



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: OP2016-031
Expiration Date: AUG 26 2021
Installation ID: 205-0011
Project Number: 2012-12-048

Installation Name and Address

City of Shelbina Power Plant
104 N Douglas and 410 W Chestnut
Shelbina, MO 63468
Shelby County

Installation Description:

The installation is an electric generating peaking station, consisting of eight (8) engine generating units at two (2) locations with several diesel fuel storage tanks. Seven (7) of the units use diesel fuel and one (1) can use natural gas or diesel fuel. The two (2) newest engines use cooled combustion air for NO_x control. The installation has the potential to be a major source of NO_x emissions.

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Operating Permit Unit

Director of Designee
Department of Natural Resources

AUG 26 2016

Effective Date

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I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION

The installation is an electric generating peaking station, consisting of eight (8) engine generating units at two (2) locations with several diesel fuel storage tanks. Seven (7) of the units use diesel fuel and one (1) can use natural gas or diesel fuel. The two (2) newest engines use cooled combustion air for NO_x control. The installation has the potential to be a major source of NO_x emissions. This installation is not on the list of named installations in 10 CSR 10-6.020(3)(B).

Reported Air Pollutant Emissions, tons per year					
Pollutants	2014	2013	2012	2011	2010
Particulate Matter ≤ Ten Microns (PM ₁₀)	0.0280	0.0123	0.0224	0.0995	0.0270
Particulate Matter ≤ 2.5 Microns (PM _{2.5})	0.0280	0.0123	0.0224	0.0995	0.0270
Sulfur Oxides (SO _x)	0.0009	0.0141	0.0008	0.0505	0.0175
Nitrogen Oxides (NO _x)	2.0874	0.9497	1.1076	3.7647	1.2571
Volatile Organic Compounds(VOC)	0.0491	0.0223	0.0342	0.1375	0.0398
Carbon Monoxide (CO)	0.1255	0.0560	0.1844	0.6529	0.2137
Lead (Pb)	0.00	0.00	0.00	0.00	0.00
Hazardous Air Pollutants (HAPs)	0.00	0.00	0.00	0.00	0.00
Ammonia (NH ₃)	0.00	0.00	0.00	0.00	0.00

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>
G1A	Fairbanks-Morse Electric Generator, 27.8 MMBtu/hr, Blended No.2 Diesel Oil or Pipeline Natural Gas Fueled
G2A	Caterpillar Electric Generator, 13.4 MMBtu/hr, Blended No.2 Diesel Oil Fueled
G3A	Caterpillar Electric Generator, 13.4 MMBtu/hr, Blended No.2 Diesel Oil Fueled
G4A	Caterpillar Electric Generator, 13.4 MMBtu/hr, Blended No.2 Diesel Oil Fueled
G5A	Caterpillar Electric Generator, 13.4 MMBtu/hr, Blended No.2 Diesel Oil Fueled
G6A	Caterpillar Electric Generator, 17.84 MMBtu/hr, Blended No.2 Diesel Oil Fueled

G7A Caterpillar Electric Generator, 19.48 MMBtu/hr, Blended No.2 Diesel Oil Fueled
G8A Caterpillar Electric Generator, 19.48 MMBtu/hr, Blended No.2 Diesel Oil Fueled

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.

Description of Emission Source

Tank DT 1 — 300 gallon diesel fuel day tank for G1A, 1981
Tank DT 2 — 300 gallon diesel fuel day tank for G2A, 1989
Tank DT 3 — 300 gallon diesel fuel day tank for G3A, 1992
Tank DT 4 — 300 gallon diesel fuel day tank for G4A, 1992
Tank DT 5 — 300 gallon diesel fuel day tank for G5A, 1992
Tank DT 6 — 300 gallon diesel fuel day tank for G6A, 1999
Tank DT 7 — 300 gallon diesel fuel day tank for G7A, 2000
Tank DT 8 — 300 gallon diesel fuel day tank for G8A, 2000
Tank.2 — 19,000-gallon capacity, No.2 diesel fuel oil tank, yr. 1991
Tank.4 — 19,000-gallon capacity, No.2 diesel fuel oil tank, yr. 2001
Tank 3 — 26,786-gallon capacity, No.2 diesel fuel oil tank, yr. 1999

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 or 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 10-6.260, Restriction of Emission of Sulfur Compounds

Electric Generator		
Emission Unit	Description	Manufacturer/Model #
G1A	Emergency Electric Generator - Diesel Oil or Pipeline Natural Gas Fueled, 27.8 MMBtu/hr, 3,000 kW, 4191 hp	Fairbanks-Morse, Serial No. 38D879029TDFS12, yr.:1981
<i>See Statement of Basis for explanation for why 10 CSR 10-6.260 is included in the operating permit as an applicable regulation.</i>		

Emission Limitation

- 1) The permittee shall not emit from any new source operation more than five hundred parts per million by volume (500 ppmv) of sulfur dioxide.
- 2) The permittee shall not allow stack gasses to contain more than thirty-five milligrams (35 mg) per cubic meter of sulfuric acid or sulfur trioxide or any combination of those gases averaged on any consecutive three hour time period.

Operational Limitation

The permittee shall not use diesel fuel in Engine G1A with a sulfur content that exceeds 0.05% sulfur.

Monitoring/Recordkeeping

- 1) The permittee shall maintain an accurate record of the sulfur content of fuel used. Fuel purchase receipts, analyzed samples or certifications that verify the fuel type and sulfur content will be acceptable.
- 2) The permittee shall keep and make these records available for inspection to the Department of Natural Resources' personnel upon request.
- 3) The permittee shall maintain the records for five years.

Reporting

- 1) The permittee shall report to the Air Pollution Control Program Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any exceedance of any limitation established by this permit condition.
- 2) Compliance information reports including any deviations from monitoring, recordkeeping and reporting requirements of this permit condition shall be submitted to the Environmental Protection

Agency Region 7 Missouri Air Compliance Coordinator in Lenexa Kansas, 11201 Renner Blvd., Lenexa, KS 66219.

- 3) The permittee shall report any deviations from the standards, monitoring/testing, and reporting requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V of this permit.

PERMIT CONDITION 2 10 CSR 10-6.261, Control of Sulfur Dioxide Emissions

Electric Generator		
Emission Unit	Description	Manufacturer/Model #
G1A	Emergency Electric Generator - Diesel Oil or Pipeline Natural Gas Fueled, 27.8 MMBtu/hr, 3,000 kW, 4191 hp	Fairbanks-Morse, Serial No. 38D879029TDFS12, yr.:1981

Emission Limitation:

Emissions from any new source operation shall not contain more than 8,812 parts per million (ppm_v) of sulfur dioxide for distillate fuel.

Monitoring/Recordkeeping:

- 1) The permittee shall determine compliance using fuel delivery records, fuel sampling and analysis, performance tests, continuous emission monitoring, or other compliance methods approved by the staff director and the U.S. Environmental Protection agency and incorporated into the state implementation plan.
- 2) The permittee must report any excess emissions other than startup, shutdown and malfunction excess emissions to the staff director for each calendar quarter within thirty (30) days following the end of the quarter. In all cases, the notification must be a written report and must include, at a minimum, the following:
 - a) Name and location of source;
 - b) Name and telephone number of person responsible for the source;
 - c) Identity and description of the equipment involved;
 - d) Time and duration of the period of excess emissions;
 - e) Type of activity;
 - f) Estimate of the magnitude of the excess emissions expressed in the units of the applicable emission control regulation and the operating data and calculations used in estimating the magnitude;
 - g) Measures taken to mitigate the extent and duration of the excess emissions; and
 - h) Measures taken to remedy the situation which cause the excess emissions and the measures taken or planned to prevent the recurrence of these situations.
- 3) The permittee must maintain a list of modifications to the source's operating procedures or other routine procedures instituted to prevent or minimize the occurrence of any excess emissions.
- 4) The permittee must maintain a record of data, calculations, results, records and reports from any performance test, continuous emission monitoring, fuel deliveries, and/or fuel sampling tests.

- 5) The permittee must maintain a record of any applicable monitoring data, performance evaluations, calibration checks, monitoring system and device performance tests, and any adjustments and maintenance performed on these systems or devices.
- 6) The permittee of sources using fuel delivery records for compliance must also maintain the fuel supplier information to certify all fuel deliveries. Bills of lading and/or other fuel deliver documentation containing the following information for all fuel purchases or deliveries are deemed acceptable to comply with the requirements of this rule:
 - a) The name, address, and contact information of the fuel supplier;
 - b) The type of fuel; and
 - c) The sulfur content or maximum sulfur content expressed in percent sulfur by weight or in ppm sulfur.
- 7) The permittee of sources using fuel sampling and analysis for compliance must also follow the requirements in 10 CSR 10-6.261(5)(D).
- 8) The permittee of sources using performance testing for compliance must also follow the requirements in 10 CSR 10-6.261(5)(A)
- 9) All required reports and records must be retained on-site for a minimum of five (5) years and made available within five (5) business days upon written or electronic request by the director.
- 10) The permittee must furnish the director all data necessary to determine compliance status.

Reporting:

- 1) The permittee shall report any deviations/exceedances of this permit condition using the semi-annual monitoring report and annual compliance certification to the Air Pollution Control Program’s Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(6)(C)1.C.(III).
- 2) The permittee shall report any deviations from the standards, monitoring/testing, and reporting requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V of this permit.

PERMIT CONDITION 3
 10 CSR 10-6.065(6)(C)2. Voluntary Limitation(s)

Electric Generators		
Emission Unit	Description	Manufacturer/Model #
G1A	Emergency Electric Generator - Diesel Oil or Pipeline Natural Gas Fueled, 27.8 MMBtu/hr, 3,000 kW, 4191 hp	Fairbanks-Morse, Serial No. 38D879029TDFS12, yr.:1981
G2A	Electric Generator - Diesel Oil Fueled, 13.4 MMBtu/hr, 1,600 kW, 2306 hp	Caterpillar Engine, 3516 Genset, Serial No. 25Z01526, yr.:1989
G3A	Electric Generator - Diesel Oil Fueled, 13.4 MMBtu/hr, 1,600 kW, 2306 hp	Caterpillar Engine, 3516 Genset, Serial No. 25Z02315, yr.:1992

G4A	Electric Generator - Diesel Oil Fueled, 13.4 MMBtu/hr, 1,600 kW, 2306 hp	Caterpillar Engine, 3516 Genset, Serial No. 25Z02325, yr.:1992
G5A	Electric Generator - Diesel Oil Fueled, 13.4 MMBtu/hr, 1,600 kW, 2306 hp	Caterpillar Engine, 3516 Genset, Serial No. 25Z02317, yr.:1992
G6A	Electric Generator - Diesel Oil Fueled, 17.84 MMBtu/hr, 1,960 kW, 2628 hp	Caterpillar Engine, 3516B Genset, Serial No., 7RN00395, yr.:1999

Emission Limitation

The permittee shall not emit more than 95.0 tons of nitrogen oxides (NO_x) per twelve (12) consecutive months from all engines at the 410 W. Chestnut location (G1A through G6A).

Monitoring/Recordkeeping

- 1) The permittee shall maintain a monthly record of the amount of fuels consumed adequate to determine the monthly and the consecutive twelve (12) month NO_x emissions from G1A through G6A.
- 2) Attachment A, or an equivalent form, must be used to certify compliance with this requirement by the permittee.
- 3) These records shall be made available for inspection to the Department of Natural Resources' personnel upon request by the permittee.
- 4) All records shall be maintained for five years by the permittee.

Reporting

- 1) The permittee shall report to the Air Pollution Control Program Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any exceedance of any limitation established by this permit condition.
- 2) The permittee shall report any deviations from the standards, monitoring/testing, and reporting requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V of this permit.

PERMIT CONDITION 4
 10 CSR 10-6.060, Construction Permits Required
 Construction Permit and Amendment #052000-014A, Issued April 4, 2002

Electric Generators		
Emission Unit	Description	Manufacturer/Model #
G7A	Electric Generator - Diesel Oil Fueled, 19.48 MMBtu/hr, 2,000 kW, 2,800 hp	Caterpillar Engine, 3516B Genset, Serial No., 7RN01309, yr.:2000
G8A	Electric Generator - Diesel Oil Fueled, 19.48 MMBtu/hr, 2,000 kW, 2,800 hp	Caterpillar Engine, 3516B Genset, Serial No., 7RN01300, yr.:2000

Emission Limitation

The permittee shall not emit more than 53.0 tons of nitrogen oxides (NO_x) in any twelve (12) consecutive month period from all generators at the 104 N. Douglas location (G7A and G8A). [Special Condition #1A]

Monitoring/Recordkeeping

- 1) The permittee shall maintain a monthly record of the fuels consumed adequate to determine the monthly and the consecutive twelve (12) month NO_x emissions from G7A and G8A.
- 2) Attachment B, or an equivalent form, must be used to certify compliance with this requirement by the permittee.
- 3) These records shall be made available for inspection to the Department of Natural Resources' personnel upon request by the permittee.
- 4) All records shall be maintained for five years by the permittee.

Reporting

- 1) The permittee shall report to the Air Pollution Control Program Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any exceedance of any limitation established by this permit condition.
- 2) The permittee shall report any deviations from the standards, monitoring/testing, and reporting requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V of this permit.

PERMIT CONDITION 5
 10 CSR 10-6.075 Maximum Achievable Control Technology Regulations
 40 CFR Part 63, Subpart ZZZZ National Emissions Standards for Hazardous Air Pollutants for
 Stationary Reciprocating Internal Combustion Engines

Electric Generators		
Emission Unit	Description	Manufacturer/Model #
G1A	Emergency Electric Generator - Diesel Oil or Pipeline Natural Gas Fueled, 27.8 MMBtu/hr, 3,000 kW, 4191 hp	Fairbanks-Morse, Serial No. 38D879029TDFS12, yr.:1981

Operational Requirements:

Work Practice Standards:

- 1) For each RICE, the permittee must meet the following requirement (*except during periods of startup*);
 - a) Change oil and filter every 500 hours of operation or annually, whichever comes first; (The permittee has the option to utilize an oil analysis program as described in §63.6625(i) or (j) in order to extend the specified oil change requirement.)[Item 4.a. of Table 2d to Subpart ZZZZ]
 - b) Inspect spark plugs every 1000 hours of operation or annually, whichever comes first, and replace as necessary; and [Item 4.b. of Table 2d to Subpart ZZZZ]
 - c) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary. [Item 4.c. of Table 2d to Subpart ZZZZ]

- 2) 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 other times other than startup in Table 2d applies. [63.6625(h)]

Operational Limitations:

- 1) The permittee must be in compliance with the applicable requirements of MACT ZZZZ at all times. [§63.6605(a)]
- 2) 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. [§63.6605(b)]
- 3) The permittee must demonstrate continuous compliance with each emission limitation, operating limitation, and other requirements in Table 2d to Subpart ZZZZ that apply to you according to methods specified in Table 6 to Subpart ZZZZ. [63.6640(a)]
- 4) The permittee shall operate the emergency stationary RICE according to the requirements in paragraphs §63.6640(f)(1) through (4). In order for the engine to be considered an emergency stationary RICE under 40 CFR 63 Subpart ZZZZ, 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 §63.6640(f)(1) through (4), is prohibited. [§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 §63.6640(f)(2)(i) through (iii) for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by paragraphs §63.6640(f)(3) and (4) counts as part of the 100 hours per calendar year allowed by this paragraph §63.6640(f)(2). [§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 §63.6640(f)(2). Except as provided in paragraphs §63.6640(f)(4)(i) and (ii), 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) through (E)]
- A.) The engine is dispatched by the local balancing authority or local transmission and distribution system operator.
- 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.
- C.) The dispatch follows reliability, emergency operation or similar protocols that follow specific NERC, regional, state, public utility commission or local standards or guidelines.
- D.) The power is provided only to the facility itself or to support the local transmission and distribution system.
- 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 permittee.
- 5) If the permittee does not operate the engine according to the requirements in paragraphs §63.6640(f)(1) through (4), the engine will not be considered an emergency engine under 40 CFR 63 Subpart ZZZZ and must meet all requirements for non-emergency engines. [§63.6640(f)]
- 6) The permittee must operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop 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 Requirements:

- 1) 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 facility's own maintenance plan. [§63.6655(e)]
- 2) The Permittee must keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. 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 operation. If the engine is 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)]

- 3) The permittee must keep a copy of each notification and report submitted to comply with Subpart ZZZZ including all documentation supporting any Initial Notification or Notification of Compliance status. [§63.6655(a)(1)]
- 4) The permittee must keep records of the occurrence and duration of each malfunction of operation or the air pollution control and monitoring equipment. [§63.6655(a)(2)]
- 5) The permittee must keep records of all required maintenance performed on the air pollution control and monitoring equipment. [§63.6655(a)(4)]
- 6) The permittee must keep records of actions taken during periods of malfunction to minimize emissions in accordance with §63.6605(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. [§63.6655(a)(5)]
- 7) The permittee must keep the records required in Table 6 of subpart ZZZZ to show continuous compliance with each emission or operating limitation that applies. [§63.6655(d)]

Reporting:

- 1) The Permittee must report each instance in which an applicable emission limitation or operating limitation in Table 2d to MACT ZZZZ was not met. These instances are deviations from the emission and operating limitations in MACT ZZZZ, and must be reported according to the requirements in §63.6650. [§63.6640(b)]
- 2) The permittee must report each instance in which the permittee did not meet the requirements in Table 8 to Subpart ZZZZ that apply.[63.6640 (e)]
- 3) The permittee must report any deviations from the requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V of this permit.

PERMIT CONDITION 6
 10 CSR 10-6.075 Maximum Achievable Control Technology Regulations
 40 CFR Part 63, Subpart ZZZZ National Emissions Standards for Hazardous Air Pollutants for
 Stationary Reciprocating Internal Combustion Engines

Electric Generators		
Emission Unit	Description	Manufacturer/Model #
G2A	Electric Generator - Diesel Oil Fueled, 13.4 MMBtu/hr, 1,600 kW, 2306 hp	Caterpillar Engine, 3516 Genset, Serial No. 25Z01526, yr.:1989
G3A	Electric Generator - Diesel Oil Fueled, 13.4 MMBtu/hr, 1,600 kW, 2306 hp	Caterpillar Engine, 3516 Genset, Serial No. 25Z02315, yr.:1992
G4A	Electric Generator - Diesel Oil Fueled, 13.4 MMBtu/hr, 1,600 kW, 2306 hp	Caterpillar Engine, 3516 Genset, Serial No. 25Z02325, yr.:1992
G5A	Electric Generator - Diesel Oil Fueled, 13.4 MMBtu/hr, 1,600 kW, 2306 hp	Caterpillar Engine, 3516 Genset, Serial No. 25Z02317, yr.:1992

G6A	Electric Generator - Diesel Oil Fueled, 17.84 MMBtu/hr, 1,960 kW, 2628 hp	Caterpillar Engine, 3516B Genset, Serial No., 7RN00395, yr.:1999
G7A	Electric Generator - Diesel Oil Fueled, 19.48 MMBtu/hr, 2,000 kW, 2,800 hp	Caterpillar Engine, 3516B Genset, Serial No., 7RN01309, yr.:2000
G8A	Electric Generator - Diesel Oil Fueled, 19.48 MMBtu/hr, 2,000 kW, 2,800 hp	Caterpillar Engine, 3516B Genset, Serial No., 7RN01300, yr.:2000

Emission Limitations:

- 1) For each of the engines the permittee must;
 - a) Limit concentration of CO in the stationary RICE exhaust to 23 ppmvd at 15 percent O₂; or
 - b) Reduce CO emissions by 70 percent or more. [Table 2d to Subpart ZZZZ, Item #3]

Operational Requirements:

- 1) The permittee must use diesel fuel in engines G2A through G8A that meets the requirements in 40 CFR 80.510(b) for nonroad diesel fuel. [§63.6604(a)]
- 2) The permittee must be in compliance with the applicable requirements of MACT ZZZZ at all times. [§63.6605(a)]
- 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. [§63.6605(b)]
- 4) During periods of startup the permittee must minimize the engine's time spent at idle and minimize the engine's startup time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the non-startup emission limitations apply. [§63.6625(h)]
- 5) The permittee must meet the following operating limitation, except during periods of startup;
 - a) maintain the catalyst so that the pressure drop across the catalyst does not change by more than 2 inches of water from the pressure drop across the catalyst that was measured during the initial performance test; and
 - b) maintain the temperature of the stationary RICE exhaust so that the catalyst inlet temperature is greater than or equal to 450 °F and less than or equal to 1350 °F. (The permittee can petition the Administrator pursuant to the requirements of 40 CFR 63.8(f) for a different temperature range.) [Table 2b to MACT ZZZZ. Item #2]
- 6) If the permittee changes the catalyst, the permittee must reestablish the values of the operating parameters measured during the initial performance test. When the permittee reestablishes the values of the operating parameters, the permittee must also conduct a performance test to demonstrate that the applicable emission limit is met for the stationary RICE. [§63.6640(b)]

Continuous Compliance Requirements:

- 1) The permittee must demonstrate continuous compliance with each emission limitation, operating limitation and other applicable requirements in Tables 2b and Table 2d to MACT ZZZZ, according to methods specified in Table 6 to MACT ZZZZ. [§63.6640(a)]

- 2) If the affected CI engine is not equipped with a closed crankcase ventilation system, The permittee must:
 - a) Install a closed crankcase ventilation system that prevents crankcase emissions from being emitted to the atmosphere, or
 - b) Install an open crankcase filtration emission control system that reduces emissions from the crankcase by filtering the exhaust stream to remove oil mist, particulates and metals. [§63.6625(g)]
- 3) The permittee must follow the manufacturer's specified maintenance requirements for operating and maintaining the open or closed crankcase ventilation systems and replacing the crankcase filters, or can request the Administrator to approve different maintenance requirements that are as protective as manufacturer requirements. [§63.6625(g)]
- 4) If the permittee has elected to install a CEMS as specified in Table 5 of MACT ZZZZ, the permittee must install, operate, and maintain a CEMS to monitor CO and either O₂ or CO₂ according to the requirements in paragraphs §63.6625(a)(1) through (4). If the permittee is meeting a requirement to reduce CO emissions, the CEMS must be installed at both the inlet and outlet of the control device. If the permittee is meeting a requirement to limit the concentration of CO, the CEMS must be installed at the outlet of the control device. [§63.6625(a)]
- 5) If the permittee has elected to install a continuous parameter monitoring system (CPMS) as specified in Table 5 of MACT ZZZZ, the permittee must install, operate, and maintain each CPMS according to the requirements in paragraphs §63.6625(b)(1) through (6). [§63.6625(b)]
 - a) The permittee must prepare a site-specific monitoring plan that addresses the monitoring system design, data collection, and the quality assurance and quality control elements outlined in paragraphs (b)(1)(i) through (v) of this section and in §63.8(d). As specified in §63.8(f)(4), the permittee may request approval of monitoring system quality assurance and quality control procedures alternative to those specified in paragraphs (b)(1) through (5) of this section in the site-specific monitoring plan. [§63.6625(b)(1)]
 - i) The performance criteria and design specifications for the monitoring system equipment, including the sample interface, detector signal analyzer, and data acquisition and calculations; [§63.6625(b)(1)(i)]
 - ii) Sampling interface (*e.g.*, thermocouple) location such that the monitoring system will provide representative measurements; [§63.6625(b)(1)(ii)]
 - iii) Equipment performance evaluations, system accuracy audits, or other audit procedures; [§63.6625(b)(1)(iii)]
 - iv) Ongoing operation and maintenance procedures in accordance with provisions in §63.8(c)(1)(ii) and (c)(3); and [§63.6625(b)(1)(iv)]
 - v) Ongoing reporting and recordkeeping procedures in accordance with provisions in §63.10(c), (e)(1), and (e)(2)(i). [§63.6625(b)(1)(v)]
 - b) The permittee must install, operate, and maintain each CPMS in continuous operation according to the procedures in the site-specific monitoring plan. [§63.6625(b)(2)]
 - c) The CPMS must collect data at least once every 15 minutes (see also §63.6635). [§63.6625(b)(3)]
 - d) For a CPMS for measuring temperature range, the temperature sensor must have a minimum tolerance of 2.8 degrees Celsius (5 degrees Fahrenheit) or 1 percent of the measurement range, whichever is larger. [§63.6625(b)(4)]

- e) The permittee must conduct the CPMS equipment performance evaluation, system accuracy audits, or other audit procedures specified in the site-specific monitoring plan at least annually. [§63.6625(b)(5)]
- f) The permittee must conduct a performance evaluation of each CPMS in accordance with the site-specific monitoring plan. [§63.6625(b)(6)]

Monitoring:

- 1) The permittee shall monitor and collect data as follows: [§63.6635(a)]
 - a) Except for monitor malfunctions, associated repairs, required performance evaluations, and required quality assurance or control activities, the permittee shall monitor continuously at all times that the stationary RICE is operating. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions. [§63.6635(b)]
 - b) The permittee may not use data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities in data averages and calculations used to report emission or operating levels. The permittee shall, however, use all the valid data collected during all other periods. [§63.6635(c)]

Continuous Compliance Requirements

- 1) The permittee shall demonstrate continuous compliance by:
 - a) Conducting performance tests every 8,760 hrs or 3 yrs, whichever comes 1st, for CO to demonstrate that the required CO % reduction is achieved or that the emissions remain at or below the CO concentration. limit; and
 - b) Collecting the catalyst inlet temp. data according to §63.6625(b); and
 - c) Reducing these data to 4-hr rolling averages; and
 - d) Maintaining the 4-hr rolling averages within the operating limits for the catalyst inlet temperature.; and
 - e) Measuring the pressure drop across the catalyst once per month and demonstrating that the pressure drop across the catalyst is within the operating limit established during the performance test. [Table 6 to Subpart ZZZZ of Part 63, Item #10]

Repeat Performance Testing:

- 1) The permittee must conduct each performance test in Tables 3 and 4 of Subpart ZZZZ that applies to them. [§63.6620(a)]
- 2) Each performance test must be conducted according to the requirements that Subpart ZZZZ specifies in Table 4 of Subpart ZZZZ. If the permittee owns or operates a non-operational stationary RICE that is subject to performance testing, The permittee does not need to start up the engine solely to conduct the performance test. The permittee can conduct the performance test when the engine is started up again. [§63.6620(b)]
- 3) The engine percent load during a performance test must be determined by documenting the calculations, assumptions, and measurement devices used to measure or estimate the percent load in a specific application. A written report of the average percent load determination must be included in the notification of compliance status. The following information must be included in the written report: the engine model number, the engine manufacturer, the year of purchase, the manufacturer's site-rated brake horsepower, the ambient temperature, pressure, and humidity during the

performance test, and all assumptions that were made to estimate or calculate percent load during the performance test must be clearly explained. If measurement devices such as flow meters, kilowatt meters, beta analyzers, stain gauges, etc. are used, the model number of the measurement device, and an estimate of its accurate in percentage of true value must be provided. [§63.6620(i)]

Notifications:

- 1) The permittee shall submit a Notification of Intent to conduct a performance test at least 60 days before the performance test is scheduled to begin as required in §63.7(b)(1). [§63.6645(g)]
- 2) The permittee shall submit a Notification of Compliance Status according to §63.9(h)(2)(ii). [§63.6645(h)]

Recordkeeping:

- 1) The permittee shall retain the records described in §63.6655(a)(1) through (a)(5), and §63.6655(b)(1) through (b)(3). [§63.6655(a)]
 - a) A copy of each notification and report that the permittee submitted to comply with this subpart, including all documentation supporting any Initial Notification or Notification of Compliance Status that the permittee submitted, according to the requirement in §63.10(b)(2)(xiv). [§63.6655(a)(1)]
 - b) Records of the occurrence and duration of each malfunction of operation (*i.e.*, process equipment) or the air pollution control and monitoring equipment. [§63.6655(a)(2)]
 - c) Records of performance tests and performance evaluations as required in §63.10(b)(2)(viii). [§63.6655(a)(3)]
 - d) Records of all required maintenance performed on the air pollution control and monitoring equipment. [§63.6655(a)(4)]
 - e) Records of actions taken during periods of malfunction to minimize emissions in accordance with §63.6605(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. [§63.6655(a)(5)]
- 2) For each CEMS or CPMS, the permittee must keep the records listed in paragraphs (b)(1) through (3) of this section. [§63.6655(b)]
 - a) Records described in §63.10(b)(2)(vi) through (xi). [§63.6655(b)(1)]
 - b) Previous (*i.e.*, superseded) versions of the performance evaluation plan as required in §63.8(d)(3). [§63.6655(b)(2)]
 - c) Requests for alternatives to the relative accuracy test for CEMS or CPMS as required in §63.8(f)(6)(i), if applicable. [§63.6655(b)(3)]
- 3) The permittee shall retain the records required in Table 6 of MACT ZZZZ to show continuous compliance with each emission or operating limit that applies. [§63.6655(d)]
- 4) 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 own maintenance plan if the permittee own or operate any of the following stationary RICE; [§63.6655(e)]
 - a) An existing stationary RICE located at an area source of HAP emissions subject to management practices as shown in Table 2d to this subpart. [§63.6655(e)(3)]
- 5) The permittee shall retain each record readily accessible in hard copy or electronic form for at least five years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to §63.10(b)(1). [§63.6660(c)]

- 6) These records shall be kept on-site, and shall be made available to Department personnel upon request by the permittee.

Reporting:

- 1) The permittee must report each instance in which each applicable emission limitation or operating limitation in Table 2d to MACT ZZZZ is not met. These instances are deviations from the emission and operating limitations in MACT ZZZZ. These deviations must be reported according to the requirements in §63.6650. [§63.6640(b)]
- 2) The permittee shall submit each report in Table 7 of MACT ZZZZ that applies. [§63.6650(a)]
- 3) Unless the Administrator has approved a different schedule for submission of reports under §63.10(a), the permittee shall submit each report by the date in Table 7 of MACT ZZZZ and according to the requirements in paragraphs §63.6650(b)(1) through (b)(9): [§63.6650(b)]
 - a) For semiannual Compliance reports, the first Compliance report must cover the period beginning on the compliance date that is specified for the affected source in §63.6595 and ending on June 30 or December 31, whichever date is the first date following the end of the first calendar half after the compliance date that is specified for the source in §63.6595. [§63.6650(b)(1)]
 - b) For semiannual Compliance reports, the first Compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date follows the end of the first calendar half after the compliance date that is specified for the affected source in §63.6595. [§63.6650(b)(2)]
 - c) For semiannual Compliance reports, each subsequent Compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31. [§63.6650(b)(3)]
 - d) For semiannual Compliance reports, each subsequent Compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period. [§63.6650(b)(4)]
 - e) The permittee may submit the first and subsequent Compliance Reports as part of their 40 CFR Part 70 semi-annual Compliance Reports instead of according to the dates in paragraphs §63.6650(b)(1) through (b)(4). [§63.6650(b)(5)]
- 4) The Compliance report must contain the information in paragraphs §63.6650 (c)(1) through (6): [§63.6650(c)]
 - a) Company name and address. [§63.6650(c)(1)]
 - b) Statement by a responsible official, with that official's name, title, and signature, certifying the accuracy of the content of the report. [§63.6650(c)(2)]
 - c) Date of report and beginning and ending dates of the reporting period. [§63.6650(c)(3)]
 - d) If the permittee had a malfunction during the reporting period, the compliance report must include the number, duration, and a brief description for each type of malfunction which occurred during the reporting period and which caused or may have caused any applicable emission limitation to be exceeded. The report must also include a description of actions taken by the permittee during a malfunction of an affected source to minimize emissions in accordance with §63.6605(b), including actions taken to correct a malfunction. [§63.6650(c)(4)]
 - e) If there are no deviations from any emission or operating limitations that apply, a statement that there were no deviations from the emission or operating limitations during the reporting period. [§63.6650(c)(5)]
 - f) If there were no periods during which the continuous monitoring system (CMS), including CEMS and CPMS, was out-of-control, as specified in §63.8(c)(7), a statement that there were no periods during which the CMS was out-of-control during the reporting period. [§63.6650(c)(6)]

- 5) For each deviation from an emission or operating limitation that occurs for a stationary RICE where the permittee are not using a CMS to comply with the emission or operating limitations in this subpart, the Compliance report must contain the information in paragraphs (c)(1) through (4) of this section and the information in paragraphs (d)(1) and (2) of this section. [§63.6650(d)]
 - a) The total operating time of the stationary RICE at which the deviation occurred during the reporting period. [§63.6650(d)(1)]
 - b) Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken. [§63.6650(d)(2)]
- 6) For each deviation from an emission or operating limit, the permittee shall include the information in §63.6650(c)(1) through (4) and §63.6650(e)(1) through (12): [§63.6650(e)]
 - a) The date and time that each malfunction started and stopped. [§63.6650(e)(1)]
 - b) The date, time, and duration that each CMS was inoperative, except for zero (low-level) and high-level checks. [§63.6650(e)(2)]
 - c) The date, time, and duration that each CMS was out-of-control, including the information in §63.8(c)(8). [§63.6650(e)(3)]
 - d) The date and time that each deviation started and stopped, and whether each deviation occurred during a period of malfunction or during another period. [§63.6650(e)(4)]
 - e) A summary of the total duration of the deviation during the reporting period, and the total duration as a percent of the total source operating time during that reporting period. [§63.6650(e)(5)]
 - f) A breakdown of the total duration of the deviations during the reporting period into those that are due to control equipment problems, process problems, other known causes, and other unknown causes. [§63.6650(e)(6)]
 - g) A summary of the total duration of CMS downtime during the reporting period, and the total duration of CMS downtime as a percent of the total operating time of the stationary RICE at which the CMS downtime occurred during that reporting period. [§63.6650(e)(7)]
 - h) An identification of each parameter and pollutant (CO or formaldehyde) that was monitored at the stationary RICE. [§63.6650(e)(8)]
 - i) A brief description of the stationary RICE. [§63.6650(e)(9)]
 - j) A brief description of the CMS. [§63.6650(e)(10)]
 - k) The date of the latest CMS certification or audit. [§63.6650(e)(11)]
 - l) A description of any changes in CMS, processes, or controls since the last reporting period. [§63.6650(e)(12)]
- 7) The permittee shall report all deviations as defined in MACT ZZZZ in the semi-annual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A). If the permittee submits a Compliance Report pursuant to Table 7 of MACT ZZZZ along with, or as part of, the semi-annual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A), and the Compliance Report includes all required information concerning deviations from any emission or operating limit in MACT ZZZZ, submission of the Compliance Report shall be deemed to satisfy any obligation to report the same deviations in the semi-annual monitoring report. However, submission of a Compliance Report shall not otherwise affect any obligation the permittee may have to report deviations from permit requirements to the Air Pollution Control Program. [§63.6650(f)]
- 8) Required reports 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.

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 permittee 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 10-6.100 Alternate Emission Limits

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

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

- 1) The permittee shall 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 10-6.170

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 10-6.165 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 10-6.250 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.

Title VI – 40 CFR Part 82 Protection of Stratospheric Ozone

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

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

10 CSR 10-6.280 Compliance Monitoring Usage

- 1) The permittee is not prohibited from using the following in addition to any specified compliance methods for the purpose of submission of compliance certificates:
 - a) Monitoring methods outlined in 40 CFR Part 64;
 - b) Monitoring method(s) approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
 - c) Any other monitoring methods approved by the director.
- 2) Any credible evidence may be used for the purpose of establishing whether a permittee has violated or is in violation of any such plan or other applicable requirement. Information from the use of the

following methods is presumptively credible evidence of whether a violation has occurred by a permittee:

- a) Monitoring methods outlined in 40 CFR Part 64;
 - b) A monitoring method approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
 - c) Compliance test methods specified in the rule cited as the authority for the emission limitations.
- 3) The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
- a) Applicable monitoring or testing methods, cited in:
 - i) 10 CSR 10-6.030, "Sampling Methods for Air Pollution Sources";
 - ii) 10 CSR 10-6.040, "Reference Methods";
 - iii) 10 CSR 10-6.070, "New Source Performance Standards";
 - iv) 10 CSR 10-6.080, "Emission Standards for Hazardous Air Pollutants"; or
 - b) Other testing, monitoring, or information gathering methods, if approved by the director, that produce information comparable to that produced by any method listed above.

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. Supplemental reports are required no later than ten days after any exceedance of any applicable rule, regulation or other restriction. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
 - 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.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)12 Responsible Official

The application utilized in the preparation of this permit was signed by Mr. Al Dimmitt, Mayor. 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.

STATEMENT OF BASIS

Permit Reference Documents

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

- 1) Part 70 Operating Permit Application, received December 26, 2012;
- 2) 2012 Emissions Inventory Questionnaire, received February 8, 2013; and
- 3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition.
- 4) Construction Permit #1091-002, Issued October 28, 1991
- 5) Construction Permit #0299-016, Issued March 23, 1999
- 6) Construction Permit #052000-014, Issued May 9, 2000
- 7) Construction Permit #052000-014 Amendment, Issued April 4, 2002

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.

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

This rule applies to the diesel generator G1A. G2A through G8A are not subject to this rule because they have a more stringent sulfur content limitation under 40 CFR Part 63 Subpart ZZZZ. They are exempt per 10 CSR 10-6.261(1)(C)2.

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

This rule does not apply to internal combustion engines operated outside the Kansas City or St. Louis metropolitan areas.

Since the storage tanks are VOC/HAP emitting sources, it is highly unlikely the tanks will be capable of exceeding the opacity standards of this rule; therefore, this rule is not included in the operating permit.

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

Process weight is defined to “exclude liquids and gases used solely as fuels and air introduced for purposes of combustion.” For the internal combustion engines (ICEs) at this installation, the throughputs only consist of gaseous/liquid fuels and combustion air. Therefore, there are no applicable throughputs for the ICEs and the other emission sources at this installation have no or insignificant particulate emissions. Therefore, no emission sources at this installation were considered to be applicable to this regulation and it was not included in the operating permit.

Construction Permits

- 1) Construction Permit #1091-002, Issued October 28, 1991
This permit was issued for the installation of three 2306 horsepower diesel fired internal combustion engines (G3A, G4A, and G5A). This permit contained special conditions limiting the operating hours of the engines to 1,000 hours per year. The installation requested an emission limitation of 100.0 tons per year of NO_x in Construction Permit #0299-016 to supersede the operating hours limitation.
- 2) Construction Permit #0299-016, Issued March 23, 1999
This permit was issued for two diesel fired internal combustion engines, G6A and G2A. This permit contains a 100.0 ton per year NO_x emission limitation for the equipment at the facility at the time (G1A through G6A). The installation requested a stricter emission limit of 95.0 tons per year of NO_x and therefore the construction permit limit is not included.
- 3) Construction Permit #052000-014, Issued May 9, 2000
This permit was issued for the installation of four diesel fired internal combustion engines. Two (2) of the units, G7A and G8A, have been installed and are operational. There is no schedule for the completion of the project at the time this operating permit was issued. The permittee should be aware that continuation of the project requires additional approval of the Air Pollution Control Program, since the new source review (NSR) permit is revoked if construction or modification work is not begun within two (2) years from the date of issuance of the permit or if work is suspended for one (1) year. This permit contains special conditions which appear in this operating permit in Permit Condition 4.
- 4) Construction Permit #052000-014 Amendment, Issued April 4, 2002.
This amendment updated the NO_x emission factor of the construction permit from 371.2 to 172.9 pounds per 1000 gallons of fuel based on performance testing conducted December 4, 2001.

New Source Performance Standards (NSPS) Applicability

40 CFR Part 60, Subpart Ka, *Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification commenced After May 18, 1978, and Prior to July 23, 1984*

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

Tank DT1 was installed in the date window for Subpart Ka but is below the reporting threshold and is not subject to Subpart Ka.

Tanks DT2, DT3, DT4, DT5, DT6, DT7, DT8, tank 2, and tank 4 were installed after 1984 but are below the reporting threshold and are not subject to Subpart Kb.

Tank 3 was installed after 1984 and has a capacity above the reporting threshold but does not contain a petroleum liquid according to the definition in Subpart Ka; this tank is not subject to Subpart Kb.

Description	Capacity	Date Placed in Service
Tank DT 1 — Diesel fuel day tank for G1A	300 gallons	1981
Tank DT 2 — Diesel fuel day tank for G2A	300 gallons	1989
Tank DT 3 — Diesel fuel day tank for G3A	300 gallons	1992
Tank DT 4 — Diesel fuel day tank for G4A	300 gallons	1992

Description	Capacity	Date Placed in Service
Tank DT 5 — Diesel fuel day tank for G5A	300 gallons	1992
Tank DT 6 — Diesel fuel day tank for G6A	300 gallons	1999
Tank DT 7 — Diesel fuel day tank for G7A	300 gallons	2000
Tank DT 8 — Diesel fuel day tank for G8A	300 gallons	2000
Tank 2 — No.2 diesel fuel oil tank	19,000 gallons	1991
Tank 3 — No.2 diesel fuel oil tank	26,786 gallons	1999
Tank 4 — No.2 diesel fuel oil tank	19,000 gallons	2001

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

This rule applies to compression ignition engines that were constructed after July 11, 2005. The engines at this installation were constructed prior to the applicability date and therefore the rule does not apply.

Maximum Achievable Control Technology (MACT) Applicability

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

The installation has eight compression ignition internal combustion engines constructed prior to June 12, 2006 located at an area source of HAP that are subject to the requirements of this rule.

40 CFR Part 63 Subpart ZZZZ is applicable to Engines G2A, G3A, G4A, G5A, G6A, G7A, and G8A and has been applied in Permit Condition 6.

Engine G1A is subject to 40 CFR Part 63 Subpart ZZZZ and it has been applied in Permit Condition 5.

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

On May 13, 2010, EPA issued the GHG Tailoring Rule which set the major source threshold for CO₂e to be 100,000 tons per year within 40 CFR Part 70. As of July 1, 2011, all Title V operating permits are required to include GHG emissions. Potential emissions of greenhouse gases (CO₂e) for this installation are calculated to be 9,495 tons, classifying the installation as a minor source of GHGs.

Should the installation’s actual greenhouse gas emissions exceed the 25,000 metric ton threshold, it would be subject to 40 CFR Part 98 - *Mandatory Greenhouse Gas Reporting Rule*. In addition, Missouri regulations do not require the installation to report CO₂ emissions in their Missouri Emissions Inventory Questionnaire; therefore, the installation’s actual CO₂ emissions were not included within this permit.

Updated Potential to Emit for the Installation

Pollutant	Potential to Emit (tons/yr) At NO _x Limits
CO	12.73
HAP	.25
NO _x	less than 148
PM ₁₀	3.82
PM ₂₅	3.82
SO _x	0.42
VOC	6.43

Engine G1A potential fuel requirement was evaluated at 500 hours of operation at maximum capacity to be 101,450 gallons. The amount of remaining fuel that could be used in Engines G2A to G6A of 213,120 gallons was determined from the annual emission limit of 95 tons per year and the NOX emission factor. This fuel amount was evenly distributed to G2A to G6A as 42,624 gallons per year. The potential fuel for G7A and G8A of 613,071 gallons (306,535 gallons for each engine) was determined from the NOX emission limit of 53 tons per year and the NOX emission factor measured during performance testing. These potential fuel amounts and the emission factors from the 2015 EIQ were used to determine the annual potential emissions listed above.

Other Regulatory Determinations

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

This rule was rescinded from the Missouri Code of State Regulations Rules on November 30, 2015, however it has not been removed from the State Implementation Plan (SIP) as of the issuance of this operating permit. This rule will remain in the operating permit until it is removed from the SIP. This rule applies to the diesel generator G1A. G2A through G8A are not subject to this rule because they have a more stringent sulfur content limitation under 40 CFR Part 63 Subpart ZZZZ. The use of ultra low sulfur fuel in these units ensures compliance with the limits.

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

The Acid Rain rules (40 CFR Part 72-75) applicability is shown in the following table.

Emission Unit #	Year	Size	Acid Rain Applicability Determination
G1A	1981	3.0 MW	Exempt per 40 CFR 72.6(b)(2)
G2A	1989	1.6 MW	Exempt per 40 CFR 72.6(b)(2)
G3A	1992	1.6 MW	New unit exemption effective 12/13/1994
G4A	1992	1.6 MW	New unit exemption effective 12/13/1994
G5A	1992	1.6 MW	New unit exemption effective 12/13/1994
G6A	1999	1.96 MW	New unit exemption effective 01/01/1999
G7A	2000	2.0 MW	New unit exemption effective 01/01/2000

G8A	2000	2.0 MW	New unit exemption effective 01/01/2000
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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

The draft Part 70 Operating Permit for City of Shelbina Power Plant (205-0011) was placed on public notice as of May 20, 2016 for a 30-day comment period. The public notice was published on the Department of Natural Resources' Air Pollution Control Program's web page at: <http://www.dnr.mo.gov/env/apcp/PermitPublicNotices.htm>. On June 21 the Air Pollution Control Program received comments from Mark Smith, EPA Region 7 and on June 2, comments were received on behalf of the City of Shelbina. The comments are addressed below in the order in which they appear within the letter.

Comment #1 (from Mark Smith, EPA Region 7): Section III: Specific Emission Limitations Permit Condition 1, This permit condition indicates that it is “federally enforceable only.” Consistent with Clean Air Act §504(a) and implementing regulations found at 40 CFR 70.6(a)(1), each Title V permit “shall include emissions limitations and standards, including those operational requirements and limitations that ensure compliance with all applicable requirements at the time of permit issuance.” The requirements in 10 CSR 10-6.260, *Restriction of Emission of Sulfur Compounds*,” for the purpose of the Title V, or Part 70 air operating permit programs (see, the definition of “applicable requirement” in 40 CFR 70.2). This means that MDNR, as an approved Title V permitting agency, must incorporate the terms of any applicable standard in the operating permit, independent of whether it has separate authority for such rules. As long as standards are referenced in the permit with sufficient detail, the Title V obligations are generally met. Therefore, EPA strongly recommends that MDNR remove the reference to “*federally enforceable only*.” (emphasis added).

Response to Comment: The statement that 10 CSR 10-6.260 is federally enforceable only has been removed from Permit Condition 1 and also from the Statement of Basis.

Comment #2 (from Mark Smith, EPA Region 7): Section III: Specific Emission Limitations Permit Condition 3 indicates the City of Shelbina has accepted a voluntary limitation on emission of nitrogen oxides (NOx) as allowed by 10 CSR 10-6.065(6)(C)2. However, it appears that the NOx limits for the six (6) engine-generator sets, identified in Permit Condition 3, were established by Permit to Construct #0299-016A issued by MDNR in March 1999.

Response to Comment: Construction Permit 0299-016A limits the emission of NOx at the installation to less than 100 tons in any consecutive 12 month period. The “installation” is defined as equipment at the facility at the time the permit is issued. Construction Permit 052000-014 was issued May 9, 2000 and authorized the construction of additional units including four diesel-fired electric generators. These new units are limited to 53.0 tons/year NOx in any consecutive 12-month period. Those combined limits do not keep the installation under the 100 ton/year major source threshold, therefore the permittee requested the voluntary plant-wide 95.0 ton/year NOx emission limit be included in the operating permit. No change has been made to Permit Condition 3.

Comment #3 (from Mark Smith, EPA Region 7): Section III: Specific Emission Limitations Permit Condition 4 relies on an emission factor developed in 2001 to track compliance with the nitrogen oxide (NOx) emissions from emission units G7A and G8A. EPA recommends MDNR include a periodic performance stack test requirement in Permit Condition 4, as allowed by 10 CSR 10-6.065(6)(C)1.C.(I)b. to occur at least once during the term of the operating permit.

Response to Comment: NO_x emissions are a result of fuel-bound nitrogen and thermal NO_x due to the combustion process. Because EU G7A and EUG8A are subject to 40 CFR Part 63 Subpart ZZZZ, the fuel used in the units is limited to low sulfur diesel fuel. Also, the MACT requires work practices which ensure the upkeep and maintenance of the engines such that thermal NO_x should not vary greatly. The reported NO_x emissions for the entire installation have not exceeded 10 tons/year since the engines were permitted. Because of the MACT requirements applicable to the engines and the fact that the plant-wide reported emissions are historically less than 20% of the limit imposed on G7A and G8A alone, repeated performance testing is not being required by the operating permit at this time.

Comment #4 (from Mark Smith, EPA Region 7): Section III: Specific Emission Limitations Permit Condition 5 incorporates applicable requirements associated with MACT ZZZZ for EU G1A – Emergency Generator.

- There are several references to “this subpart” and Permit Condition 5 does not contain subparts;
- Operational Limitation 4)C)i) begins “Prior to May 3, 2014”. Clearly, this permit will be issued after May 3, 2014 and therefore this limitation may no longer be applicable.
- Reporting requirement 3 directs the permittee to report according to Section V. However, MDNR relies on EPA to manage the compliance activities for area source HAP MACTs and therefore, the reporting of deviations in Permit Condition 5 should be identical to the deviation reporting in permit Condition 6.

Response to Comment: The references to “this subpart” have been replaced with “Subpart ZZZZ.” Operational Limitation 4) C) i) has been removed from Permit Condition 5. A requirement for the permittee to report to EPA Region & in Lenexa Kansas has been added to the Reporting section of Permit Condition 5.

Comment #5 (from Mark Smith, EPA Region 7): Section III: Specific Emission Limitations Permit Condition 6 incorporates applicable requirements associated with MACT ZZZZ for EU G1A – Emergency Generator.

- There are several references to “this subpart” and Permit Condition 5 does not contain subparts;
- Notification requirement 1) directs the permittee submit notifications according to several 40 CFR Part 63 General Provisions. It would appear that many, if not all, of these general provision notifications should have already been submitted and most, if not all, of reporting requirement 3) may no longer be applicable.

Response to Comment: The references to “this subpart” have been replaced with “Subpart ZZZZ.” Notification requirement 1) has been removed from permit Condition 5.

Comment #6 (from Mark Smith, EPA Region 7): Attachment B (NO_x Compliance Worksheet for G7A and G8A) includes an unreferenced emission factor, although the Statement of Basis indicates it was developed based on a performance test conducted December 4, 2001. The Statement of Basis is not an actual part of the permit and therefore the emission factor reference should be included on Attachment B.

Response to Comment: A statement has been added to the attachment that the NO_x emission factor is based on performance testing conducted December 4, 2001.

Comment #7 (from Chris Schreiber on behalf of City of Shelbina): Page 18, item (f) should be deleted since the initial compliance report has been submitted.

Response to Comment: Agreed, item (f) has been removed from Permit Condition 6, Reporting.

Comment #8 (from Chris Schreiber on behalf of City of Shelbina): Statement of Basis page SB-5, the compliance calculations for 10 CSR 10-6.260 should be updated or removed.

Response to Comment: Agreed the compliance calculations have been replaced with the statement that using ultra low sulfur fuel will ensure compliance with the regulation.

Mr. Al Dimmitt
City of Shelbina Power Plant
116 E Walnut
Shelbina, MO 63468

Re: City of Shelbina Power Plant, 205-0011
Permit Number: OP2016-031

Dear Mr. Dimmitt:

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:jwj

Enclosures

c: PAMS File: 2012-12-048