



Missouri Department of dnr.mo.gov

**NATURAL RESOURCES**

Michael L. Parson, Governor

Carol S. Comer, Director

August 26, 2020

Michael A Tortorici  
Director  
CenterPoint  
14510 Botts Road  
Kansas City, MO 64147

RE: New Source Review Permit Amendment - Permit Number: 022018-007A  
Project Number: 2020-05-033; Installation Number: 095-2450

Dear Michael A Tortorici:

On May 5, 2020, the Missouri Air Pollution Control Program received your request to amend the construction permit (022018-007) for your installation in Jackson County (S27, T47N, R33W). Enclosed with this letter is your amendment. The special conditions of this amendment replaces Special Condition No. 3 in Permit 022018-007.

The Kansas City National Security Campus consists of two separate operations. One operation is owned by the Department of Energy (DOE) National Nuclear Security Administration (NNSA) and operated by Honeywell Federal Manufacturing and Technologies. This portion of the facility manufactures non-nuclear components of nuclear weapons. The second operation is owned by CenterPoint and includes units for providing HVAC, hot water, and emergency power to NNSA. The combined installation is referred to as the Kansas City National Security Campus (KCNSC). The production and support activities have separate installation IDs and are permitted separately, but are considered part of the same installation. The production facility (NNSA) operates under installation ID 093-2442 and Permit No. 032018-001 while the support facility (CenterPoint) operates under installation ID 095-2450 and Permit No. 022018-007.

CenterPoint and NNSA frequently install emission units with relatively low potential and actual emissions. Permits and amendments are frequently required prior to beginning construction. In order to limit the number of times that the facilities have to apply for permits and amendments, special case de minimis permits (032018-001 and 022018-007) were issued to the installation in 2018. Permit 032018-001 is for NNSA while Permit 022018-007 is for CenterPoint. The special case de minimis permits preapproves the addition of many types of future emission units. The special case de minimis permits also



allocate the PM<sub>10</sub>, NO<sub>x</sub>, VOC, and HAPs emissions between NNSA and CenterPoint so that the combined emissions of all these pollutants are below their respective de minimis levels. The portions allowed for each operation are given below in Table 1.

**Table 1: Current Emission Limits**

<b>Pollutants</b>	<b>De Minimis Level</b>	<b>Limits in NNSA Permit 032018-001</b>	<b>Limits in CenterPoint Permit 022018-007</b>
PM <sub>10</sub>	15.0	<5.0	<10.0
NO <sub>x</sub>	40.0	<2.0	<38.0
VOC	40.0	<39.0	<1.0
Individual HAP	Varies	<SMAL	
Combined HAPs	25.0	<25.0	

After the issuance of Permit No. 032018-001, NNSA realized that for the preapproved combustion processes listed under Emission Point No. 26, a few diesel and gasoline engines were not included. Furthermore, the two operations would like to modify the allocation of the NO<sub>x</sub> emissions. Therefore, this amendment is issued to allow 36.0 tpy of NO<sub>x</sub> to CenterPoint, leaving 4.0 tpy of NO<sub>x</sub> to NNSA.

This permit only modifies Permit 022018-007 for CenterPoint to reallocate the NO<sub>x</sub> emissions. Permit 032018-001 for NNSA will be modified through another permit action (Project No. 2020-03-015) to add the diesel and gasoline engines and to reallocate the 4.0 tpy of NO<sub>x</sub> to NNSA.

If you were adversely affected by this permit decision, you may be entitled to pursue an appeal before the administrative hearing commission pursuant to Sections 621.250 and 643.075.6 RSMo. To appeal, you must file a petition with the administrative hearing commission 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 administrative hearing commission, whose contact information is: Administrative Hearing Commission, United States Post Office Building, 131 West High Street, Third Floor, P.O. Box 1557, Jefferson City, Missouri 65102, phone: 573-751-2422, fax: 573-751-5018, website: [www.ao.mo.gov/ahc](http://www.ao.mo.gov/ahc).

Michael A Tortorici  
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If you have any questions regarding this amendment, please do not hesitate to contact Chia-Wei Young, at the department's Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102 or at (573) 751-4817. Thank you for your attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

A handwritten signature in blue ink that reads "Kendall B. Hale". The signature is written in a cursive style.

Kendall B. Hale  
Permits Section Chief

KBH:cya

Enclosures

c: Kansas City Regional Office  
PAMS File: 2020-05-033

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Permit No.	022018-007A
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**SPECIAL CONDITIONS:**

The permittee is authorized to construct and operate subject to the following special conditions: *The special conditions listed in this permit were included based on the authority granted the Missouri Air Pollution Control Program by the Missouri Air Conservation Law (specifically 643.075) and by the Missouri Rules listed in Title 10, Division 10 of the Code of State Regulations (specifically 10 CSR 10-6.060). For specific details regarding conditions, see 10 CSR 10-6.060 paragraph (3)(E). “Conditions required by permitting authority.”*

CenterPoint

Jackson County, S27, T47N, R33W

1. **Superseding Condition**

The conditions of this permit supersede Special Condition No. 3 found in the previously issued construction permit 022018-007 issued by the Air Pollution Control Program.

2. **NO<sub>x</sub> Emission Limitation**

A. CenterPoint shall emit less than 36.0 tons of NO<sub>x</sub> in any consecutive 12-month rolling period from the emission units in Table 1. The installation shall include all actual emissions in this limit, including SSM emissions as well as any excess SSM emissions as reported to the Air Pollution Control Program’s Compliance/Enforcement section in accordance with the requirements of 10 CSR 10-6.050, *Start-up, Shutdown, and Malfunction Conditions*.

**Table 1: Installation-Wide Emission Units**

Emission Unit	Installation’s Designation	Description	MHDR	MHDR Units
EU-01	B-5-01	(1) Johnston boiler model PFTX600-3X125W, serial 10917-01, equipped with (1) Limpsfield Engineering dual fuel burner model LCNO73, serial 00740, natural gas and fuel oil	25.0	Heat input MMBtu/hr
EU-02	B-5-02	(1) Johnston boiler model PFTX600-3X125W, serial 10917-02, equipped with (1) Limpsfield Engineering dual fuel burner model LCNO73, serial 00739, natural gas and fuel oil	25.0	
EU-03	B-5-03	(1) Johnston boiler model PFTX600-3X125W, serial 10917-03, equipped with (1) Limpsfield Engineering dual fuel burner model LCNO73, serial 00737, natural gas and fuel oil	25.0	
EU-04	B-5-04	(1) Johnston boiler model PFTX600-3X125W, serial 10917-04, equipped with (1) Limpsfield Engineering dual fuel burner model LCNO73, serial 00738, natural gas and fuel oil	25.0	
EU-05	SB-1	(1) Unilux boiler model ZF 400HS, serial A2387 equipped with (1) Power Flame natural gas burner model C3-G-25	4.718	

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**SPECIAL CONDITIONS:**

The permittee is authorized to construct and operate subject to the following special conditions:

Emission Unit	Installation's Designation	Description	MHDR	MHDR Units	
EU-06	B-2401	(1) Lattner WLF-30 boiler equipped with (1) Power Flame natural gas burner model J50A-15	2.200	Heat input MMBtu/hr	
EU-07	B-2301	(1) Lattner WLF-50 boiler equipped with (1) Power Flame natural gas burner model C2-GO-20B	3.080		
EU-14	AHU-2F07	Ultra Low Humidity Unit 1	0.091		
EU-15	AHU-2A02	Ultra Low Humidity Unit 2	0.363		
EU-16	AHU-2J01	Ultra Low Humidity Unit 3	1.818		
EU-17	AHU-2J02	Ultra Low Humidity Unit 4	1.818		
EU-18	AHU-2K05	Ultra Low Humidity Unit 5	0.160		
EU-19	AHU-2R03	Ultra Low Humidity Unit 6	1.919		
EU-20	AHU-2R04	Ultra Low Humidity Unit 7	0.767		
EU-21	AHU-2R05	Ultra Low Humidity Unit 8	0.196		
EU-22	AHU-3E01	Ultra Low Humidity Unit 9	0.374		
EU-23	MAU-5-01	Makeup Air Unit 1	1.125		
EU-24	MAU-5-02	Makeup Air Unit 2	1.125		
EU-25	MAU-5-03	Makeup Air Unit 3	1.125		
EU-26	MAU-5-04	Makeup Air Unit 4	1.125		
EU-27	WH-5-01	Domestic Water Heater	0.300		
EU-08	GEN-2P8-01	Kohler model 8.5RES generator set, natural gas engine model CH640, serial 3038896, 4 stroke, 12.2 bhp, emergency use	0.135		
EU-09	GEN-2P8-02	Kohler model 8.5RES generator set, natural gas engine model CH640, serial 3037495, 4 stroke, 12.2 bhp, emergency use	0.135		
EU-10	GEN-4P2-01	Kohler model 20RESA generator set, natural gas engine model CH1000, serial 3052186, 4 stroke, 27.1 bhp, emergency use	0.287		
EU-11	GEN-4P2-02	Kohler model 20RESA generator set, natural gas engine model CH1000, serial 3052187, 4 stroke, 27.1 bhp, emergency use	0.287		
EU-12	GEN1-11	Cummins model 175DSHAB generator set, diesel engine model QSL9-G2 NR3, 364 bhp, 4 stroke, Tier 3, 6 cyl, 8.9L total displacement, emergency use	2.02		
EU-13		Clarke fire pump model JU6H-UFADW8, Deere diesel engine, 282 bhp, 4 stroke, Tier 3, 6cyl, 6.8L total displacement, emergency	1.86		
EU-28		8,000 gallon diesel tank	404.49		Annual potential turnovers
EU-29		8,000 gallon diesel tank	404.49		
EU-30		Induced draft counterflow cooling tower, cell 1	10,000		Gal/min
EU-31		Induced draft counterflow cooling tower, cell 2	10,000		Gal/min
EU-32		Induced draft counterflow cooling tower, cell 3	10,000		Gal/min
EU-33		Induced draft counterflow cooling tower, cell 4	10,000	Gal/min	

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**SPECIAL CONDITIONS:**

The permittee is authorized to construct and operate subject to the following special conditions:

Emission Unit	Installation's Designation	Description	MHDR	MHDR Units
EU-34	AHU-2F26	Low humidity air unit for room 2.M201, natural gas fired	0.69	Heat input MMBtu/hr
EU-35	DH-2R06	Dehumidification unit (natural gas fired) on existing unit AHU-2R06 (existing is not gas-fired) at room 2.R155	1.0	
EU-36		Paved haul road, fuel delivery	0.046	VMT/hr
N/D	N/D	All emission units added during this permit effective period.	N/D	N/D

N/D = not yet determined.

EU-14 through EU-27 are natural gas fired.

- B. CenterPoint shall develop and use electronic or written forms to demonstrate compliance with Special Condition 2.A. The forms shall contain, at a minimum, the following information.
- 1) Installation name
  - 2) Installation ID
  - 3) Permit number
  - 4) Current month
  - 5) Current 12-month date range
  - 6) Monthly throughput for each emission unit with the potential to emit NO<sub>x</sub>, as indicated in Appendix C, See Table 2
  - 7) NO<sub>x</sub> emission factors for each emission unit. See Table 2

**Table 2: NO<sub>x</sub> Emission Factors**

Emission Unit	NO <sub>x</sub> Emission Factor	Units of Measure
EU-01 through EU-04	100.0	Lb/MMscf natural gas
	20.0	Lb/1,000 gal fuel oil or diesel
EU-05 through EU-07 EU-14 through EU-27 EU-34 and EU-35	100.0	Lb/MMscf natural gas
EU-08 and EU-09	0.16	Lb/hr per engine
EU-10 and EU-11	0.66	Lb/hr per engine
EU-12	2.39	Lb/hr
EU-13	1.86	Lb/hr
EU-28 and EU-29	N/A	N/A
EU-30 through EU-33	N/A	N/A
All emission units added during this permit effective period.		
Emission Unit	NO <sub>x</sub> Emission Factor	Units of Measure
External natural gas combustion, such as heater, humidity unit, or boiler	100.0	Lb/MMscf natural gas
External fuel oil or diesel combustion such as boiler	20.0	Lb/1,000 gal fuel oil or diesel

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**SPECIAL CONDITIONS:**

The permittee is authorized to construct and operate subject to the following special conditions:

Natural gas fired (NG) reciprocating internal combustion engine (RICE) < 25 HP	2.4E-02	Lb/(HP * hr) per engine
NG RICE > 25 HP	4.4E-03	Lb/(HP * hr) per engine
Tier 3 diesel RICE	6.6E-03	Lb/(HP * hr) per engine
Tier 4 diesel RICE < 750 HP	6.6E-04	Lb/(HP * hr) per engine
Tier 4 diesel RICE > 750 HP	5.8E-03	Lb/(HP * hr) per engine
All emission units that do not match a description above	See special condition 12*	

\*This refers to Special Condition 12 in the original permit 032018-001.

- 8) Monthly NO<sub>x</sub> emissions for each emission unit calculated using the following equations:

$$\begin{aligned}
 &NO_x \text{ emissions (tons)} \\
 &= \textit{Throughput} \\
 &\times \textit{Emission unit respective emission factor} \left( \frac{\textit{lb NO}_x}{\textit{throughput}} \right) \\
 &\times \left( \frac{1 \textit{ ton NO}_x}{2000 \textit{ lbs NO}_x} \right)
 \end{aligned}$$

$$\begin{aligned}
 &RICE \text{ added during permit term, NO}_x \text{ emissions (tons)} \\
 &= \textit{Manufacturer's listed maximum horsepower rating} \\
 &\times \textit{Current month's hours of operation recorded from hour meter} \\
 &\times \textit{Emission unit respective emission factor} \left( \frac{\textit{lb NO}_x}{\textit{HP * hr}} \right) \\
 &\times \left( \frac{1 \textit{ ton NO}_x}{2000 \textit{ lbs NO}_x} \right)
 \end{aligned}$$

- 9) Monthly emissions calculated by summing NO<sub>x</sub> emissions from all emission units.
- 10) Consecutive 12-month rolling total NO<sub>x</sub> emissions from all emission units. The emissions shall include all actual emissions, including SSM emissions as well as any excess SSM emissions as reported to the Air Pollution Control Program's Compliance/Enforcement section in accordance with the requirements of 10 CSR 10-6.050, Start-up, Shutdown, and Malfunction Conditions.
- 11) Indication of compliance with Special Condition 2.A.