-annual monitoring report must identify any deviations from permit requirements since the previous report that have been monitored by the monitoring systems required under the permit, and any deviation from the monitoring, record keeping and reporting requirements of the permit.
 - iii) These reports shall be submitted to the St. Louis County Air Pollution Control Program, 74 Clarkson Wilson Ctr., Chesterfield, MO 63017 and the Missouri Department of Natural Resources Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102.
 - b) Annual Compliance Certification
 - i) The permittee shall submit an annual report of all required monitoring by:
April 1st for monitoring which covers the January through December time period.
 - ii) These reports shall be submitted to the St. Louis County Air Pollution Control Program, 74 Clarkson Wilson Ctr., Chesterfield, MO 63017, Missouri Department of Natural Resources Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, and EPA Region 7 Missouri Air Compliance Coordinator, 901 N. 5th Street, Kansas City, KS 66101.
 - c) Supplemental Reports
 - i) 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.
 - ii) 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 (2) 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.

- iii) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.
- iv) 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.
- d) 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.
- e) 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)

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, §(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, §(5)(C)3, §(6)(C)3.B, 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 permitting agency to perform the following (subject to the installation's right to seek confidential treatment of information submitted to, or obtained by, the permitting authority under this subsection):
 - 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. 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 determining 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

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:

- 1) 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.
- 2) The permittee must provide written notice of the change to the St. Louis County Air Pollution Control Program, 74 Clarkson Wilson Ctr., Chesterfield, MO 63017,, as well as EPA Region VII, 901 North 5th Street, Kansas City, Kansas 66101, no later than the next annual emissions report. 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
- 3) 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)12 Responsible Official

Timothy Lafser, Meramec Plant Manager was established as the responsible official for AmerenUE-Meramec in the Part 70 Operating Permit Renewal Application, signed on May 20, 2008. The following employees were also established as responsible officials for this facility in the Permit Renewal Application (Attachment 1): Mark C. Birk – Vice President – Power Operations, Daniel F. Cole –

Senior Vice President Ameren Services, and Michael L. Menne – Vice President Environmental, Safety and Health. 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 St. Louis County 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 St. Louis County Air Pollution Control Program, the Missouri Department of Natural Resources 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) St. Louis County Air Pollution Control Program, Missouri Department of Natural Resources 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 draft 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.

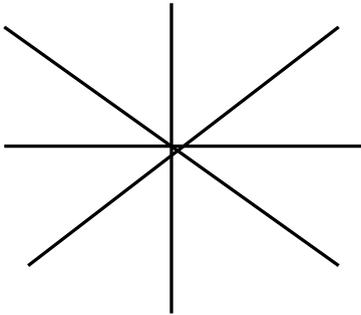
VII. Attachments

Attachment B
Visible Emission Method 9 Observation Form

This worksheet may be used to meet the record keeping requirements for Permit Condition PW001.

Source Name _____
 Address _____
 Observation Point _____
 Stack Identification _____
 Stack: Distance from _____ Height _____
 Temp _____ %RH _____
 Sky Condition _____
 Color of Emission _____

Quadrant: Draw symbols below in appropriate place to mark wind direction and speed, observer's location and sun location.



(Stack is at center)

Observer _____
 Observer's
 Signature _____
 Date _____ Certification Date _____
 Observer Began _____ Ended _____

COMMENTS:

	0	15	30	45		0	15	30	45
0					41				
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Attachment C

TITLE V: CLEAN AIR INTERSTATE RULE (CAIR) PERMIT

In accordance with Title V of the Clean Air Act and Missouri State Rules 10 CSR 10-6.362, *Clean Air Interstate Rule Annual NOx Trading Program*, 10 CSR 10-6.364 *Clean Air Interstate Rule Seasonal NOx Trading Program*, and 10 CSR 10-6.366, *Clean Air Interstate Rule SOx Trading Program*, the State of Missouri issues this CAIR Permit.

Installation Name: Ameren – Meramec, **ORIS Code:** 2104
Unit IDs: EU0010, EU0020, EU0030, EU0040, and EU0060
Expiration Date : July 12, 2014

The permit application submitted for this source, as corrected by the State of Missouri Department of Natural Resources' Air Pollution Control Program, Operating Permit Section, is attached. The owners and operators of this source must comply with the standard requirements and special provisions set forth in this application.

This CAIR Permit applies only to units EU0010, EU0020, EU0030, EU0040 and EU0060 at Ameren – Meramec, Plant 189-0010.

This CAIR permit is effective for the five-year period shown above. The designated representative must submit an application for renewal of this permit in conjunction with the operating permit renewal application.

Date

Director or Designee,
Department of Natural Resources

CAIR Permit Application

(for sources covered under a CAIR SIP)

For more information, refer to 40 CFR 96.121, 96.122, 96.221, 96.222, 96.321, and 96.322

This submission is: New Revised

STEP 1
 Identify the source by plant name, State, and ORIS or facility code

Plant Name	Meramec	State	MO	ORIS/Facility Code	2104
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STEP 2
 Enter the unit ID# for each CAIR unit and indicate to which CAIR programs each unit is subject (by placing an "X" in the column)

Unit ID#	NO _x Annual	SO ₂	NO _x Ozone Season
1	X	X	X
2	X	X	X
3	X	X	X
4	X	X	X
CT01	X	X	X
CT2A	X	X	X
CT2B	X	X	X

STEP 3
 Read the standard requirements and the certification, enter the name of the CAIR designated representative, and sign and date

Standard Requirements

(a) Permit Requirements.

(1) The CAIR designated representative of each CAIR NO_x source, CAIR SO₂ source, and CAIR NO_x Ozone Season source (as applicable) required to have a title V operating permit and each CAIR NO_x unit, CAIR SO₂ unit, and CAIR NO_x Ozone Season unit (as applicable) required to have a title V operating permit at the source shall:

(i) Submit to the permitting authority a complete CAIR permit application under §96.122, §96.222, and §96.322 (as applicable) in accordance with the deadlines specified in §96.121, §96.221, and §96.321 (as applicable); and

(ii) Submit in a timely manner any supplemental information that the permitting authority determines is necessary in order to review a CAIR permit application and issue or deny a CAIR permit.

(2) The owners and operators of each CAIR NO_x source, CAIR SO₂ source, and CAIR NO_x Ozone Season source (as applicable) required to have a title V operating permit and each CAIR NO_x unit, CAIR SO₂ unit, and CAIR NO_x Ozone Season unit (as applicable) required to have a title V operating permit at the source shall have a CAIR permit issued by the permitting authority under subpart CC, CCC, and CCCC (as applicable) of 40 CFR part 96 for the source and operate the source and the unit in compliance with such CAIR permit.

(3) Except as provided in subpart II, III, and IIII (as applicable) of 40 CFR part 96, the owners and operators of a CAIR NO_x source, CAIR SO₂ source, and CAIR NO_x Ozone Season source (as applicable) that is not otherwise required to have a title V operating permit and each CAIR NO_x unit, CAIR SO₂ unit, and CAIR NO_x Ozone Season unit (as applicable) that is not otherwise required to have a title V operating permit are not required to submit a CAIR permit application, and to have a CAIR permit, under subpart CC, CCC, and CCCC (as applicable) of 40 CFR part 96 for such CAIR NO_x source, CAIR SO₂ source, and CAIR NO_x Ozone Season source (as applicable) and such CAIR NO_x unit, CAIR SO₂ unit, and CAIR NO_x Ozone Season unit (as applicable).

Plant Name (from Step 1) **Meramec**

**STEP 3,
continued**

(b) Monitoring, reporting, and recordkeeping requirements.

(1) The owners and operators, and the CAIR designated representative, of each CAIR NO_x source, CAIR SO₂ source, and CAIR NO_x Ozone Season source (as applicable) and each CAIR NO_x unit, CAIR SO₂ unit, and CAIR NO_x Ozone Season unit (as applicable) at the source shall comply with the monitoring, reporting, and recordkeeping requirements of subparts HH, HHH, and HHHH (as applicable) of 40 CFR part 96.

(2) The emissions measurements recorded and reported in accordance with subparts HH, HHH, and HHHH (as applicable) of 40 CFR part 96 shall be used to determine compliance by each CAIR NO_x source, CAIR SO₂ source, and CAIR NO_x Ozone Season source (as applicable) with the CAIR NO_x emissions limitation, CAIR SO₂ emissions limitation, and CAIR NO_x Ozone Season emissions limitation (as applicable) under paragraph (c) of §96.106, §96.206, and §96.306 (as applicable).

(c) Nitrogen oxides emissions requirements.

(1) As of the allowance transfer deadline for a control period, the owners and operators of each CAIR NO_x source and each CAIR NO_x unit at the source shall hold, in the source's compliance account, CAIR NO_x allowances available for compliance deductions for the control period under §96.154(a) in an amount not less than the tons of total nitrogen oxides emissions for the control period from all CAIR NO_x units at the source, as determined in accordance with subpart HH of 40 CFR part 96.

(2) A CAIR NO_x unit shall be subject to the requirements under paragraph (c)(1) of §96.106 for the control period starting on the later of January 1, 2009 or the deadline for meeting the unit's monitor certification requirements under §96.170(b)(1), (2), or (5) and for each control period thereafter.

(3) A CAIR NO_x allowance shall not be deducted, for compliance with the requirements under paragraph (c)(1) of §96.106, for a control period in a calendar year before the year for which the CAIR NO_x allowance was allocated.

(4) CAIR NO_x allowances shall be held in, deducted from, or transferred into or among CAIR NO_x Allowance Tracking System accounts in accordance with subparts FF, GG, and II of 40 CFR part 96.

(5) A CAIR NO_x allowance is a limited authorization to emit one ton of nitrogen oxides in accordance with the CAIR NO_x Annual Trading Program. No provision of the CAIR NO_x Annual Trading Program, the CAIR permit application, the CAIR permit, or an exemption under §96.105 and no provision of law shall be construed to limit the authority of the State or the United States to terminate or limit such authorization.

(6) A CAIR NO_x allowance does not constitute a property right.

(7) Upon recordation by the Administrator under subpart EE, FF, GG, or II of 40 CFR part 96, every allocation, transfer, or deduction of a CAIR NO_x allowance to or from a CAIR NO_x source's compliance account is incorporated automatically in any CAIR permit of the source that includes the CAIR NO_x unit.

Sulfur dioxide emission requirements.

(1) As of the allowance transfer deadline for a control period, the owners and operators of each CAIR SO₂ source and each CAIR SO₂ unit at the source shall hold, in the source's compliance account, a tonnage equivalent of CAIR SO₂ allowances available for compliance deductions for the control period under §96.254(a) and (b) not less than the tons of total sulfur dioxide emissions for the control period from all CAIR SO₂ units at the source, as determined in accordance with subpart HHH of 40 CFR part 96.

(2) A CAIR SO₂ unit shall be subject to the requirements under paragraph (c)(1) of §96.206 for the control period starting on the later of January 1, 2010 or the deadline for meeting the unit's monitor certification requirements under §96.270(b)(1), (2), or (5) and for each control period thereafter.

(3) A CAIR SO₂ allowance shall not be deducted, for compliance with the requirements under paragraph (c)(1) of §96.206, for a control period in a calendar year before the year for which the CAIR SO₂ allowance was allocated.

(4) CAIR SO₂ allowances shall be held in, deducted from, or transferred into or among CAIR SO₂ Allowance Tracking System accounts in accordance with subparts FFF, GGG, and III of 40 CFR part 96.

(5) A CAIR SO₂ allowance is a limited authorization to emit sulfur dioxide in accordance with the CAIR SO₂ Trading Program. No provision of the CAIR SO₂ Trading Program, the CAIR permit application, the CAIR permit, or an exemption under §96.205 and no provision of law shall be construed to limit the authority of the State or the United States to terminate or limit such authorization.

(6) A CAIR SO₂ allowance does not constitute a property right.

(7) Upon recordation by the Administrator under subpart FFF, GGG, or III of 40 CFR part 96, every allocation, transfer, or deduction of a CAIR SO₂ allowance to or from a CAIR SO₂ source's compliance account is incorporated automatically in any CAIR permit of the source that includes the CAIR SO₂ unit.

Nitrogen oxides ozone season emissions requirements.

(1) As of the allowance transfer deadline for a control period, the owners and operators of each CAIR NO_x Ozone Season source and each CAIR NO_x Ozone Season unit at the source shall hold, in the source's compliance account, CAIR NO_x Ozone Season allowances available for compliance deductions for the control period under §96.354(a) in an amount not less than the tons of total nitrogen oxides emissions for the control period from all CAIR NO_x Ozone Season units at the source, as determined in accordance with subpart HHHH of 40 CFR part 96.

(2) A CAIR NO_x Ozone Season unit shall be subject to the requirements under paragraph (c)(1) of §96.306 for the control period starting on the later of May 1, 2009 or the deadline for meeting the unit's monitor certification requirements under §96.370(b)(1), (2), (3) or (7) and for each control period thereafter.

(3) A CAIR NO_x Ozone Season allowance shall not be deducted, for compliance with the requirements under paragraph (c)(1) of §96.306, for a control period in a calendar year before the year for which the CAIR NO_x Ozone Season allowance was allocated.

(4) CAIR NO_x Ozone Season allowances shall be held in, deducted from, or transferred into or among CAIR NO_x Ozone Season Allowance Tracking System accounts in accordance with subparts FFFF, GGGG, and IIII of 40 CFR part 96.

(5) A CAIR NO_x allowance is a limited authorization to emit one ton of nitrogen oxides in accordance with the CAIR NO_x Ozone Season Trading Program. No provision of the CAIR NO_x Ozone Season Trading Program, the CAIR permit application, the CAIR permit, or an exemption under §96.305 and no provision of law shall be construed to limit the authority of the State or the United States to terminate or limit such authorization.

(6) A CAIR NO_x allowance does not constitute a property right.

(7) Upon recordation by the Administrator under subpart EEEE, FFFF, GGGG, or IIII of 40 CFR part 96, every allocation, transfer, or deduction of a CAIR NO_x Ozone Season allowance to or from a CAIR NO_x Ozone Season source's compliance account is incorporated automatically in any CAIR permit of the source.

Plant Name (from Step 1) Meramec

CAIR Permit Application
Page 3

**STEP 3,
continued**

(d) Excess emissions requirements.

If a CAIR NO_x source emits nitrogen oxides during any control period in excess of the CAIR NO_x emissions limitation, then:

(1) The owners and operators of the source and each CAIR NO_x unit at the source shall surrender the CAIR NO_x allowances required for deduction under §96.154(d)(1) and pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, under the Clean Air Act or applicable State law; and

(2) Each ton of such excess emissions and each day of such control period shall constitute a separate violation of this subpart, the Clean Air Act, and applicable State law.

If a CAIR SO₂ source emits sulfur dioxide during any control period in excess of the CAIR SO₂ emissions limitation, then:

(1) The owners and operators of the source and each CAIR SO₂ unit at the source shall surrender the CAIR SO₂ allowances required for deduction under §96.254(d)(1) and pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, under the Clean Air Act or applicable State law; and

(2) Each ton of such excess emissions and each day of such control period shall constitute a separate violation of this subpart, the Clean Air Act, and applicable State law.

If a CAIR NO_x Ozone Season source emits nitrogen oxides during any control period in excess of the CAIR NO_x Ozone Season emissions limitation, then:

(1) The owners and operators of the source and each CAIR NO_x Ozone Season unit at the source shall surrender the CAIR NO_x Ozone Season allowances required for deduction under §96.354(d)(1) and pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, under the Clean Air Act or applicable State law; and

(2) Each ton of such excess emissions and each day of such control period shall constitute a separate violation of this subpart, the Clean Air Act, and applicable State law.

(e) Recordkeeping and Reporting Requirements.

(1) Unless otherwise provided, the owners and operators of the CAIR NO_x source, CAIR SO₂ source, and CAIR NO_x Ozone Season source (as applicable) and each CAIR NO_x unit, CAIR SO₂ unit, and CAIR NO_x Ozone Season unit (as applicable) at the source shall keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This period may be extended for cause, at any time before the end of 5 years, in writing by the permitting authority or the Administrator.

(i) The certificate of representation under §96.113, §96.213, and §96.313 (as applicable) for the CAIR designated representative for the source and each CAIR NO_x unit, CAIR SO₂ unit, and CAIR NO_x Ozone Season unit (as applicable) at the source and all documents that demonstrate the truth of the statements in the certificate of representation; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such documents are superseded because of the submission of a new certificate of representation under §96.113, §96.213, and §96.313 (as applicable) changing the CAIR designated representative.

(ii) All emissions monitoring information, in accordance with subparts HH, HHH, and HHHH (as applicable) of 40 CFR part 96, provided that to the extent that subparts HH, HHH, and HHHH (as applicable) of 40 CFR part 96 provides for a 3-year period for recordkeeping, the 3-year period shall apply.

(iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under the CAIR NO_x Annual Trading Program, CAIR SO₂ Trading Program, and CAIR NO_x Ozone Season Trading Program (as applicable).

(iv) Copies of all documents used to complete a CAIR permit application and any other submission under the CAIR NO_x Annual Trading Program, CAIR SO₂ Trading Program, and CAIR NO_x Ozone Season Trading Program (as applicable) or to demonstrate compliance with the requirements of the CAIR NO_x Annual Trading Program, CAIR SO₂ Trading Program, and CAIR NO_x Ozone Season Trading Program (as applicable).

(2) The CAIR designated representative of a CAIR NO_x source, CAIR SO₂ source, and CAIR NO_x Ozone Season source (as applicable) and each CAIR NO_x unit, CAIR SO₂ unit, and CAIR NO_x Ozone Season unit (as applicable) at the source shall submit the reports required under the CAIR NO_x Annual Trading Program, CAIR SO₂ Trading Program, and CAIR NO_x Ozone Season Trading Program (as applicable) including those under subparts HH, HHH, and HHHH (as applicable) of 40 CFR part 96.

(f) Liability.

(1) Each CAIR NO_x source, CAIR SO₂ source, and CAIR NO_x Ozone Season source (as applicable) and each NO_x unit, CAIR SO₂ unit, and CAIR NO_x Ozone Season unit (as applicable) shall meet the requirements of the CAIR NO_x Annual Trading Program, CAIR SO₂ Trading Program, and CAIR NO_x Ozone Season Trading Program (as applicable).

(2) Any provision of the CAIR NO_x Annual Trading Program, CAIR SO₂ Trading Program, and CAIR NO_x Ozone Season Trading Program (as applicable) that applies to a CAIR NO_x source, CAIR SO₂ source, and CAIR NO_x Ozone Season source (as applicable) or the CAIR designated representative of a CAIR NO_x source, CAIR SO₂ source, and CAIR NO_x Ozone Season source (as applicable) shall also apply to the owners and operators of such source and of the CAIR NO_x units, CAIR SO₂ units, and CAIR NO_x Ozone Season units (as applicable) at the source.

(3) Any provision of the CAIR NO_x Annual Trading Program, CAIR SO₂ Trading Program, and CAIR NO_x Ozone Season Trading Program (as applicable) that applies to a CAIR NO_x unit, CAIR SO₂ unit, and CAIR NO_x Ozone Season unit (as applicable) or the CAIR designated representative of a CAIR NO_x unit, CAIR SO₂ unit, and CAIR NO_x Ozone Season unit (as applicable) shall also apply to the owners and operators of such unit.

Plant Name (from Step 1) Meramec

CAIR Permit Application
Page 4

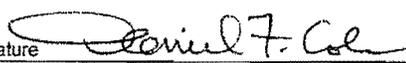
**STEP 3,
continued**

(g) Effect on Other Authorities.

No provision of the CAIR NO_x Annual Trading Program, CAIR SO₂ Trading Program, and CAIR NO_x Ozone Season Trading Program (as applicable), a CAIR permit application, a CAIR permit, or an exemption under § 96.105, §96.205, and §96.305 (as applicable) shall be construed as exempting or excluding the owners and operators, and the CAIR designated representative, of a CAIR NO_x source, CAIR SO₂ source, and CAIR NO_x Ozone Season source (as applicable) or CAIR NO_x unit, CAIR SO₂ unit, and CAIR NO_x Ozone Season unit (as applicable) from compliance with any other provision of the applicable, approved State implementation plan, a federally enforceable permit, or the Clean Air Act.

Certification

I am authorized to make this submission on behalf of the owners and operators of the source or units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Name Daniel F. Cole	
Signature 	Date June 28, 2007

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) AmerenUE-Meramec Part 70 revised Operating Permit Application, received May 22, 2008;
- 2) AmerenUE-Meramec Part 70 Operating Permit Minor Modification Application, received September 10, 2007;
- 3) AmerenUE-Meramec CAIR Permit Application, received July 2, 2007;
- 4) AmerenUE-Meramec Part 70 Operating Permit, issued June 7, 2001;
- 5) 2002-2006 Emissions Inventory Questionnaires;
- 6) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition;
- 7) Meramec Power Plant Compliance Assurance Monitoring Test Protocol and CAM Plan prepared by RMB Consulting & Research, Inc., dated September 19, 2005;
- 8) CAM Particulate Emissions Testing Report, dated December 1, 2005;
- 9) St. Louis County Air Pollution Control Program Operating/Construction Permit #4566;
- 10) St. Louis County Air Pollution Control Program Operating/Construction Permit #4567;
- 11) St. Louis County Air Pollution Control Program Operating/Construction Permit #4569;
- 12) St. Louis County Air Pollution Control Program Operating/Construction Permit #7261;
- 13) St. Louis County Air Pollution Control Program Construction Permit #0564 (Operating Permit #4341), Turbine #1.

Applicable Requirements Included in the Operating Permit but Not in the Application

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.

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

The permit application states that this rule is not applicable because “this installation is not in this source category.” However, this rule applies to all facilities that receive coal in the Saint Louis metropolitan area. Ameren is therefore subject to this regulation.

Other Air Regulations Determined Not to Apply to the Operating Permit

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

10 CSR 10-5.130, *Certain Coals to be Washed*

The boilers are the only units that combust coal at the Meramec Plant. Since these units are subject to 10 CSR 10-6.260 which limits sulfur dioxide emissions to 2.3 pounds per million BTU of heat input and are also subject to 10 CSR 10-5.030, they are exempt from this regulation.

10 CSR 10-5.180, *Emission of Visible Air Contaminates From Internal Combustion Engine*

This rule was rescinded November 30, 2002.

10 CSR 10-5.240, *Additional Air Quality Control Measures May be Required when Sources are Clustered in Small Land Areas*

This installation is subject to these regulations if the Air Conservation Commission prescribes more restrictive and more extensive regulations than what has already been promulgated. At the time of this review, no such regulations had been imposed. As such, this regulation was not cited in the operating permit.

10 CSR 10-5.500, *Control of Emissions from Volatile Organic Liquid Storage*

This rule does not apply to any storage tanks at the installation since none of the tanks with storage capacities exceeding 40,000 gallons store volatile organic materials with maximum true vapor pressures exceeding 0.5 psia.

10 CSR 10-5.510, *Control of Emissions of Nitrogen Oxides*

This rule does not apply to any units at the installation since each one meets one of the exemptions stated in the rule:

- The boilers are all subject to Phase II acid rain requirements.
- The emergency diesel generator is a stationary internal combustion engine which operates less than seven hundred fifty (750) hours annually and less than four hundred (400) hours during ozone season.
- Combustion Turbine CT01 is a stationary combustion turbine that has potential emissions greater than 100 tons of NO_x per year, but since 2001, the actual emissions have never exceeded 6.83 tons. The turbine is exempt from this rule at the time of permit issuance in accordance with Section (1)(C)9 it has not individually exceeded 30 tons of NO_x emissions since the rule was promulgated in 2000. If the turbine exceeds this threshold at any time, it will become subject to this rule.
- Combustion Turbine CT2A/CT2B is a stationary combustion turbine that is limited to 40 tons of NO_x per year and is therefore not subject to this rule.

10 CSR 10-5.520, *Control of Volatile Organic Compounds From Existing Major Sources*

The boilers are exempted from this rule per Section (3)(H)1, “Any emission unit that is used to combust fuel.”

10 CSR 10-6.240, *Asbestos Abatement Projects – Registration, Notification and Performance Requirements*

This rule was rescinded September 30, 2004.

10 CSR 10-6.368, *Control of Mercury Emissions from Electric Generating Units*

This state rule was not officially rescinded at the time of permit issuance, however the Federal CAMR requirement upon which this rule was based has been vacated, therefore, this rule cannot currently be enforced.

10 CSR 10-6.400(1)(B)12, *Restriction of Emissions of Particulate Matter from Industrial Processes*

The regulation was determined not to apply to EU0100—Rail Car Unloading Pit; Convey/Transfer/Stack Coal due to an exemption found under the above-referenced section for grinding, crushing, and conveying operations at a power plant.

Construction Permit Revisions

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

- 1) St. Louis County Air Pollution Control Program Construction and Operating Permits #4566, 4567, 4568, and 4569, Boilers #1, 2, 3 and 4, respectively, were updated to reflect the installation of low NO_x burners.

NSPS Applicability

No 40 CFR Part 60 standards apply to this installation. The following standards are not applicable as described.

- 1) 40 CFR Part 63 Subpart Y, *Standards of Performance for Coal Preparation Plants*
The coal handling equipment was constructed prior to the applicability date of the Subpart.
- 2) 40 CFR Part 63 Subparts K, Ka or Kb, *Standards of Performance for Storage Vessels*
All storage tanks, except the 1.5 million gallon diesel tank, exceeding 10,000 gallons storage capacity were installed prior to the applicability date of The 1.5 million gallon diesel tank would be subject to Subpart K because of its size and date of installation, but diesel is not, by definition, a petroleum liquid.
- 3) 40 CFR Part 63 Subpart GG, *Standards of Performance for Stationary Gas Turbines*
Combustion turbine #2 was installed at this location in 1999. However, the turbine was manufactured prior to October 3, 1977, and is therefore exempt from the requirements of this Subpart.

MACT Applicability

40 CFR Part 63, Subparts YYYY and ZZZZ apply to this installation. These subparts were not listed as applicable in the application, but Ameren is subject to them. 40 CFR Part 63, Subpart CCCCCC does not apply to this installation as described below.

- 1) 40 CFR, Part 63, Subpart YYYY—*National Emission Standards for Hazardous Air Pollutants for Stationary Combustion Turbines*
The stationary combustion turbines are subject to Subpart YYYY, but do not have to meet any requirements in accordance with 63.6090(a)(4):

“Existing stationary combustion turbines in all subcategories do not have to meet the requirements of this subpart and of subpart A of this part. No initial notification is necessary for any existing stationary combustion turbine, even if a new or reconstructed turbine in the same category would require an initial notification.”

- 2) 40 CFR Part 63, Subpart ZZZZ—*National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*

The initial notification for Subpart ZZZZ was received on 10/22/2007. The emergency generator is subject to Subpart ZZZZ, but does not have to meet any requirements except for submitting an initial notification in accordance with 63.6590(b)(1):

“*Stationary RICE subject to limited requirements.* (1) An affected source which meets either of the criteria in paragraph (b)(1)(i) through (ii) of this section does not have to meet the requirements of this subpart and of subpart A of this part except for the initial notification requirements of §63.6645(d).

(i) The stationary RICE is a new or reconstructed emergency stationary RICE.”

The emergency generator meets the definition established in § 63.6675:

“*Emergency stationary RICE* means any stationary RICE that operates in an emergency situation. Examples include stationary RICE used to produce power for critical networks or equipment (including power supplied to portions of a facility) when electric power from the local utility is interrupted, or stationary RICE used to pump water in the case of fire or flood, etc. Emergency stationary RICE may be operated for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by the manufacturer, the vendor, or the insurance company associated with the engine. Required testing of such units should be minimized, but there is no time limit on the use of emergency stationary RICE in emergency situations and for routine testing and maintenance. Emergency stationary RICE may also operate an additional 50 hours per year in non-emergency situations.”

3) 40 CFR Part 63 Subpart CCCCCC, *Gasoline Dispensing Facilities*, does not apply to this facility since Ameren is not an area source of HAPS according to the following definition from 40 CFR Part 63 Subpart A: “*Area source* means any stationary source of hazardous air pollutants that is not a major source as defined in this part.”

NESHAP Applicability

40 CFR Part 61, Subpart M, *National Emission Standard for Asbestos*, is the only subpart applicable to this installation, and it has been addressed in the core permit conditions.

Other Regulatory Determinations

10 CSR 10-5.220, *Control of Petroleum Liquid Storage, Loading and Transfer*

This rule does not apply to any storage tanks (other than the 1000-gallon tank associated with the vehicle fueling station) at the installation since all of the tanks with storage capacities exceeding 40,000 gallons store petroleum liquids with maximum true vapor pressures less than 4 psia at 90°F.

Co-combustion of non-hazardous wastes:

A request to include the co-combustion non-hazardous wastes was included in the cover letter for the Part 70 Application received December 6, 2005. Ameren requested the approval be included in the Statement of Basis, however, the determination was made that the approval should be included in the body of the permit. See Permit Condition EU0010-Alternate Operating Scenarios.

The March 1, 1996 letter from Steve Feeler, Chief of Enforcement Air Pollution Control Program to Mr. Michael L. Menne, Supervisor, Environmental Services Union Electric Company outlines the proposed emission limit of 2.3 pounds of SO₂ per million BTU on a 3-hour basis. The points concerning compliance incorporate the following parameters:

1) Unintentional blending of residual high sulfur coal, or other unusual circumstances might result in exceedances. Such an exceedance would have to be reported, but enforcement discretion would be applied in evaluating accompanying explanations of the incident. If the exceedance were determined to be accidental or unavoidable further enforcement action would not be taken. Frequent repetition of similar incidents would not, however, be dealt with so leniently.

- 2) A. Compliance would be based on actual unadjusted CEMS data.
 - 1) Artificially high SO₂ emission rate values could occur during start-up owing to inclusions of low CO₂ levels in the lb/MMBTU calculation.
 - 2) Because no missing data substitution or bias adjustment requirements appear in the 40 CFR Part 60 regulations which form the basis for state excess emission reporting requirements, such adjustments could not be required. However, no such limitation exists with respect to emission inventory data and bias adjustment has been required for sources calculating emission fees based on CEMS data which was biased low.
- B. Such an apparent exceedance would have to be reported and appropriately explained, but would not be subject to enforcement under 10 CSR 10-6.050 which exempts violations during start-up, shut-down and malfunction periods.
- 3) Twenty-four hours or more might be required to restore compliance after accidental firing of high sulfur coal began. One to twenty-four 3-hour periods on three days per month at ≤ 120 percent of the standard would be permitted. Compliance is determined on the basis of 3-hour rolling averages. In any twenty-four hour day there are only 22 3-hour rolling averages, not twenty-four, because the last two would have occurred on the following day. Strict interpretation of the regulation would allow a maximum of 72 hours at > 100 percent but ≤ 120 percent of the standard in any month. A three-hour period at >100 percent and ≤ 120 percent of the standard beginning in the 71st or 72nd hour would be a violation.

Calculations

10 CSR 10-6.400 Control of Emission of Particulate Matter From Industrial Processes

Fly Ash Handling System, EU0150-001

Per Construction Permit #6743

Maximum hourly design rate= 22.7 ton/hr

AP-42 Emission Factor (Tables 11.12-2)=0.02 lb PM₁₀/ton

Filter separators:

22.7 ton/hr x 0.02 lb PM₁₀/ton x (1-.99 control)=0.005 lb PM₁₀

Silos:

22.7 ton/hr x 0.02 lb PM₁₀/ton x (1-.99 control)=0.005 lb PM₁₀

Truck Loading:

22.7 ton/hr x 0.02 lb PM₁₀/ton x (1-.99 control)=0.005 lb PM₁₀

Potential PM₁₀ Emissions from Three Handling Operations=

0.015 lb PM₁₀/hr < 99.63 lb/hr PM₁₀

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 (1) 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 (1) 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 Air Pollution Control Program a schedule for achieving compliance for that regulation(s).

Drafted by Jennifer Phillips, Air Emission Specialist
St. Louis County Air Pollution Control Program

Reviewed by:

Jason Dickneite
Environmental Engineer