

PART 70

PERMIT TO OPERATE

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

Operating Permit Number: OP2020-003
Expiration Date: **June 4, 2025**
Installation ID: 051-0075
Project Number: 2018-03-051

Installation Name and Address

Power Generation Facility
Ameresco Jefferson City, LLC
8432 No More Victims Rd.
Jefferson City, MO 65101
Cole County

Parent Company's Name and Address

Ameresco Jefferson City LLC
111 Speen St., Ste 410
Framingham, MA 01701

Landfill Gas Treatment Facility

Ameresco Jefferson City, LLC
5605 Moreau River Access Road
Jefferson City, MO 65101
Cole County

Installation Description:

Power Generation Facility:

Ameresco Jefferson City LLC owns and operates a renewable power generation facility on land leased from the Missouri Department of Corrections at the Jefferson City Correctional Center (JCCC). Ameresco installed three reciprocating internal combustion engines at the installation that can generate 3.2 MW of electricity using landfill gas (LFG) fuel. Each engine is equipped with a heat recovery steam generator and the steam and hot water is piped to the JCCC.

Landfill Gas Treatment Facility:

The LFG is generated at the Jefferson City Landfill, LLC. Ameresco installed dewatering and filtration equipment and a regenerative gas conditioning system at the landfill to scrub impurities from the landfill gas. A flare controls the system purge gas from the regenerative conditioning system. Ameresco also owns and operates the underground pipeline that transports the conditioned LFG fuel to the power installation. This installation is a major source of CO and HAPs.

Ameresco requested their LFG treatment facility and their power generation facility remain one installation for permitting purposes.

June 4, 2020

Effective Date



Director or Designee
Department of Natural Resources

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I. Installation Equipment Listing

EMISSION UNITS WITH LIMITATIONS

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

Power Generation Facility:

Emission Points EP1, EP2 and EP3 are the emission units located at the power generation facility.

Landfill Gas Treatment Facility:

Emission Points EP4 and EP5 are the emission units located at the landfill gas (LFG) treatment facility.

Emission Point	Description
EP1	Engine 1: Reciprocating Internal Combustion Engine; 1470 brake horsepower mechanical output, 10 MMBtu/hr heat input, General Electric, Model: JMS 320 with 1060 kW generator and heat recovery steam generator, units constructed 1/22/2009. Burns treated landfill gas
EP2	Engine 2: Reciprocating Internal Combustion Engine; 1470 brake horsepower mechanical output, 10 MMBtu/hr heat input, General Electric, Model: JMS 320 with 1060 kW generator and heat recovery steam generator, units constructed 1/22/2009. Burns treated landfill gas
EP3	Engine 3: Reciprocating Internal Combustion Engine; 1470 brake horsepower mechanical output, 10 MMBtu/hr heat input, General Electric, Model: JMS 320 with 1060 kW generator and heat recovery steam generator, units constructed 1/22/2009. Burns treated landfill gas
EP4	Temperature Swing Adsorption (TSA) Flare: Gas Treatment and Thermal Swing Adsorption Unit with Open Flare, fired by landfill gas; 300 scfm
EP5	Landfill Gas Treatment System: filters, compresses, and dehydrates landfill gas

EMISSION UNITS WITHOUT SPECIFIC LIMITATIONS

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

None

II. Plant Wide Emission Limitations

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

PERMIT CONDITION PW001

**10 CSR 10-6.060, Construction Permits Required
Construction Permit 032008-010, Issued February 13, 2007**

Emission Limitation:

The permittee shall emit less than 40 tons of nitrogen oxides (NO_x) in any consecutive 12-month period from the entire installation as described in the installation equipment listing of this permit.

[Special Condition 2A]

Operational Limitation:

Each of the electric generator sets shall be equipped with a non-resettable hour meter to record the hours of operation for that unit. [Special Condition 2B]

Monitoring/Recordkeeping:

- 1) The permittee shall use Attachment B, or equivalent forms approved by the Air Pollution Control Program to demonstrate compliance with the NO_x emission limitation. [Special Condition 2B]
- 2) The permittee shall maintain all records for not less than five years and shall make them available immediately to any Department of Natural Resources' personnel upon request.
[Special Condition 2B]

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program's Compliance and Enforcement Section, P.O. Box 176, Jefferson City, Missouri, 65102 or AirComplianceReporting@dnr.mo.gov, no later than ten days after the end of the month during which the records indicate that the source exceeded the emission limitation. [Special Condition 2C]
- 2) The permittee shall report any deviations from the standards, test methods and procedures, monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and compliance certification required by Section V of this permit.

III. Emission Unit Specific Emission Limitations

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

Power Generation Facility:

Permit Condition 003 and Permit Condition 004 apply to the emission units associated with Emission Points EP1, EP2, and EP3 located at the power generation installation.

Landfill Gas Treatment Facility:

Permit Condition 001, Permit Condition 002 and Permit Condition 004 apply to the emission units associated with Emission Points EP4 and EP5 located at the LFG Treatment installation.

PERMIT CONDITION 001	
10 CSR 10-6.070 New Source Performance Regulations	
40 CFR Part 60, Subpart A General Provisions and Subpart WWW Standards of Performance for Municipal Solid Waste Landfills	
Emission Point	Description
EP5	Landfill Gas Treatment System: filters, compresses, and dehydrates landfill gas

Operational Standards:

- 1) The control system design plan shall include any alternatives to the operational standards, test methods, procedures, compliance measures, monitoring, recordkeeping or reporting provisions of §§60.753 through 60.758 proposed by the owner or operator.[§60.752(b)(2)(i)(B)]
- 2) The permittee shall route all the received collected gas¹ to a control system that complies with the requirements in §60.752(b)(2)(iii)(C).[§60.752(b)(2)(iii)]
 - a) Route the collected gas to a treatment system that processes the collected gas for subsequent sale or use.[§60.752(b)(2)(iii)(C)]
- 3) The permittee shall operate the control device installed to comply with Subpart WWW in accordance with the applicable provisions of §60.753(e), §60.753(f), §60.755(e), and §60.756(d).[§60.752(b)(2)(iv)]
- 4) Operate the system such that all collected gases are vented to a control system designed and operated in compliance with §60.752(b)(2)(iii). In the event the control system is inoperable, all valves in the control system contributing to venting of the gas to the atmosphere shall be closed within one hour.[§60.753(e)]
- 5) Operate the control or treatment system at all times when the collected gas is routed to the system.[§60.753(f)]

¹ The permittee does not collect gas from the wellfield. Rather, it receives gas at a specified delivery point from the Jefferson City Landfill. Jefferson City Landfill is responsible for the collection system and is the producer of the collected gas that the permittee receives.

Compliance Requirements:

The provisions of Subpart WWW apply at all times, except during periods of start-up, shutdown, or malfunction, provided that the duration of start-up, shutdown, or malfunction shall not exceed 1 hour for treatment or control devices. [§60.755(e)]

Monitoring:

The permittee seeking to demonstrate compliance with §60.752(b)(2)(iii) using a device other than an open flare or an enclosed combustor shall provide information satisfactory to the Director as provided in §60.752(b)(2)(i)(B) describing the operation of the control device, the operating parameters that would indicate proper performance, and appropriate monitoring procedures. The Director shall review the information and either approve it, or request that additional information be submitted. The Director may specify additional appropriate monitoring procedures. [§60.756(d)]

Recordkeeping:

The permittee shall keep for at least 5 years up-to-date, readily accessible records of all control system exceedances of the operational standards of §60.753(e) and §60.753(f) and the location of each exceedance. [§60.758(e)]

Reporting:

The permittee shall report any deviations from the standards, test methods and procedures, monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and compliance certification required by Section V of this permit.

PERMIT CONDITION 002	
10 CSR 10-6.075 Maximum Achievable Control Technology Regulations	
40 CFR Part 63, Subpart A General Provisions and Subpart AAAA National Emission Standards for Hazardous Air Pollutants: Municipal Solid Waste Landfills	
Emission Point	Description
EP5	Landfill Gas Treatment System: filters, compresses, and dehydrates landfill gas

Standards:

- 1) The permittee shall comply with the applicable requirements of 40 CFR Part 60, Subpart WWW as stated in Permit Condition 001. [§63.1955(a)(1)]
- 2) The permittee must comply with the applicable requirements in §§63.1960 through 63.1985 and with the general provisions of this part specified in Table 1 of 40 CFR Part 63, Subpart AAAA. [§63.1955(b)]
- 3) For approval of control systems that include any alternatives to the operational standards, test methods, procedures, compliance measures, monitoring, recordkeeping or reporting provisions, the permittee must follow the procedures in 40 CFR 60.752(b)(2). If alternatives have already been approved under 40 CFR part 60 Subpart WWW, these alternatives can be used to comply with 40 CFR Part 63, Subpart AAAA, except that all affected sources must comply with the SSM requirements in Subpart A of this part as specified in Table 1 of 40 CFR Part 63, Subpart AAAA and all affected sources must submit compliance reports every 6 months as specified in §63.1980(b), including information on all deviations that occurred during the 6-month reporting period.[§63.1955(c)]

Compliance Requirements:

- 1) Compliance is determined in the same way it is determined for 40 CFR Part 60, Subpart WWW, including performance testing, continuous parameter monitoring, and other credible evidence. In addition, continuous parameter monitoring data, collected under 40 CFR 60.756(d) of Subpart WWW, are used to demonstrate compliance with the operating conditions for control systems. If a deviation occurs, the permittee has failed to meet the control device operating conditions described in Subpart AAAA and have deviated from the requirements of 40 CFR Part 63, Subpart AAAA. Finally, the permittee must develop a written SSM plan according to the provisions in 40 CFR 63.6(e)(3). A copy of the SSM plan must be maintained on site. Failure to write or maintain a copy of the SSM plan is a deviation from the requirements of 40 CFR Part 63, Subpart AAAA. [§63.1960]
- 2) A deviation is defined in §63.1990. For the purposes of the SSM plan requirements, deviations include the following item: [§63.1965]
 - a) A deviation occurs when a SSM plan is not developed or maintained on site. [§63.1965(c)]

Recordkeeping:

The permittee must also keep records and reports as specified in the general provisions of 40 CFR part 60 and part 63 as shown in Table 1 of 40 CFR Part 63, Subpart AAAA. Applicable records in the general provisions include items such as SSM plans and the SSM plan reports. [§63.1980(b)]

Reporting:

The permittee shall report any deviations from the standards, test methods and procedures, monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and compliance certification required by Section V of this permit.

PERMIT CONDITION 003	
10 CSR 10-6.070 New Source Performance Regulations	
40 CFR Part 60, Subpart A General Provisions and 40 CFR Part 60 Subpart JJJJ- Standards of Performance for Stationary Spark Ignition Internal Combustion Engines	
Emission Point	Description
EP1	Engine 1: Reciprocating Internal Combustion Engine; 1470 brake horsepower mechanical output, 10 MMBtu/hr heat input, General Electric, Model: JMS 320 with 1060 kW generator and heat recovery steam generator, units constructed 1/22/2009. Burns treated landfill gas
EP2	Engine 2: Reciprocating Internal Combustion Engine; 1470 brake horsepower mechanical output, 10 MMBtu/hr heat input, General Electric, Model: JMS 320 with 1060 kW generator and heat recovery steam generator, units constructed 1/22/2009. Burns treated landfill gas
EP3	Engine 3: Reciprocating Internal Combustion Engine; 1470 brake horsepower mechanical output, 10 MMBtu/hr heat input, General Electric, Model: JMS 320 with 1060 kW generator and heat recovery steam generator, units constructed 1/22/2009. Burns treated landfill gas

Emission Standards:

- 1) The permittee must operate and maintain the stationary SI ICE that achieve the emission standards as required in §60.4233 over the entire life of the engine. [§60.4234]
- 2) The permittee must comply with the emission standards in Table 1 to NSPS JJJJ for their stationary SI ICE: [§60.4233(e)]

Table 1 to Subpart JJJJ of Part 60—NO_x, CO, and VOC Emission Standards for Stationary Non-Emergency SI Engines ≥100 HP (Except Gasoline and Rich Burn LPG), Stationary SI Landfill/Digester Gas Engines, and Stationary Emergency Engines >25 HP

Engine type and fuel	Maximum engine power	Manufacture date	Emission standards ²					
			g/HP-hr			ppm _{vd} at 15% O ₂		
			NO _x	CO	VOC ³	NO _x	CO	VOC ³
Landfill Gas	HP≥500	7/1/2007	3.0	5.0	1.0	220	610	80

Compliance Requirements:

- 1) The permittee must demonstrate compliance according to the following to demonstrate compliance with the emission standards: [§60.4243(b)(2)]
 - a) The permittee must keep a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions. [§60.4243(b)(2)(ii)]
 - b) The permittee must conduct subsequent performance testing every 8,760 hours of operation or every 3 years, whichever comes first, thereafter to demonstrate compliance⁴. [§60.4243(b)(2)(ii)]

General Provisions:

The permittee shall comply with the applicable General Provisions §§60.1 through 60.19 in Table 3 of 40 CFR Part 60, Subpart JJJJ. [§60.4246]

Recordkeeping:

- 1) The permittee shall keep all records of the following information for the engines: [§60.4245(a)]
 - a) All notifications submitted to comply with 40 CFR Part 60, Subpart JJJJ and all documentation supporting any notification. [§60.4245(a)(1)]
 - b) Maintenance conducted on the engine. [§60.4245(a)(2)]
 - c) If the stationary SI internal combustion engine is not a certified engine or is a certified engine operating in a non-certified manner and subject to §60.4243(a)(2), documentation that the engine meets the emission standards. [§60.4245(a)(4)]
- 2) The permittee shall maintain all records for not less than five years and shall make them available immediately to any Department of Natural Resources' personnel upon request.

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program's Compliance and Enforcement Section, P.O. Box 176, Jefferson City, Missouri, 65102 or AirComplianceReporting@dnr.mo.gov, no later than ten days after the end of the month during which the records indicate that the source exceeded the emission standards.

² The permittee with a non-certified SI engine may choose to comply with the emission standards in units of either g/HP-hr or ppm_{vd} at 15 percent O₂.

³ For purposes of 40 CFR Part 60, Subpart JJJJ, when calculating emissions of volatile organic compounds, emissions of formaldehyde should not be included.

⁴ As of issuance of this permit, the most recent testing occurred on April 10 through April 11, 2019 and demonstrated compliance with the ppm_{vd} at 15% O₂ emission standards for landfill gas. See Statement of Basis for results.

- 2) The permittee shall report any deviations from the standards, test methods and procedures, monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and compliance certification required by Section V of this permit.

PERMIT CONDITION 004	
10 CSR 10-6.260, Restriction of Emission of Sulfur Compounds⁵	
Emission Point	Description
EP1	Engine 1: Reciprocating Internal Combustion Engine; MHDR=1470 brake horsepower mechanical output, 10 MMBtu/hr heat input, General Electric, Model: JMS 320 with 1060 kW generator and heat recovery steam generator, units constructed 1/22/2009. Burns treated landfill gas
EP2	Engine 2: Reciprocating Internal Combustion Engine; MHDR=1470 brake horsepower mechanical output, 10 MMBtu/hr heat input, General Electric, Model: JMS 320 with 1060 kW generator and heat recovery steam generator, units constructed 1/22/2009. Burns treated landfill gas
EP3	Engine 3: Reciprocating Internal Combustion Engine; MHDR=1470 brake horsepower mechanical output, 10 MMBtu/hr heat input, General Electric, Model: JMS 320 with 1060 kW generator and heat recovery steam generator, units constructed 1/22/2009. Burns treated landfill gas
EP4	Temperature Swing Adsorption (TSA) Flare: Gas Treatment and Thermal Swing Adsorption Unit with Open Flare, fired by treated landfill gas; MHDR=300 scfm

Emission Limitation:

The permittee shall not cause or permit the emission into the atmosphere gases containing more than 500 ppm_v sulfur dioxide or more than 35 mg/m³ of sulfuric acid or sulfur trioxide or any combination of those gases averaged on any consecutive three-hour time period. [10 CSR 10-6.260(3)(A)2]

Monitoring/Recordkeeping/Reporting:

- 1) The permittee shall determine SO₂ emissions using the landfill gas total reduced sulfur (TRS) as H₂S, fuel flow rate in SCFM (60°F, 14.697 psi), and the following material balance equations.

$$\frac{lb\ SO_2}{hr} = \frac{ppm\ TRS\ as\ H_2S}{10^6} \cdot \frac{SCF}{min} \cdot \frac{60\ min}{hr} \cdot \frac{28.32\ L}{SCF} \cdot \frac{mol}{23.69\ L} \cdot \frac{34.01\ g\ H_2S}{mol} \cdot \frac{64.06\ g\ SO_2}{34.01\ g\ H_2S} \cdot \frac{lb}{453.6\ g}$$

- 2) During each test, the permittee shall analyze one sample of collected landfill gas for speciated and total sulfur using ASTM D5504 or an alternative method preapproved by the Director.
- 3) The initial test and SO₂ calculation shall be performed during the permittee’s next annual source test of their engines.
- 4) Subsequent tests and SO₂ calculations shall be performed during each annual source test of their engines.
- 5) A completed Performance Test Plan Form available at dnr.mo.gov/forms shall be submitted to the Air Pollution Control Program StackTesting@dnr.mo.gov at least 30 days prior to the proposed

⁵ This regulation was rescinded from Missouri Code of State Regulations on November 30, 2015 but it still remains in the EPA-approved SIP and thus still remains an applicable regulation. Upon adoption of 10 CSR 10-6.261 into Missouri’s SIP, 10 CSR 6.260 will be removed from the SIP and thus this rule will no longer be applicable to the installation. No action on the part of the permittee is needed to revise the operating permit. Upon removal of 10 CSR 10-6.260 from the SIP, this Permit Condition shall no longer be enforceable.

initial test date so that the Air Pollution Control Program may arrange a pretest meeting, if necessary, and assure that the test date is acceptable for an observer to be present. The Proposed Test Plan may serve the purpose of notification and shall be approved by the Air Pollution Control Program Compliance and Enforcement Section prior to conducting the required initial emission testing. Subsequent tests do not require prior notification.

- 6) One electronic copy of a written report of the performance test results shall be submitted to StackTesting@dnr.mo.gov within 60 days of completion of any required testing. The report must include legible copies of the raw data sheets, analytical instrument laboratory data, and complete sample calculations from the required U.S. EPA Method for at least one sample run.

Reporting:

- 1) The permittee shall report any exceedance of any of the terms imposed by this permit condition, or any malfunction which could cause an exceedance of any of the terms imposed by this permit condition, no later than ten days after the exceedance or event causing the exceedance. The permittee shall submit these reports to Missouri Compliance Coordinator, Air Branch, Enforcement and Compliance Assurance Division, EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219.
- 2) The permittee shall report any deviations from the monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report (SAM) and annual compliance certification (ACC). The permittee shall submit the SAM and ACC reports to both the EPA Region VII and Air Pollution Control Program's Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov.

IV. Core Permit Requirements

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

10 CSR 10-6.045 Open Burning Requirements

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

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

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

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

10 CSR 10-6.060 Construction Permits Required

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

10 CSR 10-6.065 Operating Permits

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

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

- 1) The permittee shall submit a Full Emissions Report either electronically via MoEIS, which requires Form 1.0 signed by an authorized company representative, or on Emission Inventory Questionnaire (EIQ) paper forms on the frequency specified in this rule and in accordance with the requirements outlined in this rule. Alternate methods of reporting the emissions, such as spreadsheet file, can be submitted for approval by the Director.
- 2) Public Availability of Emission Data and Process Information. Any information obtained pursuant to the rule(s) of the Missouri Air Conservation Commission that would not be entitled to confidential treatment under 10 CSR 10-6.210 shall be made available to any member of the public upon request.
- 3) The permittee shall 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.

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

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

10 CSR 10-6.150 Circumvention

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

10 CSR 10-6.165 Restriction of Emission of Odors

This requirement is a State Only permit requirement.

No person may cause, permit or allow the emission of odorous matter in concentrations and frequencies or for durations that odor can be perceived when one volume of odorous air is diluted with seven volumes of odor-free air for two separate trials not less than 15 minutes apart within the period of one hour. This odor evaluation shall be taken at a location outside of the installation's property boundary.

10 CSR 10-6.170

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

Emission Limitation:

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

Monitoring:

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

The permittee shall maintain the following monitoring schedule:

- 1) The permittee shall conduct weekly observations for a minimum of eight (8) consecutive weeks after permit issuance.
- 2) Should no violation of this regulation be observed during this period then-
 - a) The permittee may observe once every two (2) weeks for a period of eight (8) weeks.
 - b) If a violation is noted, monitoring reverts to weekly.
 - c) Should no violation of this regulation be observed during this period then-
 - i) The permittee may observe once per month.
 - ii) If a violation is noted, monitoring reverts to weekly.
- 3) If the permittee reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner to the initial monitoring frequency.
- 4) Issuance of a renewal operating permit does not restart the schedule.

Recordkeeping:

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

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

10 CSR 10-6.180 Measurement of Emissions of Air Contaminants

- 1) The Director may require any person responsible for the source of emission of air contaminants to make or have made tests to determine the quantity or nature, or both, of emission of air contaminants from the source. The Director may specify testing methods to be used in accordance with good professional practice. The Director may observe the testing. All tests shall be performed by qualified personnel.
- 2) The Director may conduct tests of emissions of air contaminants from any source. Upon request of the Director, the person responsible for the source to be tested shall provide necessary ports in stacks or ducts and other safe and proper sampling and testing facilities, exclusive of instruments and sensing devices as may be necessary for proper determination of the emission of air contaminants.
- 3) The Director shall be given a copy of the test results in writing and signed by the person responsible for the tests.

10 CSR 10-6.280 Compliance Monitoring Usage

- 1) The permittee is not prohibited from using the following in addition to any specified compliance methods for the purpose of submission of compliance certificates:
 - a) Monitoring methods outlined in 40 CFR Part 64;
 - b) Monitoring method(s) approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
 - c) Any other monitoring methods approved by the Director.
- 2) Any credible evidence may be used for the purpose of establishing whether a permittee has violated or is in violation of any such plan or other applicable requirement. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred at an installation:
 - a) Monitoring methods outlined in 40 CFR Part 64;
 - b) A monitoring method approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
 - c) Compliance test methods specified in the rule cited as the authority for the emission limitations.
- 3) The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
 - a) Applicable monitoring or testing methods, cited in:
 - i) 10 CSR 10-6.030, "Sampling Methods for Air Pollution Sources";
 - ii) 10 CSR 10-6.040, "Reference Methods";
 - iii) 10 CSR 10-6.070, "New Source Performance Standards";
 - iv) 10 CSR 10-6.080, "Emission Standards for Hazardous Air Pollutants"; or
 - b) Other testing, monitoring, or information gathering methods, if approved by the Director, that produce information comparable to that produced by any method listed above.

40 CFR Part 82 Protection of Stratospheric Ozone (Title VI)

- 1) The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
 - a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to 40 CFR §82.106.

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- b) The placement of the required warning statement must comply with the requirements of 40 CFR §82.108.
 - c) The form of the label bearing the required warning statement must comply with the requirements of 40 CFR §82.110.
 - d) No person may modify, remove, or interfere with the required warning statement except as described in 40 CFR §82.112.
- 2) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B of 40 CFR Part 82:
 - a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices described in 40 CFR §82.156.
 - b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment described in 40 CFR §82.158.
 - c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR §82.161.
 - d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with the record keeping requirements of 40 CFR §82.166. ("MVAC-like" appliance as defined at 40 CFR §82.152).
 - e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to 40 CFR §82.156.
 - f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR §82.166.
 - 3) If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.
 - 4) If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements contained in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.
 - 5) The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program. *Federal Only - 40 CFR Part 82.*

V. General Permit Requirements

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

Permit Duration and Extension of Expired Permits

10 CSR 10-6.065(5)(C)1.B, 10 CSR 10-6.065(5)(E)3.C

This permit is issued for a term of five years, commencing on the date of issuance. This permit will expire at the end of this period unless renewed. If a timely and complete application for a permit renewal is submitted, but the Air Pollution Control Program fails to take final action to issue or deny the renewal permit before the end of the term of this permit, this permit shall not expire until the renewal permit is issued or denied.

General Record Keeping and Reporting Requirements

10 CSR 10-6.065(5)(C)1.C

- 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 available within a reasonable period of time to any Missouri Department of Natural Resources' personnel upon request.
- 2) Reporting
 - a) All reports shall be submitted to the Air Pollution Control Program, Compliance and Enforcement Section, P. O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov.
 - b) The permittee shall submit a report of all required monitoring by:
 - i) October 1st for monitoring which covers the January through June time period, and
 - ii) April 1st for monitoring which covers the July through December time period.
 - c) Each report shall identify any deviations from emission limitations, monitoring, record keeping, reporting, or any other requirements of the permit, this includes deviations or Part 64 exceedances.
 - d) Submit supplemental reports as required or as needed. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
 - i) Notice of any deviation resulting from an emergency (or upset) condition as defined in paragraph (5)(C)7.A of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two working days after the date on which the emission limitation is exceeded due to the emergency, if the permittee wishes to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and the permittee can identify the cause(s) of the emergency. The permitted installation must show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or requirements in the permit. The notice

- must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.
- ii) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.
 - iii) Any other deviations identified in the permit as requiring more frequent reporting than the permittee's semiannual report shall be reported on the schedule specified in this permit.
- e) Every report submitted shall be certified by the responsible official, except that, if a report of a deviation must be submitted within ten days after the deviation, the report may be submitted without a certification if the report is resubmitted with an appropriate certification within ten days after that, together with any corrected or supplemental information required concerning the deviation.
- f) The permittee may request confidential treatment of information submitted in any report of deviation.

Risk Management Plan Under Section 112(r)

10 CSR 10-6.065(5)(C)1.D

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

Severability Clause

10 CSR 10-6.065(5)(C)1.F

In the event of a successful challenge to any part of this permit, all uncontested permit conditions shall continue to be in force. All terms and conditions of this permit remain in effect pending any administrative or judicial challenge to any portion of the permit. If any provision of this permit is invalidated, the permittee shall comply with all other provisions of the permit.

General Requirements

10 CSR 10-6.065(5)(C)1.G

- 1) The permittee must comply with all of the terms and conditions of this permit. Any noncompliance with a permit condition constitutes a violation and is grounds for enforcement action, permit termination, permit revocation and re-issuance, permit modification or denial of a permit renewal application.
- 2) The permittee may not use as a defense in an enforcement action that it would have been necessary for the permittee to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit
- 3) The permit may be modified, revoked, reopened, reissued or terminated for cause. Except as provided for minor permit modifications, the filing of an application or request for a permit modification, revocation and reissuance, or termination, or the filing of a notification of planned changes or anticipated noncompliance, does not stay any permit condition.
- 4) This permit does not convey any property rights of any sort, nor grant any exclusive privilege.
- 5) The permittee shall furnish to the Air Pollution Control Program, upon receipt of a written request and within a reasonable time, any information that the Air Pollution Control Program reasonably may require to determine whether cause exists for modifying, reopening, reissuing or revoking the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the Air Pollution Control Program copies of records required to be kept by the permittee. The permittee may make a claim of confidentiality for any information or records submitted pursuant to 10 CSR 10-6.065(5)(C)1.

Incentive Programs Not Requiring Permit Revisions

10 CSR 10-6.065(5)(C)1.H

No permit revision will be required for any installation changes made under any approved economic incentive, marketable permit, emissions trading, or other similar programs or processes provided for in this permit.

Reasonably Anticipated Operating Scenarios

10 CSR 10-6.065(5)(C)1.I

There are no reasonably anticipated operating scenarios.

Compliance Requirements

10 CSR 10-6.065(5)(C)3

- 1) Any document (including reports) required to be submitted under this permit shall contain a certification signed by the responsible official.
- 2) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized officials of the Missouri Department of Natural Resources, or their authorized agents, to perform the following (subject to the installation's right to seek confidential treatment of information submitted to, or obtained by, the Air Pollution Control Program):
 - a) Enter upon the premises where a permitted installation is located or an emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
 - b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - c) Inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
 - d) As authorized by the Missouri Air Conservation Law, Chapter 643, RSMo or the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the terms of this permit, and all applicable requirements as outlined in this permit.
- 3) All progress reports required under an applicable schedule of compliance shall be submitted semiannually (or more frequently if specified in the applicable requirement). These progress reports shall contain the following:
 - a) Dates for achieving the activities, milestones or compliance required in the schedule of compliance, and dates when these activities, milestones or compliance were achieved, and
 - b) An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measures adopted.
- 4) The permittee shall submit an annual certification that it is in compliance with all of the federally enforceable terms and conditions contained in this permit, including emissions limitations, standards, or work practices. These certifications shall be submitted annually by April 1st, unless the applicable requirement specifies more frequent submission. These certifications shall be submitted to the Missouri Compliance Coordinator, Air Branch, Enforcement and Compliance Assurance Division, EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, as well as the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov. All deviations and Part 64 exceedances and excursions must be included in the compliance certifications. The compliance certification shall include the following:
 - a) The identification of each term or condition of the permit that is the basis of the certification;

- b) The current compliance status, as shown by monitoring data and other information reasonably available to the installation;
- c) Whether compliance was continuous or intermittent;
- d) The method(s) used for determining the compliance status of the installation, both currently and over the reporting period; and
- e) Such other facts as the Air Pollution Control Program will require in order to determine the compliance status of this installation.

Permit Shield

10 CSR 10-6.065(5)(C)6

- 1) Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements as of the date that this permit is issued, provided that:
 - a) The applicable requirements are included and specifically identified in this permit, or
 - b) The permitting authority, in acting on the permit revision or permit application, determines in writing that other requirements, as specifically identified in the permit, are not applicable to the installation, and this permit expressly includes that determination or a concise summary of it.
- 2) Be aware that there are exceptions to this permit protection. The permit shield does not affect the following:
 - a) The provisions of section 303 of the Act or section 643.090, RSMo concerning emergency orders,
 - b) Liability for any violation of an applicable requirement which occurred prior to, or was existing at, the time of permit issuance,
 - c) The applicable requirements of the acid rain program,
 - d) The authority of the Environmental Protection Agency and the Air Pollution Control Program of the Missouri Department of Natural Resources to obtain information, or
 - e) Any other permit or extra-permit provisions, terms or conditions expressly excluded from the permit shield provisions.

Emergency Provisions

10 CSR 10-6.065(5)(C)7

- 1) An emergency or upset as defined in 10 CSR 10-6.065(5)(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.

Operational Flexibility

10 CSR 10-6.065(5)(C)8

An installation that has been issued a Part 70 operating permit is not required to apply for or obtain a permit revision in order to make any of the changes to the permitted installation described below if the changes are not Title I modifications, the changes do not cause emissions to exceed emissions allowable under the permit, and the changes do not result in the emission of any air contaminant not previously emitted. The permittee shall notify the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov, as well as Missouri Compliance Coordinator, Air Branch, Enforcement and Compliance Assurance Division, EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, at least seven days in advance of these changes, except as allowed for emergency or upset conditions. Emissions allowable under the permit means a federally enforceable permit term or condition determined at issuance to be required by an applicable requirement that establishes an emissions limit (including a work practice standard) or a federally enforceable emissions cap that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject.

- 1) Section 502(b)(10) changes. Changes that, under section 502(b)(10) of the Act, contravene an express permit term may be made without a permit revision, except for changes that would violate applicable requirements of the Act or contravene federally enforceable monitoring (including test methods), record keeping, reporting or compliance requirements of the permit.
 - a) Before making a change under this provision, The permittee shall provide advance written notice to the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov, as well as Missouri Compliance Coordinator, Air Branch, Enforcement and Compliance Assurance Division, EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, describing the changes to be made, the date on which the change will occur, and any changes in emission and any permit terms and conditions that are affected. The permittee shall maintain a copy of the notice with the permit, and the APCP shall place a copy with the permit in the public file. Written notice shall be provided to the EPA and the APCP as above at least seven days before the change is to be made. If less than seven days notice is provided because of a need to respond more quickly to these unanticipated conditions, the permittee shall provide notice to the EPA and the APCP as soon as possible after learning of the need to make the change.
 - b) The permit shield shall not apply to these changes.

Off-Permit Changes

10 CSR 10-6.065(5)(C)9

- 1) Except as noted below, the permittee may make any change in its permitted operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Insignificant activities listed in the permit, but not otherwise addressed in or prohibited by this permit, shall not be considered to be constrained by this permit for purposes of the off-permit provisions of this section. Off-permit changes shall be subject to the following requirements and restrictions:
 - a) The change must meet all applicable requirements of the Act and may not violate any existing permit term or condition; the permittee may not change a permitted installation without a permit revision if this change is subject to any requirements under Title IV of the Act or is a Title I modification;
 - b) The permittee must provide contemporaneous written notice of the change to the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO

65102 or AirComplianceReporting@dnr.mo.gov, as well as Missouri Compliance Coordinator, Air Branch, Enforcement and Compliance Assurance Division, EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219. This notice shall not be required for changes that are insignificant activities under 10 CSR 10-6.065(5)(B)3 of this rule. This written notice shall describe each change, including the date, any change in emissions, pollutants emitted and any applicable requirement that would apply as a result of the change.

- c) The permittee shall keep a record describing all changes made at the installation that result in emissions of a regulated air pollutant subject to an applicable requirement and the emissions resulting from these changes; and
- d) The permit shield shall not apply to these changes.

Responsible Official

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

The application utilized in the preparation of this permit was signed by Joseph P. DeManche. On November 7, 2019, the Air Pollution Control Program was informed that Nathan W. Hall is now the responsible official. If this person terminates employment, or is reassigned different duties such that a different person becomes the responsible person to represent and bind the installation in environmental permitting affairs, the owner or operator of this air contaminant source shall notify the Director of the Air Pollution Control Program of the change. Said notification shall be in writing and shall be submitted within 30 days of the change. The notification shall include the name and title of the new person assigned by the source owner or operator to represent and bind the installation in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible person that were used in the establishment of limiting permit conditions on this permit will continue to be binding on the installation until such time that a revision to this permit is obtained that would change said representations, agreements and covenants.

Reopening-Permit for Cause

10 CSR 10-6.065(5)(E)6

This permit shall be reopened for cause if:

- 1) The Missouri Department of Natural Resources (MoDNR) receives notice from the Environmental Protection Agency (EPA) that a petition for disapproval of a permit pursuant to 40 CFR § 70.8(d) has been granted, provided that the reopening may be stayed pending judicial review of that determination,
 - 2) MoDNR or EPA determines that the permit contains a material mistake or that inaccurate statements were made which resulted in establishing the emissions limitation standards or other terms of the permit,
 - 3) Additional applicable requirements under the Act become applicable to the installation; however, reopening on this ground is not required if—:
 - a) The permit has a remaining term of less than three years;
 - b) The effective date of the requirement is later than the date on which the permit is due to expire;or
 - c) The additional applicable requirements are implemented in a general permit that is applicable to the installation and the installation receives authorization for coverage under that general permit,
 - 4) The installation is an affected source under the acid rain program and additional requirements (including excess emissions requirements), become applicable to that source, provided that, upon approval by EPA, excess emissions offset plans shall be deemed to be incorporated into the permit;
- or

- 5) MoDNR or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

Statement of Basis

10 CSR 10-6.065(5)(E)1.C

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

VI. Attachments

Attachments follow.

Attachment B

Monthly NOx Emission Tracking

This attachment is for the month of _____ in the year _____.

Emission Source	Monthly Throughput	Emission Factor⁶	Emission Factor Source	Monthly NOx Emissions⁷ (tons)
EP1 Engine 1	hrs operation	*	Emission Factor based of NOx Performance Test	
EP2 Engine 2	hrs operation	*		
EP3 Engine 3	hrs operation	*		
EP4 TSA Flare	MMdscf	39 lb/MMdscf of methane	Table 2.4-3 of Draft AP-42 Section 2.4	
NOx Emissions from Startup, Shutdown, and Malfunction				
Total Monthly NOx Emissions⁸ (tons):				
12-Month Consecutive Total of NOx Emissions⁹ (tons):				

⁶ The emission factor developed from the NOx performance test will be used to determine compliance with the 40 ton/year limitation as specified in construction permit 032008-010.

⁷ [Monthly NOx Emissions] = [Monthly Throughput] × [Emission Factor] / [2000 lb/ton]

⁸ Sum of Monthly NOx Emissions. The permittee should include SSM emissions per 10 CSR 10-6.050 as reported to the Compliance and Enforcement Section.

⁹ Sum of the most recent 12 months of Monthly NOx Emissions. **A value of less than 40 tons/year NOx indicates compliance with Permit Condition PW001.**

STATEMENT OF BASIS

INSTALLATION DESCRIPTION

Power Generation Facility:

Ameresco Jefferson City LLC owns and operates a renewable power generation source, on land leased from the Missouri Department of Corrections at the Jefferson City Correctional Center (JCCC). The permittee has leased 0.8 acres of existing property from the prison for the generator sets. Landfill gas is used to fuel three General Electric model JMS 320 reciprocating internal combustion engines, each rated at 1,470 brake horsepower (bhp) of mechanical output at full load with a maximum hourly heat input of approximately 10 MMBtu/hr. Each engine is equipped with a heat recovery steam generator (HRSG) that provides steam and hot water to the prison. Each HRSG is equipped with a bypass duct that allows the operator to control the flow of exhaust to each unit. The exhaust passes through a silencer before being released to the atmosphere. Ameresco receives untreated LFG from Jefferson City Landfill (JCL). The three engines are subject to 40 CFR Part 63 Subpart ZZZZ. A Part 70 Operating Permit is required because the potential emissions of CO and HAPs are above major levels.

Landfill Gas Treatment Facility:

Ameresco owns and operates a gas treatment system as well as a gas conditioning system at the JCL to prepare the LFG for use in the engines. The conditioning system removes siloxanes, a class of organosilicon compounds that can lead to abrasive deposits on pistons and cylinder heads and damage the engines. The landfill gas treatment system, consisting of blowers, dehydration skid, and filters, is identified as Emission Points EP4 and EP5 for the purpose of distinguishing equipment for NSPS and MACT applicability in this permit. Since the release of landfill gas via an emergency relief valve on this equipment is a rare occurrence and small in quantity emissions from Emission Point EP5 will not be reported in Ameresco's emission inventory.

The permittee uses a regenerative thermal swing adsorption (TSA) unit as the gas conditioning system. The TSA unit consists of two twin adsorber units, a condensate collection tank, a control panel, and a landfill gas open flare. The activated carbon in each adsorber unit is regenerated by taking the adsorber unit offline, heating it to drive off captured VOCs and flushing it with dewatered and filtered LFG. The flushed gas is then sent to the flare for destruction. The flare is rated at 300 cfm. The gas dehydration, filters, and conditioning system are considered to be a treatment system for the LFG and the treatment process is regulated as a landfill control device under 40 CFR Part 60 Subpart WWW Standards of Performance for Municipal Solid Waste Landfills and 40 CFR Part 63 Subpart AAAA National Emission Standards for Hazardous Air Pollutants: Municipal Solid Waste Landfills. After passing through the TSA, the scrubbed LFG fuel gas is transferred via a 3.5-mile pipeline from the landfill to the JCCC.

Ameresco is considered to be a separate installation from either the Jefferson City Landfill (JCL) (051-0058) or the JCCC (051-0066). Regarding the JCL, the permittee meets two of the criteria of the definition of "installation" but does not meet the requirement of being under common control. The two entities are under different ownership, and do not have access to each other's emission units or control devices. In regard to the JCCC, the determination is based on electricity being the primary product of the generators and the ability of JCCC to provide its own needs for steam and hot water. JCCC has boilers and emergency generators to generate their own power, steam, and hot water.

The Environmental Protection Agency, during their review of the draft permit renewal, indicated that disaggregation of Ameresco’s gas treatment system and flare located at JCL and their engines located at JCCC may be possible based on the approximant three mile geographical separation between the two sources. In a letter dated March 24, 2020 Ameresco requested to remain a single installation for the purposes of Part 70 applicability. Since this is the more conservative approach for emissions tracking and reporting purposes The Air Pollution Control Program did not make a determination of disaggregation applicability and Ameresco Jefferson City LLC will remain one installation.

Updated Potential to Emit (PTE) and Reported Air Pollutant Emissions, tons per year

Pollutants	PTE ¹⁰	Reported				
		2018	2017 ¹¹	2016	2015	2014
Particulate Matter ≤ Ten Microns (PM ₁₀)	2.51	1.92	1.92	6.03	6.21	5.67
Particulate Matter ≤ 2.5 Microns (PM _{2.5})	2.51	1.92	1.92	5.92	6.09	5.66
Sulfur Oxides (SO _x)	27.42	7.32	7.35	3.50	2.51	2.78
Nitrogen Oxides (NO _x)	< 40	13.63	21.33	26.78	26.76	21.03
Volatile Organic Compounds (VOC)	55.03	3.27	5.33	25.93	30.29	1.76
Carbon Monoxide (CO)	215.38	69.78	96.23	123.53	98.65	112.21
Hazardous Air Pollutants (HAPs)	15.55	12.55	13.08	0.62	0.64	0.08
Formaldehyde (50-00-0)	12.43	10.74	10.92	-	-	-
Hydrogen Chloride (7647-01-0)	2.17	0.91	1.54	-	-	-

Permit Reference Documents

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

- 1) Part 70 Operating Permit Application, received March 26, 2018;
- 2) 2017 Emissions Inventory Questionnaire, received March 13, 2018;
- 3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition;

¹⁰ Each emission unit was evaluated at 8,760 hours of uncontrolled annual operation unless otherwise noted. PTE is not scaled based on the NOx limitation. PTE was evaluated at MHDR and calculated using draft AP-42 Section 2.4 emission factors and destruction efficiencies for individual pollutants. NOx, VOC, and CO PTE emissions for the engines are derived from the applicable NSPS JJJJ limitation for each of those pollutants. Formaldehyde emission factor was created from a compilation of test data from 34 different landfills. This PTE has been updated from the PTE listed in the construction permits which uses the older final AP-42 Section 2.4 which does not include emission factors for formaldehyde.

¹¹ 2017 EIQ has been modified and updated with new calculation methodology that more accurately reflects actual emissions..

- 4) WebFIRE;
- 5) All construction permits listed in the Construction Permit History section;
- 6) Ameresco's letter dated March 24, 2020 requesting to remain a single facility

Construction Permit History

Construction Permit 022007-008, issued February 13, 2007

This permit was issued for the installation of a gas conditioning system for removing organic compounds and siloxanes from landfill gas and three reciprocating internal combustion engines each equipped with a 1060 kW generator. The engines are fueled solely by landfill gas from the Jefferson City Landfill. In addition, each engine is equipped with a heat recovery steam generator that will provide steam. All special conditions have been superseded by Construction Permit 032008-010.

Construction Permit 032008-010, issued March 21, 2008

The design for the gas conditioning system changed before it was installed so the permittee applied for a new construction permit for the redesigned project.

This permit was issued for the installation of a gas conditioning system including a thermal swing adsorption unit with open flare and three reciprocating internal combustion engines each equipped with a 1060 kW generator. The engines are fueled solely by treated landfill gas from the Jefferson City Landfill. In addition, each engine is equipped with a heat recovery steam generator that will provide steam. It contains three special conditions. An amendment was issued in 2017 which updates CO emission factors after performance testing.

- Special Condition 1 supersedes all special conditions in Construction Permit 022007-008.
- Special Condition 2 contains a NO_x emission limitation for the entire installation which has been incorporated into the operating permit.
- Special Condition 3 contains conditions for stack testing to confirm emission factors for CO and NO_x. The permittee has tested as required on 4/16/09; because this condition was satisfied, it was not incorporated into the operating permit.

Construction Permit 032008-010A, issued December 20, 2017

The testing required in Special Condition 3 of Construction Permit 032008-010 was performed using Engine #3. Engine #3 burned landfill gas for the testing at three load settings: 50%, 70%, and 100% of design output and CO and NO_x emissions were evaluated. This tests showed an exceedance of the CO emission factor thus, requiring Ameresco to apply for an amendment to Construction Permit 032008-010. Amendment 032008-010A established a revised landfill gas potential emission factor of 5 grams of CO per brake horsepower.

Missouri Code of State Regulations (CSR) Applicability

10 CSR 10-6.100, *Alternate Emission Limits*

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

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

This rule does not apply. The engines are exempt per (1)(A) due to being internal combustion engines. The TSA Flare is exempt per (1)(L) due to being fired with landfill gas.

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

This rule applies. Conditions requiring sulfur content testing of landfill gas and material balance calculations for SO₂ are included in the permit.

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

This rule applies; however, it has not been applied within the operating permit. There are no applicable fuel sulfur limitations that apply to landfill gas in the rule.

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

This rule does not apply. None of the emission sources meet the definition of 'process weight' in 10 CSR 10-6.020 and thus this process weight rule is not applicable. The definition of process weight specifically excludes liquid and gas fuels for purposes of combustion.

10 CSR 10-6.405, *Restriction of Particulate Matter Emissions From Fuel Burning Equipment Used For Indirect Heating*

This rule does not apply because none of the emission sources are indirect heating units.

New Source Performance Standards (NSPS) Applicability

40 CFR Part 60, Subpart WWW – *Standards of Performance for Municipal Solid Waste Landfills*

The installation is subject to this regulation because it uses the landfill gas from a landfill which is subject to this regulation. The landfill has exceeded the 50 Mg/yr threshold and has installed an open flare to control emissions. The JCL has control of the landfill gas collection and control system (GCCS); as a result, the conditions for the GCCS in this subpart were not included in this operating permit. These conditions can instead be found in JCL's most recent operating permit.

In an email from Andrew McClelland on November 7, 2019, he confirms that Ameresco receives untreated landfill gas from JCL and is responsible for the treatment of the landfill gas for subsequent use. Ameresco operates a treatment system that filters, dehydrates, and compresses the landfill gas to comply with 60.752(b)(2)(iii)(C). This treatment system has a relief valve that only vents to atmosphere during a malfunction. Since the relief valve only operates during periods of malfunction, releases from the vent are subject to §60.755(e) and not subject to the combusting or flaring requirements of 60.752(b)(2)(iii)(A) or 60.752(b)(2)(iii)(B). Therefore, the applicable regulations appear in the operating permit.

In an email from Andrew McClelland on November 8, 2019, he explains that the gas used in the temperature swing adsorption unit and combusted by the temperature swing adsorption flare is treated landfill gas. Also, no vents on the landfill gas treatment system are ducted to the temperature swing adsorption flare. Thus, there are no applicable requirements of NSPS WWW for the temperature swing adsorption flare.

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

The engines were manufactured in May 2007, and constructed on January 22, 2009. They are located at a major source of HAP, and are rated at 1470 brake horsepower. They are not certified engines and require regular retesting.

According to §60.4230(a)(6) the provisions of §60.4236 apply to all owners and operators of stationary SI ICE that commence construction after June 12, 2006. §60.4236 states that after July 1, 2009 owners cannot install SI ICE that are larger than 500 HP that do not meet the emission standards in §60.4233. §60.4233(e) states that all SI ICE with greater than or equal to 100 HP must comply with the emission standards in Table 1. Therefore, these standards appear in the operating permit.

The most recent testing was done on April 10 through April 11, 2019 in order to demonstrate compliance with the ppm_{vd} at 15% O₂ emission standards in 40 CFR Part 60, Subpart JJJJ for landfill gas. The results are as follows:

Landfill Gas			
Engine	Pollutant	Results (ppm _{vd} at 15% O ₂)	Subpart JJJJ Limit (ppm _{vd} at 15% O ₂)
EP1 - Engine 1	NO _x	25.7	160
	CO	232.5	540
	VOC	7.2 (as propane)	86
EP2 - Engine 2	NO _x	27.5	160
	CO	228.8	540
	VOC	6.7 (as propane)	86
EP3 - Engine 3	NO _x	28.8	160
	CO	236.3	540
	VOC	7.4 (as propane)	86

Maximum Achievable Control Technology (MACT) Applicability

40 CFR Part 63, Subpart AAAA – *National Emission Standards for Hazardous Air Pollutants: Municipal Solid Waste Landfills*

This subpart applies and has been incorporated into the operating permit. Compliance with this regulation is demonstrated by maintaining compliance with 40 CFR Part 60 Subpart WWW and an SSM plan.

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

This subpart is applicable. However, the facility is in compliance with this subpart if the permittee is in compliance with 40 CFR Part 60, Subpart JJJJ. Since NSPS JJJJ has been applied within this operating permit, MACT ZZZZ was not included.

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

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

involve any asbestos containing materials, the installation must follow all of the applicable requirements of the above rules related to that specific project.

Compliance Assurance Monitoring (CAM) Applicability

These units are exempt from CAM because they are subject to MACT and NSPS standards that were proposed after November 15, 1990, see 40 CFR Part 64(b)(1)(i).

Greenhouse Gas Emissions

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

Other Regulatory Determinations

None.

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

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

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

Should a later determination conclude that the installation is subject to one or more of the regulations cited in this Statement of Basis or other regulations which were not cited, the installation shall determine and demonstrate, to the ACP'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 ACP a schedule for achieving compliance for that regulation(s).

Response to Public Comments

The draft Part 70 Operating Permit for Ameresco Jefferson City, LLC was placed on public notice December 20, 2019 for a 30-day comment period. The public notice was published on the Department of Natural Resources' Air Pollution Control Program's web page at: <https://dnr.mo.gov/env/apcp/permit-public-notice.htm>. Three comments were received from Amy Algoe-Eakin, EPA Region 7 on January 10, 2020. The comments are addressed in the order in which they appear within the letter.

Comment 1 EPA Region 7: Based on the Installation Description on the front page of the draft Part 70 Permit to Operate and in the Statement of Basis, Ameresco owns and operates a renewable power generation facility on land leased from the Missouri Department of Corrections at the Jefferson City Correctional Center. Additionally, it appears that Ameresco owns the dewatering and filtration equipment and a regenerative conditioning system, including a flare to control the system gas from the regenerative condition system which is located at the existing Jefferson City municipal solid waste landfill. Ameresco's draft Part 70 Permit to Operate lists five emission units which included three reciprocating internal combustion engines, one temperature swing adsorption flare and one landfill gas treatment system.

The draft Part 70 Permit to Operate includes Permit Condition 001 where the MoDNR incorporates applicable requirements from 40 CFR Part 60, Subpart WWW, *Standards of Performance for Municipal Solid Waste Landfills*, and Permit Condition 002 where the MoDNR incorporates applicable requirements from 40 CFR Part 63, Subpart AAAA, *National Emission Standards for Hazardous Air Pollutants: Municipal Solid Waste Landfills*. 40 CFR Part 60, Subpart WWW is applicable to each municipal solid waste landfill defined as an entire disposal facility in a contiguous geographical space where household waste is placed in or on the land. Similarly, 40 CFR Part 63, Subpart AAAA is applicable if you "own or operate" a municipal solid waste landfill that has accepted new wastes since November 8, 1987, and 40 CFR Part 63, Subpart AAAA defines municipal solid waste landfill as an entire disposal facility in a contiguous geographical space where household waste is placed in or on the land. Ameresco is identified as a "renewable power generation facility" and not as a "municipal solid waste landfill." It appears the requirements in both Permit Condition 001 and Permit Condition 002 are not applicable. Therefore, the EPA recommends the MoDNR consider the appropriateness of including municipal solid waste landfill requirements in an operating permit for three reciprocating internal combustions engines, a temperature swing adsorption flare and a landfill gas treatment system.

Missouri Air Pollution Control Program Response to Comment: The regulations at 40 CFR Part 60.752(b)(2)(iii) state that collected landfill gas is required to be routed to a control system that complies with the requirements in either: A) an open flare; B) a control system or enclosed combustor designed to reduce NMOC; or C) a treatment system that processes the collected gas for subsequent sale or use. The Federal Register Proposed Rule Amendments clarify that once the landfill gas is treated, the facilities that buy or use the gas have no further obligations related to the NSPS. However, emissions from any atmospheric vent from the gas treatment system are subject to the requirements of 40 CFR 60.752(b)(2)(iii)(A) and (B).

In an email received from Andrew McClelland, Ameresco Jefferson City, LLC on November 7, 2019, he confirms that Ameresco Jefferson City, LLC owns and operates the landfill gas treatment system consisting of dewatering and filtration. Jefferson City Landfill meets the regulations of 40 CFR

60.752(b)(2)(iii) for the portion of collected landfill gas not sent to Ameresco Jefferson City, LLC by flaring the gas in an open flare. However, the landfill gas received by Ameresco Jefferson City, LLC is not treated, and the regulations of 40 CFR 60.752(b)(2)(iii) are not met until the landfill gas is processed through Ameresco Jefferson City, LLC's gas treatment system. Thus in the draft Part 70 Permit to Operate applicable requirements from 40 CFR Part 60, Subpart W and 40 CFR Part 63, Subpart AAAA were included for EP5 the Landfill Gas Treatment System.

Clarification of Ameresco Jefferson City, LLC's ownership and operation of the gas treatment system provided in the email from Andrew McClelland has been added to the Statement of Basis.

Comment 2 EPA Region 7: The temperature swing adsorption flare used to control purge gas from the landfill gas treatment system may be subject to the requirement pursuant to 40 CFR Part 60, Subpart A, paragraph 18 (§60.18), and as such, the applicable requirements in §60.18 should be considered for inclusion within this Part 70 Permit to Operate. The EPA encourages the MoDNR to consider undertaking a determination of the appropriateness of flare requirements in §60.18. The MoDNR is encouraged to document their determination in the Statement of Basis.

Missouri Air Pollution Control Program Response to Comment: In an email received from Andrew McClelland, Ameresco Jefferson City LLC on November 8, 2019, he explains that the temperature swing adsorption unit consists of tanks of carbon media that removes siloxanes from the landfill gas. Once the carbon media is saturated, it is regenerated by heating (electric) and then the contaminants that are driven off the carbon media are purged from the tank with treated landfill gas and sent to the flare for destruction.

40 CFR Part 60, Subpart A, paragraph 18(a)(1) (§60.18(a)(1)) states: This section contains requirements for control devices used to comply with applicable subparts of 40 CFR parts 60 and 61. The requirements are placed here for administrative convenience and apply only to facilities covered by subparts referring to this section.

Since Ameresco Jefferson City, LLC uses EP5 the Landfill Gas Treatment System to meet the gas treatment conditions of NSPS W and MACT AAAA, subsequent usage of this gas is no longer subject to the requirements of the NSPS and MACT. The gas used in the temperature swing adsorption unit and combusted by the temperature swing adsorption flare is treated landfill gas and is not subject to the requirements of NSPS W and MACT AAAA. Since 40 CFR Part 60, Subpart W does not apply to the temperature swing adsorption flare 40 CFR §60.18 does not apply.

Clarification of Ameresco Jefferson City, LLC's use of treated landfill gas in the temperature swing adsorption flare provided in the email from Andrew McClelland has been added to the Statement of Basis.

Comment 3 EPA Region 7: Permit Condition 003 incorporates requirements from 40 CFR Part 60, Subpart JJJJ, Standards of Performance for Stationary Spark Ignition Internal Combustion Engines, applicable to Emission Units EPI, EP2 and EP3. Compliance requirement 1) b) in Permit Condition 003 requires subsequent performance testing every 8,760 hours of operation or every 3 years, whichever comes first, to demonstrate compliance. Footnote 4 indicates that as of the issuance of this permit, the most recent testing occurred on April 10-11, 2019, and demonstrated compliance with results in the Statement of Basis. However, the Statement of Basis says the most recent testing under 40 CFR Part 60,

Subpart JJJJ was done on March 17, 2018, in order to demonstrate compliance. The EPA suggests the MoDNR consider accurately matching the dates presented in Footnote 4, of Permit Condition 003, with the Statement of Basis.

Missouri Air Pollution Control Program Response to Comment: The engine test date in the Statement of Basis has been corrected.



Missouri Department of dnr.mo.gov

NATURAL RESOURCES

Michael L. Parson, Governor

Carol S. Comer, Director

June 4, 2020

Joseph P. DeManche
Ameresco Jefferson City, LLC
8432 No More Victims Rd.
Jefferson City, MO 65101

Re: Renewal of Part 70 Operating Permit
Installation ID: 051-0075, Permit Number: OP2020-003

Dear Joseph DeManche:

Enclosed with this letter is the renewal of your Part 70 operating permit. Please review this document carefully. Operation of your installation in accordance with the rules and regulations cited in this document is necessary for continued compliance. It is very important that you read and understand the requirements contained in your permit.

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

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

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

Sincerely,

AIR POLLUTION CONTROL PROGRAM

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

MJS:jra

Enclosures

c: PAMS File: 2018-03-051

