



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: OP2017-001
Expiration Date: JAN 26 2022
Installation ID: 033-0022
Project Number: 2014-07-031

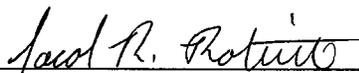
Installation Name and Address

Carrollton Municipal Utilities
520 Waterworks
Carrollton, MO 64633
Carrollton County

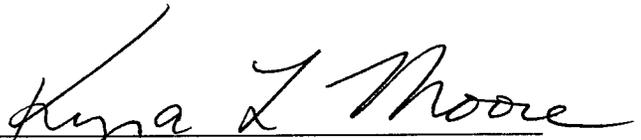
Installation Description:

Carrollton Municipal Utilities operates as an emergency backup plant to generate electric power for consumption when necessary. The facility consists of one diesel generator and five dual fuel generators, and several fuel oil storage tanks.

The installation is not a named source and is a major source for Nitrogen Oxides (NO_x).



Prepared by
Jacob Robinett
Operating Permit Unit



Director or Designee
Department of Natural Resources

JAN 26 2017

Effective Date

Table of Contents

I. INSTALLATION EQUIPMENT LISTING	3
EMISSION UNITS WITH LIMITATIONS	3
EMISSION UNITS WITHOUT SPECIFIC LIMITATIONS	3
II. PLANT WIDE EMISSION LIMITATIONS.....	4
III. EMISSION UNIT SPECIFIC EMISSION LIMITATIONS	5
PERMIT CONDITION 1	5
10 CSR 10-6.075 Maximum Achievable Control Technology Regulations and	5
40 CFR Part 63 Subpart A - General Provisions and	5
40 CFR Part 63 Subpart ZZZZ - National Emission Standard for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines	5
PERMIT CONDITION 2	10
10 CSR 10-6.075 Construction Permits Required.....	10
Construction Permit No. 072001-006, Issued July 5, 2001	10
IV. CORE PERMIT REQUIREMENTS	11
V. GENERAL PERMIT REQUIREMENTS.....	17
VI. ATTACHMENTS	23
ATTACHMENT A	24
Monthly NO _x Emission Tracking Record for EP30	24
ATTACHMENT B	25
Abbreviations and Acronyms	25

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.

<u>Emission Unit #</u>	<u>Description of Emission Unit</u>
E20	Enterprise Dual Fuel Generator, 6.2 MMBtu/hr, installed 1963, NG/diesel
E24	Nordberg Dual Fuel Generator, 8.5 MMBtu/hr, installed 1959, NG/diesel
E25	Enterprise Dual Fuel Generator, 14 MMBtu/hr, installed 1966, NG/diesel
E26	Enterprise Dual Fuel Generator, 14 MMBtu/hr, installed 1969, NG/diesel
E27	Enterprise Dual Fuel Generator, 21.5 MMBtu/hr, installed 1971, NG/diesel
E30	Onan Diesel Generator, 6.5 MMBtu, installed 2001, diesel

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.

<u>Description of Emission Source</u>
E06 12,100 gallon No. 2 Fuel oil storage tank
E07 20,000 gallon No. 2 Fuel oil storage tank
E08 260 gallon No. 2 Fuel oil storage tank
E09 260 gallon No. 2 Fuel oil storage tank
E10 260 gallon No. 2 Fuel oil storage tank
E11 340 gallon No. 2 Fuel oil storage tank
E12 370 gallon No. 2 Fuel oil storage tank
E13 520 gallon No. 2 Fuel oil storage tank
E14 390 gallon No. 2 Fuel oil storage tank
E15 380 gallon No. 2 Fuel oil storage tank
E16 1,000 gallon No. 2 Fuel oil storage tank
E17 350 gallon No. 2 Fuel oil storage tank
E28 Parts Cleaning
E29 Waste Water Treatment Chemicals
E31 7,000 gallon No. 2 Fuel oil storage tank
E32 20,000 gallon No. 2 Fuel oil storage tank

II. Plant Wide Emission Limitations

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

None.

III. Emission Unit Specific Emission Limitations

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

PERMIT CONDITION 1			
10 CSR 10-6.075 Maximum Achievable Control Technology Regulations and 40 CFR Part 63 Subpart A - General Provisions and 40 CFR Part 63 Subpart ZZZZ - National Emission Standard for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines			
EIQ Reference #	Description		Manufacturer/Model #
EP-20	Emergency Generator: 2447 hp dual fuel powered generator; MHDR 6.2 MMBtu/hr; installed 1963		Enterprise
EP-24	Emergency Generator: 3353 hp dual fuel powered generator; MHDR 8.5 MMBtu/hr; installed 1959		Nordberg
EP-25	Emergency Generator: 5498 hp dual fuel powered generator; MHDR 14 MMBtu/hr; installed 1966		Enterprise
EP-26	Emergency Generator: 5498 hp dual fuel powered generator; MHDR 14 MMBtu/hr; installed 1969		Enterprise
EP-27	Emergency Generator: 8448 hp dual fuel powered generator; MHDR 21.5 MMBtu/hr; installed 1971		Enterprise
EP-30	Emergency Generator: 2682 hp diesel powered generator; MHDR 6.5 MMBtu/hr; installed 2001		ONAN
Engine Category	Existing Emergency CI > 500 Hp	Monitoring, Installation, Collection, Operation and Maintenance Requirements	§63.6625(e)(3), (f), (h), (i)
Date Constructed	<i>Before 6/12/2006</i>	Initial Compliance	No Requirements
Compliance Date	May 3, 2013	Continuous Compliance	§63.6605, §63.6640(a) & (f)
Work Practice Standards	Table 2d of MACT ZZZZ, Item#4	Notification Requirements	No Requirements <i>per §63.6645(a)(5)</i>
Work Practice Standards	§63.6640(f)	Recordkeeping Requirements	§63.6655(e) & (f)
Fuel Requirements	§63.6604(b)	Reporting Requirements	§63.6640(b), Footnote 2 of Table 2d
Performance Tests	No Requirements	General Provisions (40 CFR part 63)	Yes, except per §63.6645(a)(5), the following do not apply: §63.7(b) and (c), §63.8(e), (f)(4) and (f)(6), and §63.9(b)-(e), (g) and (h).

Emission Limitation

1. The permittee must comply with the requirements in Table 2d of this permit condition. [§63.6603(a)]
2. Beginning January 1, 2015, the permittee must use diesel fuel that meets the requirements in 40 CFR 80.510(b) for nonroad diesel fuel, except that any existing diesel fuel purchased (or otherwise obtained) prior to January 1, 2015, may be used until depleted. [§63.6604(b)]
3. At all times the permittee must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require the permittee to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. [§63.6605(b)]
4. The permittee must minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the emission standards applicable to all times other than startup in Table 2d of this permit condition applies. [§63.6625(h)]
5. The permittee has the option of utilizing an oil analysis program in order to extend the specified oil change requirement in Tables 2d of this permit condition. The oil analysis must be performed at the same frequency specified for changing the oil in Table 2d to this subpart. The analysis program must at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Base Number is less than 30 percent of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the engine owner or operator is not required to change the oil. If any of the limits are exceeded, the permittee must change the oil within 2 business days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the engine owner or operator must change the oil within 2 business days or before commencing operation, whichever is later. The permittee must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine. [§63.6625(i)]

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

RICE Type	Emission Limitation
Emergency stationary CI RICE ²	Change oil and filter every 500 hours of operation or annually, whichever comes first; ¹
	Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and
	Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

¹Sources have the option to utilize an oil analysis program as described in §63.6625(i) in order to extend the specified oil change requirement in Table 2d of this subpart.

²If an emergency engine is operating during an emergency and it is not possible to shut down the engine in order to perform the management practice requirements on the schedule required in Table 2d of this subpart, or if performing the management practice on the required schedule would otherwise pose an unacceptable risk under federal, state, or local law, the management practice can be delayed until the emergency is over or the unacceptable risk under federal, state, or local law has abated. The management practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under federal, state, or local law has abated. The permittee must report any failure to perform the management practice on the schedule required and the federal, state or local law under which the risk was deemed unacceptable.

Operational Limitation:

1. The permittee must demonstrate continuous compliance with the emission limitation in Table 2d to this subpart according to methods specified in Table 6 of this permit condition. [§63.6640(a)]
2. The permittee must also report each instance in which the facility did not meet the requirements in the General Provisions of this permit. [§63.6640(e)]
3. The permittee must operate the emergency stationary RICE according to the requirements in paragraphs 3.A. through C. In order for the engine to remain an emergency stationary RICE, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year, as described in paragraphs 3.A. through C., is prohibited. If the permittee does not operate the engine according to the requirements in paragraphs 3.A. through C., the engine will not be considered an emergency engine and must meet all requirements for non-emergency engines. [§63.6640(f)]
 - A. There is no time limit on the use of emergency stationary RICE in emergency situations. [§63.6640(f)(1)]
 - B. The permittee may operate the emergency stationary RICE for any combination of the purposes specified in paragraphs 3.B.(i) through (iii) for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by paragraph 3.C counts as part of the 100 hours per calendar year allowed by this paragraph 3.B. [§63.6640(f)(2)]
 - (i) Emergency stationary RICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The permittee may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the permittee maintains records indicating that federal, state, or local standards require maintenance and testing of emergency RICE beyond 100 hours per calendar year. [§63.6640(f)(2)(i)]
 - (ii) Emergency stationary RICE may be operated for emergency demand response for periods in which the Reliability Coordinator under the North American Electric Reliability Corporation (NERC) Reliability Standard EOP-002-3, Capacity and Energy Emergencies (incorporated by reference, see §63.14), or other authorized entity as determined by the Reliability Coordinator, has declared an Energy Emergency Alert Level 2 as defined in the NERC Reliability Standard EOP-002-3. [§63.6640(f)(2)(ii)]
 - (iii) Emergency stationary RICE may be operated for periods where there is a deviation of voltage or frequency of 5 percent or greater below standard voltage or frequency. [§63.6640(f)(2)(iii)]
 - C. Emergency stationary RICE located at area sources of HAP may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in paragraph 3.B. Except as provided in paragraphs 3.C.(i), the 50 hours per year for non-emergency situations cannot be used for peak shaving or

- non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity. [§63.6640(f)(4)]
- (i) The 50 hours per year for non-emergency situations can be used to supply power as part of a financial arrangement with another entity if all of the following conditions are met: [§63.6640(f)(4)(ii)]
 - a. The engine is dispatched by the local balancing authority or local transmission and distribution system operator. [§63.6640(f)(4)(ii)(A)]
 - b. The dispatch is intended to mitigate local transmission and/or distribution limitations so as to avert potential voltage collapse or line overloads that could lead to the interruption of power supply in a local area or region. [§63.6640(f)(4)(ii)(B)]
 - c. The dispatch follows reliability, emergency operation or similar protocols that follow specific NERC, regional, state, public utility commission or local standards or guidelines. [§63.6640(f)(4)(ii)(C)]
 - d. The power is provided only to the facility itself or to support the local transmission and distribution system. [§63.6640(f)(4)(ii)(D)]
 - e. The permittee identifies and records the entity that dispatches the engine and the specific NERC, regional, state, public utility commission or local standards or guidelines that are being followed for dispatching the engine. The local balancing authority or local transmission and distribution system operator may keep these records on behalf of the engine owner or operator. [§63.6640(f)(4)(ii)(E)]
 - 4. The permittee shall install non-resettable hour meters on all emergency generators located at the facility.
 - 5. The facility shall operate as an emergency backup installation; any change to the operational type for the facility requires the installation of control devices prior to the change in operation.

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

Compliance Method	The permittee must demonstrate continuous compliance by . . .
Work or Management practices	1. Operating and maintaining the stationary RICE according to the manufacturer's emission-related operation and maintenance instructions; or 2. Develop and follow a maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.

Recordkeeping

- 1. The permittee must keep the records required in Table 6 to show continuous compliance. [§63.6655(d)]
- 2. The permittee must keep records of the maintenance conducted on the stationary RICE in order to demonstrate that the permittee operated and maintained the stationary RICE and after-treatment control device (if any) according to the permittee’s own maintenance plan. [§63.6655(e)]
- 3. The permittee must keep records of the hours of operation of the engines that is recorded on all of the non-resettable hour meters. The permittee must document how many hours are spent for

emergency operation; including what classified the operation as emergency and how many hours are spent for non-emergency operations. If the engines are used for the purposes specified in §63.6640(f)(2)(ii) or (iii) or §63.6640(f)(4)(ii), the permittee must keep records of the notification of the emergency situation, and the date, start time, and end time of engine operation for these purposes. [§63.6655(f)]

4. The permittee's records must be in a form suitable and readily available for expeditious review according to §63.10(b)(1). [§63.6660(a)]
5. The permittee must keep each record readily accessible in hard copy or electronic form for at least 5 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to §63.10(b)(1). [§63.6660(c)]

Reporting

1. The permittee must submit each report in Table 7 of this permit condition. [§63.6650(a)]
2. The permittee must submit an annual report according to the requirements in paragraphs 2.A through 2.C. [§63.6650(h)]
 - A. The report must contain the following information: [§63.6650(h)(1)]
 - (i) Company name and address where the engine is located. [§63.6650(h)(1)(i)]
 - (ii) Date of the report and beginning and ending dates of the reporting period. [§63.6650(h)(1)(ii)]
 - (iii) Engine site rating and model year. [§63.6650(h)(1)(iii)]
 - (iv) Latitude and longitude of the engine in decimal degrees reported to the fifth decimal place. [§63.6650(h)(1)(iv)]
 - (v) Hours operated for the purposes specified in §63.6640(f)(2)(ii) and (iii), including the date, start time, and end time for engine operation for the purposes specified in §63.6640(f)(2)(ii) and (iii). [§63.6650(h)(1)(v)]
 - (vi) Number of hours the engine is contractually obligated to be available for the purposes specified in §63.6640(f)(2)(ii) and (iii). [§63.6650(h)(1)(vi)]
 - (vii) Hours spent for operation for the purpose specified in §63.6640(f)(4)(ii), including the date, start time, and end time for engine operation for the purposes specified in §63.6640(f)(4)(ii). The report must also identify the entity that dispatched the engine and the situation that necessitated the dispatch of the engine. [§63.6650(h)(1)(vii)]
 - (viii) If there were no deviations from the fuel requirements in §63.6604 that apply to the engine (if any), a statement that there were no deviations from the fuel requirements during the reporting period. [§63.6650(h)(1)(viii)]
 - (ix) If there were deviations from the fuel requirements in §63.6604 that apply to the engine (if any), information on the number, duration, and cause of deviations, and the corrective action taken. [§63.6650(h)(1)(ix)]
 - B. The first annual report must cover the calendar year 2016 and must be submitted no later than March 31, 2017. Subsequent annual reports for each calendar year must be submitted no later than March 31 of the following calendar year. [§63.6650(h)(2)]
 - C. The annual report must be submitted electronically using the subpart specific reporting form in the Compliance and Emissions Data Reporting Interface (CEDRI) that is accessed through EPA's Central Data Exchange (CDX) (www.epa.gov/cdx). However, if the reporting form specific to this subpart is not available in CEDRI at the time that the report is due, the written report must be submitted to the Administrator at the appropriate address listed in §63.13. [§63.6650(h)(3)]

- The permittee shall report any deviations/exceedances of this permit condition using the semi-annual monitoring report and annual compliance certification to the Missouri Air Compliance Coordinator at EPA Region 7, 11201 Renner Road, Lenexa, KS 66219, as required by section V of this permit.

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

The report must contain. . .	The report must be submitted . . .
The information in §63.6650(h)(1)	annually according to the requirements in §63.6650(h)(2)-(3).

<p>PERMIT CONDITION 2 10 CSR 10-6.060 Construction Permits Required Construction Permit No. 072001-006, Issued July 5, 2001</p>
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Emission Point	Description	Manufacturer/Model #	Installation Date
EP-30	Emergency Generator: 2000 kW diesel powered generator; MHDR 6.5 MMBtu/hr	ONAN	2001

Emission Limitation:

The permittee shall not emit nitrogen oxides (NOx) from EP-30 in excess of 40 tons in any consecutive 12-month period. [Special Condition 1.A]

Monitoring/Recordkeeping:

- The permittee shall monitor and record monthly and cumulative 12-month total emissions of NOx. Attachment A or equivalent forms approved by the Air Pollution Control Program shall be used for record-keeping. [Special Condition 1.B]
- The permittee shall maintain all records required by this permit for not less than five (5) years and shall make them available immediately to any Missouri Department of Natural Resources’ personnel upon request.

Reporting:

- The permittee shall report to the Air Pollution Control Program’s Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the permittee determined that the emission unit(s) exceeded the emission limitations(s).
- The permittee shall report any deviations from the limitations, 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.

IV. Core Permit Requirements

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

10 CSR 10-6.045 Open Burning Requirements

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

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

- 1) In the event of a malfunction, which results in excess emissions that exceed one hour, the permittee shall submit to the director within two business days, in writing, the following information:
 - a) Name and location of installation;
 - b) Name and telephone number of person responsible for the installation;
 - c) Name of the person who first discovered the malfunction and precise time and date that the malfunction was discovered.
 - d) Identity of the equipment causing the excess emissions;
 - e) Time and duration of the period of excess emissions;
 - f) Cause of the excess emissions;
 - g) Air pollutants involved;
 - h) Best estimate of the magnitude of the excess emissions expressed in the units of the applicable requirement and the operating data and calculations used in estimating the magnitude;
 - i) Measures taken to mitigate the extent and duration of the excess emissions; and
 - j) Measures taken to remedy the situation that caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations.
- 2) The permittee shall submit the paragraph 1 information list to the director in writing at least ten days prior to any maintenance, start-up or shutdown, which is expected to cause an excessive release of emissions that exceed one hour. If notice of the event cannot be given ten days prior to the planned occurrence, it shall be given as soon as practicable prior to the release. If an unplanned excess release of emissions exceeding one hour occurs during maintenance, start-up or shutdown, the director shall be notified verbally as soon as practical during normal working hours and no later than the close of business of the following working day. A written notice shall follow within ten working days.
- 3) Upon receipt of a notice of excess emissions issued by an agency holding a certificate of authority under section 643.140, RSMo, the permittee may provide information showing that the excess emissions were the consequence of a malfunction, start-up or shutdown. The information, at a minimum, should be the paragraph 1 list and shall be submitted not later than 15 days after receipt of the notice of excess emissions. Based upon information submitted by the permittee or any other

pertinent information available, the director or the commission shall make a determination whether the excess emissions constitute a malfunction, start-up or shutdown and whether the nature, extent and duration of the excess emissions warrant enforcement action under section 643.080 or 643.151, RSMo.

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

10 CSR 10-6.060 Construction Permits Required

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

10 CSR 10-6.065 Operating Permits

The permittee shall file a complete application for renewal of this operating permit at least six months before the date of permit expiration. In no event shall this time be greater than eighteen months. [10 CSR 10-6.065(6)(B)1.A(V)] The permittee shall retain the most current operating permit issued to this installation on-site. [10 CSR 10-6.065(6)(C)1.C(II)] The permittee shall immediately make such permit available to any Missouri Department of Natural Resources personnel upon request. [10 CSR 10-6.065(6)(C)3.B]

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

- 1) The permittee shall follow the procedures and requirements of 40 CFR Part 61, Subpart M for any activities occurring at this installation which would be subject to provisions for 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos.
- 2) The permittee shall conduct monitoring to demonstrate compliance with registration, certification, notification, and Abatement Procedures and Practices standards as specified in 40 CFR Part 61, Subpart M.

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

- 1) The permittee shall submit full emissions report either electronically via MoEIS, which requires Form 1.0 signed by an authorized company representative, or on Emission Inventory Questionnaire (EIQ) paper forms on the frequency specified in this rule and in accordance with the requirements outlined in this rule. Alternate methods of reporting the emissions, such as spreadsheet file, can be submitted for approval by the director.
- 2) The permittee may be required by the director to file additional reports.
- 3) Public Availability of Emission Data and Process Information. Any information obtained pursuant to the rule(s) of the Missouri Air Conservation Commission that would not be entitled to confidential treatment under 10 CSR 10-6.210 shall be made available to any member of the public upon request.
- 4) The permittee shall pay an annual emission fee per ton of regulated air pollutant emitted according to the schedule in the rule. This fee is an emission fee assessed under authority of RSMo. 643.079.
- 5) The fees shall be payable to the Department of Natural Resources and shall be accompanied by the emissions report.

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

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

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

10 CSR 10-6.150 Circumvention

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

10 CSR 10-6.165 Restriction of Emission of Odors

This requirement is not federally enforceable.

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

10 CSR 10-6.170

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

Emission Limitation:

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

- b) Paving or frequent cleaning of roads, driveways and parking lots;
- c) Application of dust-free surfaces;
- d) Application of water; and
- e) Planting and maintenance of vegetative ground cover.

10 CSR 10-6.180 Measurement of Emissions of Air Contaminants

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

10 CSR 10-6.250 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";
 - 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.

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

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

10 CSR 10-6.065(6)(C)1.B Permit Duration

This permit is issued for a term of five years, commencing on the date of issuance. This permit will expire at the end of this period unless renewed.

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

- 1) Record Keeping
 - a) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
 - b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any Missouri Department of Natural Resources' personnel upon request.
- 2) Reporting
 - a) All reports shall be submitted to the Air Pollution Control Program, Compliance and Enforcement Section, P. O. Box 176, Jefferson City, MO 65102.
 - b) The permittee shall submit a report of all required monitoring by:
 - i) October 1st for monitoring which covers the January through June time period, and
 - ii) April 1st for monitoring which covers the July through December time period.
 - iii) Exception. Monitoring requirements which require reporting more frequently than semi annually shall report no later than 30 days after the end of the calendar quarter in which the measurements were taken.
 - c) Each report shall identify any deviations from emission limitations, monitoring, record keeping, reporting, or any other requirements of the permit, this includes deviations or Part 64 exceedances.
 - d) Submit supplemental reports as required or as needed. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
 - i) Notice of any deviation resulting from an emergency (or upset) condition as defined in paragraph (6)(C)7.A of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two working days after the date on which the emission limitation is exceeded due to the emergency, if the permittee wishes to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and the permittee can identify the cause(s) of the emergency. The permitted installation must show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or requirements in the permit. The notice must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.
 - ii) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.

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

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

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

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

10 CSR 10-6.065(6)(C)1.E Title IV Allowances

In a memorandum issued October 28, 2002, MDNR APCP established the exemption for Carrollton Municipal Utilities of Phase II Acid Rain Permitting. Emission Units E18-E27 are exempt per §72.6(b), and E30 is exempt per the new unit exemption §72.7(a).

10 CSR 10-6.065(6)(C)1.F Severability Clause

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

10 CSR 10-6.065(6)(C)1.G General Requirements

- 1) The permittee must comply with all of the terms and conditions of this permit. Any noncompliance with a permit condition constitutes a violation and is grounds for enforcement action, permit termination, permit revocation and re-issuance, permit modification or denial of a permit renewal application.
- 2) The permittee may not use as a defense in an enforcement action that it would have been necessary for the permittee to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit
- 3) The permit may be modified, revoked, reopened, reissued or terminated for cause. Except as provided for minor permit modifications, the filing of an application or request for a permit modification, revocation and reissuance, or termination, or the filing of a notification of planned changes or anticipated noncompliance, does not stay any permit condition.
- 4) This permit does not convey any property rights of any sort, nor grant any exclusive privilege.

- 5) The permittee shall furnish to the Air Pollution Control Program, upon receipt of a written request and within a reasonable time, any information that the Air Pollution Control Program reasonably may require to determine whether cause exists for modifying, reopening, reissuing or revoking the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the Air Pollution Control Program copies of records required to be kept by the permittee. The permittee may make a claim of confidentiality for any information or records submitted pursuant to 10 CSR 10-6.065(6)(C)1.

10 CSR 10-6.065(6)(C)1.H Incentive Programs Not Requiring Permit Revisions

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

10 CSR 10-6.065(6)(C)1.I Reasonably Anticipated Operating Scenarios

None.

10 CSR 10-6.065(6)(C)3 Compliance Requirements

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

Part 64 exceedances and excursions must be included in the compliance certifications. The compliance certification shall include the following:

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

10 CSR 10-6.065(6)(C)6 Permit Shield

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

10 CSR 10-6.065(6)(C)7 Emergency Provisions

- 1) An emergency or upset as defined in 10 CSR 10-6.065(6)(C)7.A shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emissions limitations. To establish an emergency- or upset-based defense, the permittee must demonstrate, through properly signed, contemporaneous operating logs or other relevant evidence, the following:
 - a) That an emergency or upset occurred and that the permittee can identify the source of the emergency or upset,
 - b) That the installation was being operated properly,
 - c) That the permittee took all reasonable steps to minimize emissions that exceeded technology-based emissions limitations or requirements in this permit, and
 - d) That the permittee submitted notice of the emergency to the Air Pollution Control Program within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.
- 2) Be aware that an emergency or upset shall not include noncompliance caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

10 CSR 10-6.065(6)(C)8 Operational Flexibility

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

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

10 CSR 10-6.065(6)(C)9 Off-Permit Changes

- 1) Except as noted below, the permittee may make any change in its permitted operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Insignificant activities listed in the application, but not otherwise addressed in or prohibited by this permit, shall not be considered to be constrained by this permit for purposes of the off-permit provisions of this section. Off-permit changes shall be subject to the following requirements and restrictions:
 - a) The change must meet all applicable requirements of the Act and may not violate any existing permit term or condition; the permittee may not change a permitted installation without a permit revision if this change is subject to any requirements under Title IV of the Act or is a Title I modification;
 - b) The permittee must provide contemporaneous written notice of the change to the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219. This notice shall not be required for changes that are insignificant activities under 10 CSR 10-6.065(6)(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.

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

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

10 CSR 10-6.065(6)(E)6 Reopening-Permit for Cause

This permit may be reopened for cause if:

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

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

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

VI. Attachments

Attachments follow.

Attachment A
 Monthly NO_x Emission Tracking Record for EP30

This sheet covers the month of _____ in the year _____.

Copy as needed.

Date	(a)	(b)	(c)
	Monthly Amount of Fuel Combusted (1000 gal)	NO _x Emission Factor (lbs/1000 gal)	Monthly NO _x Emissions (Tons)
		604	
(d) Total Malfunction Emissions for this month in Tons			
(e) Total Emissions for this month in Tons			
(f) 12-Month Rolling NO _x Emissions Total from Previous Month's Attachment A, in Tons:			
(g) Monthly NO _x Emissions Total (h) from Previous Year's Attachment A for this month, in Tons:			
(h) Current 12-month Rolling Total of NO _x Emissions in Tons: [(e) + (f) - (g)]			

- (a) Total amount of fuel combusted in EP30;
- (b) Use the emission factor of 604 lbs/1000 gal per SCC 20100102;
- (c) Total Monthly NO_x Emissions = (a) x (b) x 0.0005;
- (d) In the event of a malfunction or upset, the malfunction emissions shall be taken from the report the installation is required to submit to Missouri DNR ACPD per 10 CSR 10-6.050(3)(A) after a malfunction has occurred.
- (e) Total emission for this month (c) + (d)
- (f) 12-Month Rolling NO_x emission total (f) from last month's Attachment A, in Tons;
- (g) Monthly NO_x emissions total (c) from previous year's Attachment A, in Tons;
- (h) Calculated the new 12-month Rolling NO_x emissions total. **A 12-Month rolling NO_x emissions total (f) of less than 40 tons indicates compliance.**

Attachment B
Abbreviations and Acronyms

%percent	m/smeters per second
°Fdegrees Fahrenheit	Mgal1,000 gallons
acfmactual cubic feet per minute	MWmegawatt
BACTBest Available Control Technology	MHDRmaximum hourly design rate
BMPsBest Management Practices	MMBtuMillion British thermal units
BtuBritish thermal unit	MMCFmillion cubic feet
CAMCompliance Assurance Monitoring	MSDSMaterial Safety Data Sheet
CASChemical Abstracts Service	NAAQSNational Ambient Air Quality Standards
CEMSContinuous Emission Monitor System	NESHAPs National Emissions Standards for Hazardous Air Pollutants
CFRCode of Federal Regulations	NO_xnitrogen oxides
COcarbon monoxide	NSPSNew Source Performance Standards
CO₂carbon dioxide	NSRNew Source Review
CO_{2e}carbon dioxide equivalent	PMparticulate matter
COMSContinuous Opacity Monitoring System	PM_{2.5}particulate matter less than 2.5 microns in aerodynamic diameter
CSRCode of State Regulations	PM₁₀particulate matter less than 10 microns in aerodynamic diameter
dscfdry standard cubic feet	ppmparts per million
EIQEmission Inventory Questionnaire	PSDPrevention of Significant Deterioration
EPEmission Point	PTEpotential to emit
EPAEnvironmental Protection Agency	RACTReasonable Available Control Technology
EUEmission Unit	RALRisk Assessment Level
fpsfeet per second	SCCSource Classification Code
ftfeet	scfmstandard cubic feet per minute
GACTGenerally Available Control Technology	SDSSafety Data Sheet
GHGGreenhouse Gas	SICStandard Industrial Classification
gpmgallons per minute	SIPState Implementation Plan
grgrains	SMALScreening Model Action Levels
GWPGlobal Warming Potential	SO_xsulfur oxides
HAPHazardous Air Pollutant	SO₂sulfur dioxide
hrhour	tphtons per hour
hphorsepower	tpytons per year
lbpound	VMTvehicle miles traveled
lbs/hrpounds per hour	VOC Volatile Organic Compound
MACTMaximum Achievable Control Technology	
µg/m³micrograms per cubic meter	

STATEMENT OF BASIS

INSTALLATION DESCRIPTION

Carrollton Municipal Utilities (CMU) operates a plant to generate electric power for consumption when necessary. CMU purchases power from Kansas City Power and Light, but uses this facility as an emergency backup. The facility consists of one diesel generator and five dual fuel generators, and several fuel oil storage tanks. The facility is not a named source; therefore fugitive emissions are not included in the PTE calculations.

The facility previously operated as a peaking plant. However, the permittee decided not to install catalysts on the engines in order to comply with newly promulgated requirements in the RICE regulation. In a letter dated October 13, 2015 to Lisa Hanlon of U.S. EPA Region 7, the facility states that they will operate the emission units as emergency engines until catalysts are installed. In 1963 the permittee was set up for an inter-connection with Kansas City Power & Light to purchase a maximum on 10 megawatts of electricity, and then would run the peaking engines if the electric load was over 10 megawatts. With the new regulations, the permittee installed a new interconnection of 20 megawatts to cover the peak load time.

Updated Potential to Emit for the Installation

Pollutant	Potential to Emit (tons/yr) ¹
PM ₁₀	2.07
PM _{2.5}	2.07
Sulfur Oxides (SO _x)	5.02
Nitrogen Oxides (NO _x)	119.67
Volatile Organic Compounds	7.99
Carbon Monoxide (CO)	22.51
Hazardous Air Pollutants (HAP's)	0.52

¹Each engine was evaluated at 500 hours of uncontrolled annual operation for emergency engines. Potential emissions from the storage tanks, wastewater treatment chemicals, and parts washer were not included in the totals.

Reported Air Pollutant Emissions, tons per year

Pollutants	2015	2014	2013	2012	2011
Particulate Matter ≤ Ten Microns (PM ₁₀)	0.04	0.05	0.09	0.14	0.18
Particulate Matter ≤ 2.5 Microns (PM _{2.5})	0.04	0.05	0.09	0.14	0.18
Sulfur Oxides (SO _x)	0.11	0.14	0.22	0.27	0.42
Nitrogen Oxides (NO _x)	2.67	2.95	5.71	0.91	10.88
Volatile Organic Compounds (VOC)	2.47	6.36	5.72	7.63	7.46
Carbon Monoxide (CO)	0.5	0.57	1.05	1.70	2.00

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 July 14, 2014;
- 2) 2015 Emissions Inventory Questionnaire, received March 11, 2016;
- 3) Construction Permit No. 072001-006;
- 4) Operating Permit No. OP2009-019; and
- 5) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition.

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

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

None.

Other Air Regulations Determined Not to Apply to the Operating Permit

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

10 CSR 10-6.100, Alternate Emission Limits

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

10 CSR 10-6.260 Restriction of Emissions of Sulfur Compounds

The rule applies to the site, however Permit Condition 1 has a more restrictive fuel sulfur content limit that is federally enforceable.

10 CSR 10-261 Control of Sulfur Dioxide Emissions

The rule applies to the site, however the site is exempt from this rule since Permit Condition 1 has a more restrictive fuel sulfur content limit that is federally enforceable.

Update to Emission Units

During the application review process, there was some information that was included in the application that was determined to not be necessary. The application additionally listed diesel engine EP18 and EP19 as well as dual fuel engines E21, E22, and E23. Through email correspondence it was found that EP18 and EP19 were decommissioned in the late 1950's and E21, E22, and E23 were decommissioned in 2004 according to James Paul, Carrollton Municipal Utilities' General Manager.

Construction Permit History

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

Construction Permit No. 072001-006

Issued July 5, 2001, the permit authorized the installation of a 2000 kW backup diesel generator.

There is a special condition associated with the Construction Permit stating that the generator shall emit less than 40 tons on nitrogen oxides (NO_x) in any consecutive 12-month period. The special

condition is included in this operating permit as Permit Condition 2. When this permit was written, the emission unit was given the limit of 40 tons per year so that it would remain below the de minimis threshold for construction permitting. The conditioned potential emissions of 40 tons per year for NOx equates to a maximum operation time of 2,790 hours per 12 month period for the diesel generator. Even though the emission unit is now an emergency generator, the limitation is still set that it can't operate in excess of 2,790 hours per year. The generator is a limited use emergency generator.

New Source Performance Standards (NSPS) Applicability

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

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

On July 5, 2001, the MDNR APCP issued a permit to construct a backup diesel generator. Details of the installation dates for each generator can be found in the chart below. Since all engines were installed prior to the applicability date of this regulation, therefore this regulation does not apply.

Emission Point	Description	Manufacturer/Model #	Installation Date
E20	Dual fuel generator, (1,825 kW)	Enterprise	1963
E24	Dual fuel generator, (2,500 kW)	Nordberg	1959
E25	Dual fuel generator, (4,100 kW)	Enterprise	1966
E26	Dual fuel generator, (4,100 kW)	Enterprise	1969
E27	Dual fuel engine, (6,300 kW)	Enterprise	1971
E30	Diesel generator, 6.5 MMBtu/hr (2,000 kW)	ONAN 2000 DQKC	2001

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

The regulation applies to facilities that have vessels with a capacity of 40,000 gallons or greater. This regulation does not apply since all of the storage vessels at the facility have a capacity of 20,000 gallons or less.

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

The regulation applies to facilities that have storage vessels with a capacity greater than 40,000 gallons that is used to store petroleum liquids that commenced construction after May 18, 1978. This regulation does not apply since all of the storage vessels at the facility have a capacity of 20,000 gallons or less.

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

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

40 CFR Part 60 Subpart TTTT – Standards of Performance for Greenhouse Gas Emissions for Electric Generating Units

The permittee is not subject to this subpart since it does not have steam generating units or stationary combustion turbines per §60.5509(a).

Maximum Achievable Control Technology (MACT) Applicability

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

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

The facility is subject to this subpart based on §63.6585(a), and is subject to the provisions for existing emergency engines located at area sources of HAP emissions.

Although federal regulation 40 CFR Part 63 Subpart ZZZZ has no time limit on the use of emergency stationary RICE units in emergency situations, EP-30 is limited to 2,790 hours annually by Construction Permit 072001-006, in Permit Condition 2.

40 CFR Part 63 Subpart T – National Emission Standards for Halogenated Solvent Cleaning

The regulation is not subject to the facility since the parts washer does not use any solvent containing methylene chloride (CAS No. 75-09-2), perchloroethylene (CAS No. 127-18-4), trichloroethylene (CAS No. 79-01-6), 1,1,1-trichloroethane (CAS No. 71-55-6), carbon tetrachloride (CAS No. 56-23-5) or chloroform (CAS No. 67-66-3), or any combination of these halogenated HAP solvents.

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

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

Compliance Assurance Monitoring (CAM) Applicability

40 CFR Part 64, *Compliance Assurance Monitoring (CAM)*

The CAM rule applies to each pollutant specific emission unit that:

- Is subject to an emission limitation or standard, and
- Uses a control device to achieve compliance, and
- Has pre-control emissions that exceed or are equivalent to the major source threshold.

40 CFR Part 64 is not applicable because none of the pollutant-specific emission units uses a control device to achieve compliance with a relevant standard.

Greenhouse Gas Emissions

Note that this source is 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. The applicant is required to report the data directly to EPA. The public may obtain CO₂ emissions data for this installation by visiting <http://epa.gov/ghgreporting/ghgdata/reportingdatasets.html>.

Other Regulatory Determinations

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

This regulation applies to sources of visible emission throughout the state of Missouri. 6.220(1)(A) says that internal combustion engines outside of the Kansas City and St. Louis metropolitan areas are exempt from this regulation. All of the units are internal combustion engines, therefore this regulation has not been included in this operating permit.

10 CSR 10-6.261 Control of Sulfur Dioxide Emissions

This regulation applies to installations that are an emission source of sulfur dioxide (SO₂). However, the installation is exempt of this regulation. The installation is exempt from this condition because it is subject to a more restrictive fuel sulfur content limit under any federally enforceable permit per 10 CSR 10-261(1)(C)2. Permit Condition 1 has provisions for the fuel sulfur requirements of MACT ZZZZ §63.6604(b). MACT ZZZZ §63.6604(b) allows for a maximum sulfur fuel content of 15 ppm, while 10 CSR 10-6.261 allows for a maximum emission of 35,249 ppm for existing sources and a maximum emission of 8,812 ppm for new sources.

10 CSR 10-6.270 Acid Rain Source Permits Required

This regulation applies to facilities that affected sources and affected units under the federal Acid Rain Program. The installation is not subject to the regulation since the units are exempt per §72.6(b) and §72.7(a).

10 CSR 10-6.360 Control of NO_x Emissions from Electric Generating Units and Non-Electric Generating Boilers

This regulation applies to electric generating units to reduce emission of NO_x to ensure compliance with the federal NO_x control plan to reduce the transport of air pollutants. The facility is located in Carroll County, which is not among the list of counties this regulation applies to per 6.360(1)(A). Therefore the units are not subject to this regulation.

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

This regulation applies to stationary internal combustion engines to reduce emission of NO_x to ensure compliance with the federal NO_x control plan to reduce the transport of air pollutants. The facility is located in Carroll County, which is not among the list of counties this regulation applies to per 6.390(1). Therefore the units are not subject to this regulation.

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

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

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

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

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

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

Response to Public Comments

On July 1, 2016 comments were received from Mark A. Smith, Chief of Air Permitting and Compliance Branch of the United States Environmental Protection Agency Region 7. The comments are addressed in the order in which they appear within the letter(s).

Comment #1: The Installation Description, on the draft permit cover sheet, indicates Carrollton Municipal Utilities operates as a “peaking plant” to generate electric power for consumption when necessary. The Installation Description in the Statement of Basis, indicates the facility operates an “emergency back plant” to generate electric power consumption when necessary. The requirements for a peaking plant and for an emergency back plant are different and therefore, EPA recommends MDNR provide a consistent Installation Description that allows for verification that assures the applicable requirements are included in this operating permit.

Response to Comment: The draft permit has been edited for consistent Installation Description that the facility operates as an “emergency backup plant”.

Comment #2: Permit Condition 1 incorporates the applicable requirements from 40 CFR part 63, Subpart ZZZZ- “*National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines*” (RICE). EPA has several comments associated with Permit Condition 1 including:

- The determination of which set of RICE NESHAP requirements apply to any particular facility is dependent upon the several operating factors; one of which is the horsepower (hp) of the reciprocating internal combustion engine (RICE) and not on the capacity of the electrical generator being driven by the RICE. However, there is no indication, in this draft operating permit, of the hp of emission units EP-20, EP-24, EP-25, EP-26, EP-27 and EP-30. Therefore the public does not have sufficient available information to verify that the requirements presented in Permit Condition 1 are correct and complete. So, EPA recommends MDNR include the horsepower for each RICE used to drive each emergency generator.
- The tabular presentation, within Permit Condition 1, lists six (6) RICE driven emergency generators; EP-20, EP-24, EP-25, EP-26, EP-27 and EP-30. However, the operating permit renewal application, submitted by the Board of Public Works for Carrollton Municipal Utilities on July 14, 2014, includes emission unit information for ten (10) dual fuel electric power generating engines. There does not appear to be any explanation, in either the permit or the Statement of Basis, which explains why five (5) emergency generators in the renewal application are not included in the operating permit. EPA recommends MDNR provide the necessary discussion to clarify the difference between Carrollton’s application and this draft permit.
- There are multiple references “to this subpart;” “of this subpart;” “of this section;” and “by this paragraph;” throughout Permit Condition 1. Permit Condition 1 is in an operating permit and operating permits do not traditionally contain “subparts,” “sections,” and “paragraphs.” EPA recommends MDNR modify the wording in Permit Condition 1 to remove these regulatory references and tailor the language to customary operating permit language.
- There are also multiple references to “owner or operator” throughout the requirements of Permit Condition 1 and traditionally, MDNR uses the term “permittee” to reflect

- compliance verification responsibility. EPA recommends MDNR continue with their customary practice.
- Operational limitation 4.C.i) provides the permittee relief prior to May 3, 2014. Clearly this operating permit will be issued well after the date of relief and EPA questions whether or not this requirement is still applicable. Additionally, Reporting requirement 2.B. requires the first annual report submittal no later than March 31, 2016. Here again, this date is well passed the operating permit issue date and this may no longer be an applicable requirement. Finally, operational limitation 2., requires the permittee to reestablish operating parameters if they change catalyst. EPA understands that Carrollton Municipal Utilities chose not to install catalyst, so EPA questions whether or not this is an applicable requirement.
 - Operational limitation 4., in Permit Condition 1, begins by saying: “If you own or operate an emergency stationary RICE you must... ..” Permit Condition 1 is included in the operating permit to convey all applicable requirements associated with the operations of Carrollton Municipal Utilities emergency stationary RICE. So, the wording in this requirement appears to be rather awkward and EPA suggests MDNR consider revising to reflect actual conditions.
 - Record keeping requirement 3., in Permit Condition 1, requires the permittee to keep records of hours of operation of the engine that is recorded through the non-resettable hour meter.” However, there does not seem to be a requirement for the permittee to install non-resettable hour meters and it would appear that all engines would need a meter and not just one engine. EPA recommends MDNR clarify this requirement.
 - Record keeping requirement 5., and recordkeeping requirement 6., in Permit Condition 1, appear to be identical in their requirements and EPA suggests MDNR might consider combining the two requirements into one single requirement.
 - MDNR relies on EPA for compliance management of area source hazardous air pollutant maximum achievable control technology standards. 40 CFR part 63, Subpart ZZZZ is of these standards and therefore the compliance reports should be submitted to the Missouri Air Compliance Coordinator at EPA Region 7 with MDNR receiving copies, as necessary. Reporting requirement in Permit Condition 1 should be modified to reflect this reporting scenario.

Response to Comment: The table in Permit Condition 1 has been modified to include the horsepower rating for each emergency generator. A section titled “Update to Emission Units” was added before the “Construction Permit History” section of the Statement of Basis to clarify the difference in the number of emission units in the facility’s application and permit. Permit Condition 1 has been modified to customary MDNR operating permit language and to better clarify the applicability to the facility. Word has been added to the permit condition to require the facility to install non-resettable hour meters. Wording in Recordkeeping Requirement 3 as been modified to clarify the requirement.

Comment #3: Permit Condition 1 requires that the permittee maintain records of its oil analysis according to their program (emission limitation 5); records regarding use of emergency generators for non-emergency situations (operational limitation 4.C); records of maintenance and hours of operation (record keeping 2 and 3) and to develop and follow maintenance plan. MDNR’s customary practice is to provide examples of the permittee’s compliance verification data collection worksheets as attachments to the operating permit for public review and comment. EPA recommends MDNR include examples of

all data collection records Carrollton Municipal Utilities uses to verify compliance as referenced attachments in this operating permit.

Response to Comment: It is customary practice that MDNR provide tracking sheets when the facility is looking to remain in compliance with a set limitation. In the instances of the oil analysis program (emission limitation 5), record keeping of non-emergency use (operational limitation 4.C), records of maintenance and hours of operation (record keeping 2 and 3), and develop and follow and maintenance plan; it is MDNR's belief that providing one to the facility is not necessary.

Comment #4: Carrollton Municipal Utilities appears to have voluntarily changed their method of operation; going from a "peak shaving" facility to an "emergency facility" in an effort to forgo the installation of the RICE NESHAP emission controls. This voluntary change was reported to EPA, in a letter submitted on October 13, 2015, which is so stated in this operating permit Statement of Basis. However, the Statement of Basis, as mentioned in Section V, is not an actual part of the permit. EPA, therefore, recommends that MDNR add language to Permit Condition 1 reinforcing Carrollton Municipal Utilities preferred method of operation and stipulate that any change to, other than emergency operation, requires the installation of controls prior to the time of change.

Response to Comment: Wording has been added in Operational Limitation #5 requiring the installation to operate as an emergency facility. If it desires to change the operational type, it is required to install control devices.



Eric R. Greitens, Governor • Carol S. Comer, Acting Director

DEPARTMENT OF NATURAL RESOURCES

dnr.mo.gov

JAN 26 2017

Mr. James Paul
Carrollton Municipal Utilities
P.O. Box 460
Carrollton, MO 64633

Re: Carrollton Municipal Utilities, 033-0022
Permit Number: OP2017-001

Dear Mr. Paul:

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

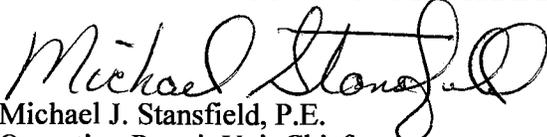
This permit may include requirements with which you may not be familiar. If you would like the department to meet with you to discuss how to understand and satisfy the requirements contained in this permit, an appointment referred to as a Compliance Assistance Visit (CAV) can be set up with you. To request 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:jrj

Enclosures

c: PAMS File: 2014-07-031



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