



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: OP2013-052
Expiration Date: OCT 17 2018
Installation ID: 077-0164
Project Number: 2011-06-072

Installation Name and Address

McCartney Generating Station
5701 East Farm Road 112
Strafford, MO 65757
Greene County

Parent Company's Name and Address

City Utilities of Springfield
301 E. Central
Springfield, MO 65801-0551

Installation Description:

McCartney Generating Station is an electrical generation peaking plant located northeast of Springfield, Missouri. The primary emissions sources are four natural gas/fuel oil (as backup) turbine engines currently in operation. Other sources of emissions include fuel purging and venting, a paved service road and miscellaneous minor processes ancillary to plant operations. The turbines are affected units under the Acid Rain Program and are a major source for greenhouse gas emissions, thus requiring the facility to obtain a Part 70 operating permit.

OCT 18 2013

Effective Date


Director or Designee
Department of Natural Resources

Table of Contents

I. INSTALLATION DESCRIPTION AND EQUIPMENT LISTING	3
INSTALLATION DESCRIPTION	3
EMISSION UNITS WITH LIMITATIONS	3
EMISSION UNITS WITHOUT LIMITATIONS	4
II. PLANT WIDE EMISSION LIMITATIONS.....	5
III. EMISSION UNIT SPECIFIC EMISSION LIMITATIONS	6
EU0001 THROUGH EU0004 COMBUSTION TURBINES.....	6
PERMIT CONDITION (EU0001 through EU0004)-001	6
10 CSR 10-6.060 Construction Permits Required.....	6
Construction Permit 122000-008, Issued December 13, 2000	6
Construction Permit 122000-008A, Issued May 17, 2005	6
PERMIT CONDITION (EU0001 through EU0004)-002	8
10 CSR 10-6.070, New Source Performance Regulations	8
40 CFR Part 60, Subpart GG Standards of Performance for Stationary Gas Turbines	8
PERMIT CONDITION (EU0001 through EU0004)-003	11
10 CSR 10-6.270 Acid Rain Source Permits Required.....	11
PERMIT CONDITION (EU0001 through EU0004)-004	11
10 CSR 10-6.360 Clean Air Interstate Rule Annual NOx Trading Program.....	11
10 CSR 10-6.364 Clean Air Interstate Rule Seasonal NOx Trading Program	11
10 CSR 10-6.366 Clean Air Interstate Rule SOx Trading Program.....	11
IV. CORE PERMIT REQUIREMENTS	13
V. GENERAL PERMIT REQUIREMENTS.....	19
VI. ATTACHMENTS	25
ATTACHMENT A	26
ATTACHMENT B	27
ATTACHMENT C	28
ATTACHMENT D	29
ATTACHMENT E	32
ATTACHMENT F.....	38

I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION

McCartney Generating Station is an electrical generation peaking plant located northeast of Springfield, Missouri. The primary emissions sources are four natural gas/fuel oil (as backup) turbine engines currently in operation. Other sources of emissions include fuel purging and venting, a paved service road and miscellaneous minor processes ancillary to plant operations. The turbines are affected units under the Acid Rain Program and are a major source for greenhouse gas emissions, thus requiring the facility to obtain a Part 70 operating permit.

Reported Air Pollutant Emissions, tons per year					
Pollutants	2012	2011	2010	2009	2009
Particulate Matter ≤ Ten Microns (PM ₁₀)	1.79	0.56	1.78	0.66	0.95
Particulate Matter ≤ 2.5 Microns (PM _{2.5})	1.79	0.56	1.78	0.66	0.95
Sulfur Oxides (SO _x)	0.19	0.08	0.24	0.09	0.12
Nitrogen Oxides (NO _x)	41.24	15.11	48.81	23.38	29.65
Volatile Organic Compounds(VOC)	0.77	0.40	1.23	0.41	0.61
Carbon Monoxide (CO)	29.05	14.58	40.67	14.73	21.29
Lead (Pb)	---	---	---	---	---
Hazardous Air Pollutants (HAPs)	0.20	0.08	0.25	0.09	0.33

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>
EU0001	Combustion Turbine Engine 1A
EU0002	Combustion Turbine Engine 1B
EU0003	Combustion Turbine Engine 2A
EU0004	Combustion Turbine Engine 2B

EMISSION UNITS WITHOUT 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

No. 2 Fuel Oil Storage Tanks

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.

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.

EU0001 through EU0004 Combustion Turbines			
Emission Unit	Description	Manufacturer/ Model #	2011 EIQ Reference #
EU0001	Combustion Turbine Engine 1A Maximum Hourly Design Rate (MHDR) = 265.30 MMBtu/hr (NG) and 272.00 MMBtu/hr (No. 2 FO)	Pratt & Whitney FT-8 Aero	E01
EU0002	Combustion Turbine Engine 1B Maximum Hourly Design Rate (MHDR) = 265.30 MMBtu/hr (NG) and 272.00 MMBtu/hr (No. 2 FO)	Pratt & Whitney FT-8 Aero	E02
EU0003	Combustion Turbine Engine 2A Maximum Hourly Design Rate (MHDR) = 265.30 MMBtu/hr (NG) and 272.00 MMBtu/hr (No. 2 FO)	Pratt & Whitney FT-8 Aero	E03
EU0004	Combustion Turbine Engine 2B Maximum Hourly Design Rate (MHDR) = 265.30 MMBtu/hr (NG) and 272.00 MMBtu/hr (No. 2 FO)	Pratt & Whitney FT-8 Aero	E04

PERMIT CONDITION (EU0001 through EU0004)-001
 10 CSR 10-6.060 Construction Permits Required
 Construction Permit 122000-008, Issued December 13, 2000
 Construction Permit 122000-008A, Issued May 17, 2005

Emission Limitations:

- 1) The permittee shall emit into the atmospheres from all turbine engines (EU0001 through EU0004) less than 100 tons of carbon monoxide (CO) in any consecutive twelve (12)-month period. [Special Condition 1.A]
- 2) The permittee shall emit into the atmospheres from all turbine engines (EU0001 through EU0004) less than 100 tons of nitrogen oxides (NOx) in any consecutive twelve (12)-month period. [Special Condition 1.B]

Operational Limitation:

All natural gas and/or fuel oil combusted in EU0001 through EU0004 shall have a sulfur content of 0.05% (or less) by weight. [Special Condition 4.A]

Stack Testing:

The permittee shall conduct stack tests every five (5) years on at least two (2) turbine engines to meet the requirement of Special Condition 5.A of Construction Permit 12200-008 and to verify that the NOx and CO emission limitations are not exceeded. These emission tests should develop

emission factors for CO and NO_x for a full range of loads on the turbines (i.e. at loads from 50% to 100%) so that an accurate estimate of total pollutant emissions from the installation during all modes of operation can be determined. The emission tests should also demonstrate compliance with Subpart GG, *Standards of Performance for Stationary Gas Turbines*. [Special Condition 5.G and 5.A]

Alternative Emissions Testing Method – Replacement of Special Condition 6 requiring CEMs:

- 1) Following the methodology described in 40 CFR Part 75 Appendix E, the McCartney Generating Station shall generate a NO_x-to-load curve through stack testing to demonstrate compliance with the NO_x emission limit and a CO-to-load curve to demonstrate compliance with the CO emission limit. The generated load curves shall represent the winter and the summer time at various load conditions. [Special Conditions 7A and B – Alternative Emissions Testing Method]
- 2) Beginning six (6) months after the initial performance testing, and semi-annually thereafter, the McCartney Generating Station shall conduct testing on each turbine to verify that the NO_x emission limitation is not exceeded. This testing may be conducted either in the same manner as the original performance test or using a portable test analyzer. The test protocol will be established through consultation with the Air Pollution Control Program's Enforcement Section and shall consist of tests run at the maximum and minimum rated operating capacities. In addition, re-certification by testing over the entire load range shall be performed in a manner and frequency stipulated in 40 CFR Part 75. Special Conditions 5B, 5C, 5D, 5E and 5F of Construction Permit 122000-008 will also apply to this on-going emission testing. [Special Condition 7.C]
- 3) Fuel-water ratio shall be optimized through stack testing at various load conditions set forth in Special Conditions 7.A and 7.B of Construction Permit 122000-008. The above condition (Special Condition 7.C) will also apply to this on-going emission testing. For the purposes of this paragraph, optimized shall mean that the water injection rate shall be adjusted so that NO_x and CO hourly emissions are approximately equal under high load conditions. [Special Condition 7.D]
- 4) The McCartney Generating Station will be exempt from winter season testing (defined as November 1st through February 28th) and from summer season testing (defined as March 1st through October 31st) if each of the four (4) turbine engines are not operated more than five (5) unit operating hours during the season. These operating hours shall be used exclusively for maintenance purposes. [Special Conditions 8.A and B]
- 5) In order to demonstrate that the turbines did not operate, the McCartney Generating Station shall maintain records of operation, which document the gross megawatt load (MW), date and length of time each turbine operates. [Special Condition 8.C]
- 6) If any of the four (4) turbine engines are operated more than five (5) unit operating hours each during the winter/summer season, then the McCartney Generating Station shall: [Special Condition 8.D]
 - a) Notify the Air Pollution Control Program's Enforcement Section within ten (10) days of operating greater than five (5) unit hours on each of the turbine engines for the particular winter/summer season;
 - b) Conduct performance testing on each turbine that has operated. The testing is to be coordinated with the Air Pollution Control Program's Enforcement Section and conducted during the winter/summer season in which the turbines are operated.

Monitoring/Recordkeeping:

- 1) The permittee shall maintain the monthly and the sum of the most recent consecutive 12-month records of CO emissions from EU0001 through EU0004. The permittee shall use Attachment A, Monthly CO Emissions Tracking Records, or an equivalent form to certify compliance with the emission limitation. [Special Condition 2.A]
- 2) The permittee shall maintain the monthly and the sum of the most recent consecutive 12-month records of NO_x emissions from EU0001 through EU0004. The permittee shall use Attachment B, Monthly NO_x Emissions Tracking Records, or an equivalent form to certify compliance with the emission limitation. [Special Condition 2.B]
- 3) These records shall be made available immediately for inspection to Department of Natural Resources' personnel upon request.
- 4) All records shall be maintained for five years.

Reporting:

- 1) Two (2) copies of a written report of the performance test results shall be submitted to the Director of the Air Pollution Control Program within 60 days of completion of any required testing. The report must include legible copies of the raw data sheets, analytical instrument laboratory data, and complete sample calculations from the required EPA Method for at least one (1) sample run. The test report is to fully account for all operational and emission parameters addressed both in the permit conditions as well as in any other applicable state or federal rules or regulations. [Special Conditions 5.E and 5.F]
- 2) The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the permittee determines that the emission unit(s) exceeded the emission limits. [Special Conditions 3.A and B]
- 3) Reports of any deviations from monitoring, recordkeeping and reporting requirements of this permit condition shall be submitted semi-annually, in the semi-annual monitoring report and annual compliance certification, as required by 10 CSR 10-6.065(6)(C)1.C.(III) and Section V of this permit.

PERMIT CONDITION (EU0001 through EU0004)-002

10 CSR 10-6.070, New Source Performance Regulations
40 CFR Part 60, Subpart GG Standards of Performance for Stationary Gas Turbines

Emission Limitations:

Nitrogen Oxides:

- 1) On and after the date on which the performance test required by §60.8 is completed, the permittee shall not cause to be discharged into the atmosphere from any stationary gas turbine (EU0001 through EU0004), any gases which contain nitrogen oxides in excess of 0.0107 percent (%) by volume at 15 percent oxygen and on a dry basis. [§60.332(a)(1)]
- 2) Stationary gas turbines using water or steam injection for control of NO_x emissions are exempt from the emission limitation when ice fog is deemed a traffic hazard by the owner or operator of the gas turbine. [§60.332(f)]

Sulfur Dioxide:

On and after the date on which the performance test required to be conducted by §60.8 is completed, the permittee shall comply with one or the other of the following conditions: [§60.333(a) or (b)]

- 1) No owner or operator subject to the provisions of this subpart shall cause to be discharged into the atmosphere from any stationary gas turbine any gases which contain sulfur dioxide in excess of 0.015 percent by volume at 15 percent oxygen and on a dry basis.
- 2) No owner or operator subject to the provisions of this subpart shall burn in any stationary gas turbine any fuel which contains total sulfur in excess of 0.8 percent by weight (8000 ppmw).

Monitoring/Recordkeeping:

Nitrogen Oxides:

- 1) The permittee shall install, calibrate, maintain and operate a continuous monitoring system to monitor and record the fuel consumption and the ratio of water or steam to fuel being fired in the turbines. [§60.334(a)]
- 2) The steam or water to fuel ratio shall be monitored during the performance test to establish acceptable values and ranges. The owner or operator may supplement the performance test data with engineering analyses, design specifications, manufacturer's recommendations and other relevant information to define the acceptable parametric ranges more precisely. The owner or operator shall develop and keep on-site a parameter monitoring plan that explains the procedures used to document proper operation of the NOx emission controls. The plan shall include the parameter(s) monitored and the acceptable range(s) as well as the basis for designating the parameter(s) and acceptable range(s). Any supplemental data and other information shall be included in the monitoring plan. For affected units that are subject to Part 75 and that use the low mass emissions methodology in §75.19 or the NOx emission measurement methodology in Appendix E to Part 75, the owner or operator may meet the requirements of this paragraph by developing and keeping on-site (or at a central location for unmanned facilities) a quality-assurance plan as described in §75.19(e)(5) or in Section 2.3 of Appendix E and Section 1.3.6 of Appendix B to Part 75. [§60.334(g)]
- 3) The permittee shall monitor the nitrogen content of the fuel combusted in the turbines, if the owner or operator claims an allowance for fuel bound nitrogen (i.e., if an F-value greater than zero is being used or will be used to calculate STD in §60.335(b)(9) or an approved alternative. If the permittee does not claim an allowance for fuel bound nitrogen, then monitoring the nitrogen content of the fuel is not required. [§60.334(h)(2)]

Sulfur Dioxide:

- 1) The permittee shall monitor the total sulfur content of the fuel being fired in the turbines, except as provided in paragraph (h)(3) of §60.334. The sulfur content of the fuel must be determined using total sulfur methods described in §60.335(b)(10). Alternatively, if the total sulfur content of the gaseous fuel during the most recent performance test was less than 0.4 weight percent (4000 ppmw), ASTM D4084-82, D5504-01, D6228-98, or Gas Processors Association Standard 2377-86 (all of which are incorporated by reference – see §60.17), which measure the major sulfur compounds may be used. [§60.334(h)(1)]
- 2) If the owner or operator is required under §60.334(i)(1) or (3) to periodically determine the sulfur content of the fuel combusted in the turbines, a minimum of three (3) fuel samples shall be collected during the performance test. Analyze the samples of the total sulfur content of the fuel being used. [§60.335(b)(10)(i) and (ii)]
 - a) For liquid fuels, ASTM D129-00, D2622-98, D4294-02, D1266-98, D5453-00 or D1552-01; or
 - b) For gaseous fuels, ASTM D1072-80, 90; D3246-81, 92, 96; D4468-85; or D6667-01. The applicable ranges of some ASTM methods mentioned above are not adequate to measure the levels of sulfur in some fuel gases. Dilution of samples before analysis (with verification of the dilution ratio) may be used, subject to the prior approval of the Administrator.

- 3) The frequency of determining the sulfur content of the fuel shall be as follows: [§60.334(i)(1) and (2)]
 - a) *Fuel oil.* For fuel oil, use of the total sulfur sampling options and the associated sampling frequency described in Section 2.2.3, 2.2.4.1, 2.2.4.2 and 2.2.4.3 of Appendix D to 40 CFR Part 75.
 - b) *Gaseous fuel.* For owners and operators that elect not to demonstrate sulfur content using options in paragraph (h)(3) of Section 60.334, and for which the fuel is supplied without intermediate bulk storage, the sulfur content value of the gaseous fuel shall be determined and recorded once per unit operating day.
- 4) The permittee may elect not to monitor the total sulfur content of the gaseous fuel combusted in the turbines, if the gaseous fuel is demonstrated to meet the definition of natural gas in §60.331(u). The owner or operator shall use one of the following sources of information to make the required demonstration:
 - a) The gas quality characteristics in a current, valid purchase contract, tariff sheet or transportation contract for the gaseous fuel, specifying the maximum total sulfur content of the fuel is 20.0 grains/100 scf or less; or
 - b) Representative fuel sampling data which shows that sulfur content of the gaseous fuel does not exceed 20 grains/100 scf. At minimum, the amount of fuel sampling data specified in Section 2.3.1.4 or 2.3.2.4 of Appendix D to Part 75 is required [60.334(h)(3)].

Reporting:

- 1) For each affected unit required to continuously monitor parameters or emissions, or to periodically determine the fuel sulfur content or fuel nitrogen content under this subpart, the owner or operator shall submit reports of excess emissions and monitoring downtime, in accordance with §60.7(c). Excess emissions shall be reported for all periods of unit operation, including startup, shutdown and malfunction. For the purpose of reports required under §60.7(c), periods of excess emissions and monitor downtime that shall be reported are defined as follows: [§60.334(j)(1)(i)]
 - a) An excess emission shall be any unit operating hour for which the average steam or water to fuel ratio, as measured by the continuous monitoring system, falls below the acceptable steam or water to fuel ratio needed to demonstrate compliance with §60.332, as established during the performance test required in §60.8. Any unit operating hour in which no water or steam is injected into the turbine shall also be considered an excess emission.
 - b) A period of monitor downtime shall be any unit operating hour in which water or steam is injected into the turbine, but the essential parametric data needed to determine the steam or water to fuel ratio are unavailable or invalid.
 - c) Each report shall include the average steam or water to fuel ratio, average fuel consumption, ambient conditions (temperature, pressure, and humidity), gas turbine load, and (if applicable) the nitrogen content of the fuel during each excess emissions. You do not have to report ambient conditions if you opt to use the worst case ISO correction factor as specified in §60.334(b)(3)(ii), or if you are not using the ISO correction equation under the provisions of §60.335(b)(1)
- 2) For each affected unit required to continuously monitor parameters or emissions, or to periodically determine the fuel sulfur content or fuel nitrogen content under this subpart, the owner or operator shall submit reports of excess emissions and monitor downtime, in accordance with §60.7(c). Excess emissions shall be reported for all periods of unit operation, including startup, shutdown and malfunction. For the purpose of reports required under §60.7(c), periods of excess emissions and

monitor downtime that shall be reported are as follows: sulfur dioxide, if the owner or operator is required to monitor the sulfur content of the fuel under §60.334(h) [§60.334(j)(2)(i) and (ii)]

- a) For samples of gaseous fuel and for oil samples obtained using daily sampling, flow proportional sampling, or sampling from the unit's storage tank, an excess emission occurs each unit operating hour included in the period beginning on the date and hour of any sample for which the sulfur content of the fuel being fired in the gas turbine exceeds 0.8 weight percent and ending on the date and hour that a subsequent sample is taken that demonstrates compliance with the sulfur limit.
 - b) If the option to sample each delivery of fuel oil has been selected, the owner or operator shall immediately switch to one of the other oil sampling options, if the sulfur content of a delivery exceeds 0.8 weight percent. The owner or operator shall continue to use one of the other sampling options until all of the oil from the delivery has been combusted, and shall evaluate excess emissions according to paragraph (j)(2)(i) of Section 60.334. When all of the fuel from the delivery has been burned, the owner or operator may resume using the as-delivered sampling option.
- 3) Each period during which an exemption provided in §60.332(f) is in effect shall be reported in writing to the Administrator quarterly. For each period the ambient conditions existing during the period, the date and time the air pollution control system was deactivated, and the date and time the air pollution control system was reactivated shall be reported. All quarterly reports shall be postmarked by the 30th day following the end of each calendar quarter. [§60.334(j)(3)]
 - 4) All reports required under §60.7(c) shall be postmarked by the 30th day following the end of each of six-month period. [§60.334(j)(5)]

PERMIT CONDITION (EU0001 through EU0004)-003

10 CSR 10-6.270 Acid Rain Source Permits Required

Emission Limitation:

The permittee shall obtain an Acid Rain Source Permit for EU0001 through EU0004 pursuant to Title IV of the Clean Air Act.

A Phase II permit (Missouri Department of Natural Resources project 2013-04-095, ORIS Code 7903) is being issued to the permittee in conjunction with this Title V permit. (See Attachment E) Sulfur dioxide (SO₂) limitations are referenced in this existing Title IV: Phase II Acid Rain Permit for the installation.

Monitoring/Recordkeeping:

The permittee shall retain the most current acid rain permit issued to this installation on-site and shall immediately make such permit available to any Department of Natural Resources' personnel upon request.

Reporting:

Annual Compliance Certification.

PERMIT CONDITION (EU0001 through EU0004)-004

10 CSR 10-6.360 Clean Air Interstate Rule Annual NO_x Trading Program
10 CSR 10-6.364 Clean Air Interstate Rule Seasonal NO_x Trading Program
10 CSR 10-6.366 Clean Air Interstate Rule SO_x Trading Program

Emission Limitation:

The permittee shall obtain a CAIR Source Permit for the combustion turbines (EU0001 through EU0004).

A CAIR Permit (Missouri Department of Natural Resources project 2013-04-096, ORIS Code 7903) is being issued to the permittee in conjunction with this Title V permit. (See Attachment F)

Monitoring/Recordkeeping:

The permittee shall retain the most current CAIR permit issued to this installation on-site and shall immediately make such permit available to any Missouri Department of Natural Resources' personnel upon request.

Reporting:

Annual Compliance Certification.

The permittee shall report any deviations of the monitoring/recordkeeping requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V of this permit.

IV. Core Permit Requirements

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

10 CSR 10-6.045 Open Burning Requirements

- 1) General Provisions. The open burning of tires, petroleum-based products, asbestos containing materials, and trade waste is prohibited, except as allowed below. Nothing in this rule may be construed as to allow open burning which causes or constitutes a public health hazard, nuisance, a hazard to vehicular or air traffic, nor which violates any other rule or statute.
- 2) Refer to the regulation for a complete list of allowances. The following is a listing of exceptions to the allowances:
 - a) Burning of household or domestic refuse. Burning of household or domestic refuse is limited to open burning on a residential premises having not more than four dwelling units, provided that the refuse originates on the same premises, with the following exceptions:
 - i) Kansas City metropolitan area. The open burning of household refuse must take place in an area zoned for agricultural purposes and outside that portion of the metropolitan area surrounded by the corporate limits of Kansas City and every contiguous municipality;
 - ii) Springfield-Greene County area. The open burning of household refuse must take place outside the corporate limits of Springfield and only within areas zoned A-1, Agricultural District;
 - iii) St. Joseph area. The open burning of household refuse must take place within an area zoned for agricultural purposes and outside that portion of the metropolitan area surrounded by the corporate limits of St. Joseph; and
 - iv) St. Louis metropolitan area. The open burning of household refuse is prohibited;
 - b) Yard waste, with the following exceptions:
 - i) Kansas City metropolitan area. The open burning of trees, tree leaves, brush or any other type of vegetation shall require an open burning permit;
 - ii) Springfield-Greene County area. The City of Springfield requires an open burning permit for the open burning of trees, brush or any other type of vegetation. The City of Springfield prohibits the open burning of tree leaves;
 - iii) St. Joseph area. Within the corporate limits of St. Joseph, the open burning of trees, tree leaves, brush or any other type of vegetation grown on a residential property is allowed during the following calendar periods and time-of-day restrictions:
 - (1) A three (3)-week period within the period commencing the first day of March through April 30 and continuing for twenty-one (21) consecutive calendar days;
 - (2) A three (3)-week period within the period commencing the first day of October through November 30 and continuing for twenty-one (21) consecutive calendar days;
 - (3) The burning shall take place only between the daytime hours of 10:00 a.m. and 3:30 p.m.; and
 - (4) In each instance, the twenty-one (21)-day burning period shall be determined by the director of Public Health and Welfare of the City of St. Joseph for the region in which the City of St. Joseph is located provided, however, the burning period first shall receive the approval of the department director; and

- iv) St. Louis metropolitan area. The open burning of trees, tree leaves, brush or any other type of vegetation is limited to the period beginning September 16 and ending April 14 of each calendar year and limited to a total base area not to exceed sixteen (16) square feet. Any open burning shall be conducted only between the hours of 10:00 a.m. and 4:00 p.m. and is limited to areas outside of incorporated municipalities;
- 3) Certain types of materials may be open burned provided an open burning permit is obtained from the director. The permit will specify the conditions and provisions of all open burning. The permit may be revoked if the owner or operator fails to comply with the conditions or any provisions of the permit.
- 4) McCartney Generating Station may be issued an annually renewable open burning permit for open burning provided that an air curtain destructor or incinerator is utilized and only tree trunks, tree limbs, vegetation or untreated wood waste are burned. Open burning shall occur at least two hundred (200) yards from the nearest occupied structure unless the owner or operator of the occupied structure provides a written waiver of this requirement. Any waiver shall accompany the open burning permit application. The permit may be revoked if McCartney Generating Station fails to comply with the provisions or any condition of the open burning permit.
- a) In a nonattainment area, as defined in 10 CSR 10-6.020, paragraph (2)(N)5., the director shall not issue a permit under this section unless the owner or operator can demonstrate to the satisfaction of the director that the emissions from the open burning of the specified material would be less than the emissions from any other waste management or disposal method.
- 5) Reporting and Recordkeeping. New Source Performance Standard (NSPS) 40 CFR Part 60 Subpart CCCC establishes certain requirements for air curtain destructors or incinerators that burn wood trade waste. These requirements are established in 40 CFR 60.2245-60.2260. The provisions of 40 CFR Part 60 Subpart CCCC promulgated as of September 22, 2005, shall apply and are hereby incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401. To comply with NSPS 40 CFR 60.2245-60.2260, sources must conduct an annual Method 9 test. A copy of the annual Method 9 test results shall be submitted to the director.
- 6) Test Methods. The visible emissions from air pollution sources shall be evaluated as specified by 40 CFR Part 60, Appendix A–Test Methods, Method 9–Visual Determination of the Opacity of Emissions from Stationary Sources. The provisions of 40 CFR Part 60, Appendix A, Method 9 promulgated as of December 23, 1971, is incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401.

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 10-6.110 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.

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 recordkeeping 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 Recordkeeping and Reporting Requirements

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

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

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

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

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

This permit prohibits emissions which exceed any allowances the installation holds under Title IV of the Clean Air Act.

No permit revisions shall be required for increases in emissions that are authorized by allowances acquired pursuant to the acid rain program if the increases do not require a permit revision under any other applicable requirement.

Limits cannot be placed on the number of allowances that may be held by an installation. The installation may not use these allowances, however, as a defense for noncompliance with any other applicable requirement.

Any allowances held by a Title IV installation shall be accounted for according to procedures established in rules promulgated under Title IV of the Clean Air Act.

This facility is being issued a renewal of the acid rain permit (project no. 2013-04-095) along with this operating permit.

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 semi-annually (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's 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's 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), recordkeeping, 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's 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 Air Pollution Control Program shall place a copy with the permit in the public file. Written notice shall be provided to the EPA and the Air Pollution Control Program 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 Air Pollution Control Program 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 written notice of the change to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, no later than the next annual emissions report. This notice shall not be required for changes that are insignificant activities under 10 CSR 10-6.065(6)(B)3. 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 Dave Fraley, Director - Environmental Affairs. 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) The Missouri Department of Natural Resources or EPA determines that the permit contains a material mistake or that inaccurate statements were made which resulted in establishing the emissions limitation standards or other terms of the permit,
- 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) The Missouri Department of Natural Resources or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

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

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

VI. Attachments

Attachments follow.

Attachment A

MONTHLY CO EMISSIONS TRACKING RECORD

FACILITY TOTALS																		
	Column 1	Column 2	Column 3A	Column 3B	Column 1	Column 2	Column 3A	Column 3B	Column 1	Column 2	Column 3A	Column 3B	Column 1	Column 2	Column 3A	Column 3B	Column 4	Column 5
	EU0001 (MGS1A)				EU0002 (MGS1B)				EU0003 (MGS2A)				EU0004 (MGS2B)					
Date	Monthly Hours of Operation	Tested Load Level	CO Emission Rate	Unit Monthly CO Emissions	Monthly Hours of Operation	Tested Load Level	CO Emission Rate	Unit Monthly CO Emissions	Monthly Hours of Operation	Tested Load Level	CO Emission Rate	Unit Monthly CO Emissions	Monthly Hours of Operation	Tested Load Level	CO Emission Rate	Unit Monthly CO Emissions	Total Monthly CO Emissions	12-month CO Emissions
Month/Year	(Hours)	(MW)	(lb/hr)	(tons)	(tons)	(tons/year)												
January																		
February																		
March																		
Quarter 1																		
April																		
May																		
June																		
Quarter 2																		
July																		
August																		
September																		
Quarter 3																		
October																		
November																		
December																		
Quarter 4																		
Yearly QA																		

¹APCP shall approve the results of the stack test for this value.

²Column 3B = Column 1 x Column 3A x 0.0005

³Column 4 = Sum of all Column 3Bs

⁴Column 5 = Sum of last 12-months of Column 4s. NOTE: 12-month total CO emission less than 100 tons indicates compliance.

Attachment B
MONTHLY NO_x EMISSIONS TRACKING RECORD

FACILITY TOTALS																		
	Column 1	Column 2	Column 3A	Column 3B	Column 1	Column 2	Column 3A	Column 3B	Column 1	Column 2	Column 3A	Column 3B	Column 1	Column 2	Column 3A	Column 3B	Column 4	Column 5
	EU0001 (MGS1A)				EU0002 (MGS1B)				EU0003 (MGS2A)				EU0004 (MGS2B)					
Date	Monthly Hours of Operation	Tested Load Level	NO _x Emission Rate	Unit Monthly NO _x Emissions	Monthly Hours of Operation	Tested Load Level	NO _x Emission Rate	Unit Monthly NO _x Emissions	Monthly Hours of Operation	Tested Load Level	NO _x Emission Rate	Unit Monthly NO _x Emissions	Monthly Hours of Operation	Tested Load Level	NO _x Emission Rate	Unit Monthly NO _x Emissions	Total Monthly NO _x Emissions	12-month NO _x Emissions
Month/Year	(Hours)	(MW)	(lb/hr)	(tons)	(tons)	(tons/year)												
January																		
February																		
March																		
Quarter 1																		
April																		
May																		
June																		
Quarter 2																		
July																		
August																		
September																		
Quarter 3																		
October																		
November																		
December																		
Quarter 4																		
Yearly QA																		

¹APCP shall approve the results of the stack test for this value.
²Column 3B = Column 1 x Column 3A x 0.0005
³Column 4 = Sum of all Column 3Bs
⁴Column 5 = Sum of last 12-months of Column 4s. NOTE: 12-month total NO_x emission less than 100 tons indicates compliance.

Attachment C

Attachment C

EXCESS EMISSIONS NOTIFICATION FORM

CONTINUOUS EMISSIONS MONITORING EXCEEDANCE REPORT
 Pursuant to 10 CSR 10-6.050, *Startup, Shutdown and Malfunction* and
 40 CFR 60.7(c)(2), *Notification and Record Keeping* - FAX: 573-751-2706

Report Date:	
Source Name:	McCartney Generating Station FIPS/Plant No.: 077-0164
Source Address:	5701 East Farm Road 112, Stafford, MO
Emission Point:	Pollutant(s) Monitored (limit):
Responsible Person:	Phone No.:
Discovered by:	

Date(s) of Excess Emissions								
Date of Discovery								
Total Source Operation Time (minutes)								
Reason for Excess Emissions	Code	Min.	Code	Min.	Code	Min.	Code	Min.
Startup/Shutdown								
Control Equipment Problems								
Process Problems								
Other Known Excess Emissions								
Unknown Excess Emissions								
Fuel Problems								
Cleaning; Soot-Blowing								
Percent Operating Time Above Standard								

Date(s)	Code	Description of Event	Corrective Action Measures

Date(s) of Monitor Downtime								
Date of Discovery								
Total Source Operation Time (minutes)								
Reason for Monitor Downtime	Code	Min.	Code	Min.	Code	Min.	Code	Min.
CEM Equipment Malfunction								
Non-CEM Equipment Malfunction								
Calibration (QA/QC)								
Other Known CEM Downtime								
Unknown CEM Downtime								
Percent Operating Time Above Standard								

Date(s)	Code	Description of Event	Corrective Action Measures

(Signature) _____

Attachment D

**Attachment D
 McCartney Generating Station**

Date: _____

**CONTINUOUS EMISSION MONITOR QUARTERLY REPORT
 Combustion Turbine Exceedance/Downtime Summary**

Source Name: City Utilities of Springfield – McCartney Generating Station
 CDS CNTY & SOURCE #: 26 077 00164
 Reporting Quarter: _____
 Due Date of Report: _____
 Reporting Under: NSPS provisions 40 CFR 60.7(c)

	Total duration (hours)			
	MGS1A E01	MGS1B E02	MGS2A E03	MGS2B E04
Turbine #:				
Emission Point:				
Emission Unit:	EU0001	EU0002	EU0003	EU0004
Pollutant Monitored (Limit):	NOx (100 tons)	NOx (100 tons)	NOx (100 tons)	NOx (100 tons)

Total Source Operation per Emission Point:

REASON FOR EXCESS EMISSIONS

- Startup/Shutdown (5/8)
- Control Equipment Problems (1)
- Process Problem (3)
- Other Known Causes (Excess Emission) (7)
- Unknown Cause (4)
- Fuel Problem (2)
- Cleaning/Soot Blowing (6)
- Percent Operating Time Above Standard
- Comments on Types of Problems:

Total Duration:	hours			

REASON FOR CEMS DOWNTIME

- Monitor Equipment Malfunction (01)
- Non-monitor Equipment Malfunction (02)
- Quality Assurance (03)
- Other Known Cause (Monitor Malfunction) (04)
- Unknown Cause (Monitor Malfunction) (05)
- Percent Operating Monitor Downtime
- Comments on Monitor Problems:

Total Duration:	hours			

Reported by: _____
 Position Title: _____
 Phone: _____

**CONTINUOUS EMISSIONS MONITORING QUARTERLY REPORT
NO. 1 MONITORING SYSTEM DOWNTIME**

City Utilities of Springfield, Missouri
SOURCE: McCartney Generating Station
SOURCE OF EMISSIONS: Engine 1A, 1B, 2A or 2B
QUARTER _____ YEAR _____

DATE TIME DURATION REASON CODE Comment(s)

Combustion Turbine Engine No. 1A

Combustion Turbine Engine No. 1B

Combustion Turbine Engine No. 2A

Combustion Turbine Engine No. 2B

TOTAL DOWNTIME

Submitted by: _____

Position Title: _____

SUPPLEMENTAL EXCESS EMISSIONS DATA
 MCCARTNEY GENERATING STATION
 COMBUSTION TURBINES

DATE	HOUR ENDING	HOURLY AVERAGE WATER: FUEL RATIO	HOURLY AVERAGE WATER: FUEL REQUIRED RATIO	HOURLY AVERAGE FUEL CONSUMPTION	UNIT LOAD	AMBIENT TEMP (°F)	NOTES

ENGINE 1A

ENGINE 1B

ENGINE 2A

ENGINE 2B

Reported by: _____

Attachment E

TITLE IV: ACID RAIN PERMIT

In accordance with Titles IV and V of the Clean Air Act and Missouri State Rule 10 CSR 10-6.270, *Acid Rain Source Permits Required*, the State of Missouri issues this Acid Rain Permit.

Installation Name: City Utilities McCartney Generating Station
ORIS Code: 7903
Project Number: 2013-04-095
Unit ID: MGS1A, MGS1B, MGS2A and MGS2B

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

The number of allowances actually held by an affected source in a unit account may differ from the number allocated by the United States Environmental Protection Agency. Pursuant to 40 CFR 72.84, *Automatic permit amendment*, this does not necessitate a revision to any unit SO₂ allowance allocations identified in this permit.

These units have never burned coal, and are therefore not subject to the Nitrogen Oxides Emissions Reduction Program of the Acid Rain Program.

This Acid Rain permit is being issued in conjunction with this operating permit and is effective for the same period of time as the operating permit. The permittee shall submit an application to renew this Acid Rain permit in conjunction with the operating permit renewal application.

Date

Director or Designee,
Department of Natural Resources

McCartney Generating Station
Facility (Source) Name (from STEP 1)

Acid Rain - Page 2

Permit Requirements

STEP 3

Read the standard requirements.

- (1) The designated representative of each affected source and each affected unit at the source shall:
 - (i) Submit a complete Acid Rain permit application (including a compliance plan) under 40 CFR part 72 in accordance with the deadlines specified in 40 CFR 72.30; and
 - (ii) Submit in a timely manner any supplemental information that the permitting authority determines is necessary in order to review an Acid Rain permit application and issue or deny an Acid Rain permit;
- (2) The owners and operators of each affected source and each affected unit at the source shall:
 - (i) Operate the unit in compliance with a complete Acid Rain permit application or a superseding Acid Rain permit issued by the permitting authority; and
 - (ii) Have an Acid Rain Permit.

Monitoring Requirements

- (1) The owners and operators and, to the extent applicable, designated representative of each affected source and each affected unit at the source shall comply with the monitoring requirements as provided in 40 CFR part 75.
- (2) The emissions measurements recorded and reported in accordance with 40 CFR part 75 shall be used to determine compliance by the source or unit, as appropriate, with the Acid Rain emissions limitations and emissions reduction requirements for sulfur dioxide and nitrogen oxides under the Acid Rain Program.
- (3) The requirements of 40 CFR part 75 shall not affect the responsibility of the owners and operators to monitor emissions of other pollutants or other emissions characteristics at the unit under other applicable requirements of the Act and other provisions of the operating permit for the source.

Sulfur Dioxide Requirements

- (1) The owners and operators of each source and each affected unit at the source shall:
 - (i) Hold allowances, as of the allowance transfer deadline, in the source's compliance account (after deductions under 40 CFR 73.34(c)), not less than the total annual emissions of sulfur dioxide for the previous calendar year from the affected units at the source; and
 - (ii) Comply with the applicable Acid Rain emissions limitations for sulfur dioxide.
- (2) Each ton of sulfur dioxide emitted in excess of the Acid Rain emissions limitations for sulfur dioxide shall constitute a separate violation of the Act.
- (3) An affected unit shall be subject to the requirements under paragraph (1) of the sulfur dioxide requirements as follows:
 - (i) Starting January 1, 2000, an affected unit under 40 CFR 72.6(a)(2); or
 - (ii) Starting on the later of January 1, 2000 or the deadline for monitor certification under 40 CFR part 75, an affected unit under 40 CFR 72.6(a)(3).

McCartney Generating Station
Facility (Source) Name (from STEP 1)

Acid Rain - Page 3

Sulfur Dioxide Requirements, Cont'd.

STEP 3, Cont'd.

- (4) Allowances shall be held in, deducted from, or transferred among Allowance Tracking System accounts in accordance with the Acid Rain Program.
- (5) An allowance shall not be deducted in order to comply with the requirements under paragraph (1) of the sulfur dioxide requirements prior to the calendar year for which the allowance was allocated.
- (6) An allowance allocated by the Administrator under the Acid Rain Program is a limited authorization to emit sulfur dioxide in accordance with the Acid Rain Program. No provision of the Acid Rain Program, the Acid Rain permit application, the Acid Rain permit, or an exemption under 40 CFR 72.7 or 72.8 and no provision of law shall be construed to limit the authority of the United States to terminate or limit such authorization.
- (7) An allowance allocated by the Administrator under the Acid Rain Program does not constitute a property right.

Nitrogen Oxides Requirements

The owners and operators of the source and each affected unit at the source shall comply with the applicable Acid Rain emissions limitation for nitrogen oxides.

Excess Emissions Requirements

- (1) The designated representative of an affected source that has excess emissions in any calendar year shall submit a proposed offset plan, as required under 40 CFR part 77.
- (2) The owners and operators of an affected source that has excess emissions in any calendar year shall:
- (i) Pay without demand the penalty required, and pay upon demand the interest on that penalty, as required by 40 CFR part 77; and
 - (ii) Comply with the terms of an approved offset plan, as required by 40 CFR part 77.

Recordkeeping and Reporting Requirements

- (1) Unless otherwise provided, the owners and operators of the source and each affected unit at the source shall keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This period may be extended for cause, at any time prior to the end of 5 years, in writing by the Administrator or permitting authority:
- (i) The certificate of representation for the designated representative for the source and each affected unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation, in accordance with 40 CFR 72.24; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such documents are superseded because of the submission of a new certificate of representation changing the designated representative;

McCartney Generating Station
Facility (Source) Name (from STEP 1)

Acid Rain - Page 4

Recordkeeping and Reporting Requirements, Cont'd.

STEP 3, Cont'd.

- (ii) All emissions monitoring information, in accordance with 40 CFR part 75, provided that to the extent that 40 CFR part 75 provides for a 3-year period for recordkeeping, the 3-year period shall apply.
 - (iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under the Acid Rain Program; and,
 - (iv) Copies of all documents used to complete an Acid Rain permit application and any other submission under the Acid Rain Program or to demonstrate compliance with the requirements of the Acid Rain Program.
- (2) The designated representative of an affected source and each affected unit at the source shall submit the reports and compliance certifications required under the Acid Rain Program, including those under 40 CFR part 72 subpart I and 40 CFR part 75.

Liability

- (1) Any person who knowingly violates any requirement or prohibition of the Acid Rain Program, a complete Acid Rain permit application, an Acid Rain permit, or an exemption under 40 CFR 72.7 or 72.8, including any requirement for the payment of any penalty owed to the United States, shall be subject to enforcement pursuant to section 113(c) of the Act.
- (2) Any person who knowingly makes a false, material statement in any record, submission, or report under the Acid Rain Program shall be subject to criminal enforcement pursuant to section 113(c) of the Act and 18 U.S.C. 1001.
- (3) No permit revision shall excuse any violation of the requirements of the Acid Rain Program that occurs prior to the date that the revision takes effect.
- (4) Each affected source and each affected unit shall meet the requirements of the Acid Rain Program.
- (5) Any provision of the Acid Rain Program that applies to an affected source (including a provision applicable to the designated representative of an affected source) shall also apply to the owners and operators of such source and of the affected units at the source.
- (6) Any provision of the Acid Rain Program that applies to an affected unit (including a provision applicable to the designated representative of an affected unit) shall also apply to the owners and operators of such unit.
- (7) Each violation of a provision of 40 CFR parts 72, 73, 74, 75, 76, 77, and 78 by an affected source or affected unit, or by an owner or operator or designated representative of such source or unit, shall be a separate violation of the Act.

Effect on Other Authorities

No provision of the Acid Rain Program, an Acid Rain permit application, an Acid Rain permit, or an exemption under 40 CFR 72.7 or 72.8 shall be construed as:

- (1) Except as expressly provided in title IV of the Act, exempting or excluding the owners and operators and, to the extent applicable, the designated representative of an affected source or affected unit from compliance with any other provision of the Act, including the provisions of title I of the Act relating

McCartney Generating Station
Facility (Source) Name (from STEP 1)

Acid Rain - Page 5

Effect on Other Authorities, Cont'd.

STEP 3, Cont'd.

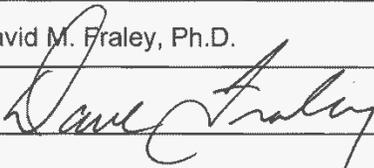
to applicable National Ambient Air Quality Standards or State Implementation Plans;

- (2) Limiting the number of allowances a source can hold; *provided*, that the number of allowances held by the source shall not affect the source's obligation to comply with any other provisions of the Act;
- (3) Requiring a change of any kind in any State law regulating electric utility rates and charges, affecting any State law regarding such State regulation, or limiting such State regulation, including any prudence review requirements under such State law;
- (4) Modifying the Federal Power Act or affecting the authority of the Federal Energy Regulatory Commission under the Federal Power Act; or,
- (5) Interfering with or impairing any program for competitive bidding for power supply in a State in which such program is established.

Certification

STEP 4
Read the certification statement, sign, and date.

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

Name	David M. Fraley, Ph.D.	
Signature		Date 06.22.11

Attachment F

TITLE V: CLEAN AIR INTERSTATE RULE (CAIR) PERMIT

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

Installation Name: City Utilities – McCartney Generating Station, **ORIS Code:** 7903
Project Number: 2013-04-096
Unit IDs: MGS1A, MGS1B, MGS2A, MGS2B

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

This CAIR Permit applies only to units MGS1A, MGS1B, MGS2A and MGS2B at City Utilities – McCartney Generating Station (Facility ID 077-0164).

This CAIR permit is being issued in conjunction with this operating permit and is effective for the same period of time as the operating permit. The permittee shall submit an application to renew this CAIR permit in conjunction with the operating permit renewal application.

Date

Director or Designee,
Department of Natural Resources

CAIR Permit Application

(for sources covered under a CAIR SIP)

2013-04-04

Page 1

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

This submission is: New Revised

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

Plant Name	McCartney Generating Station	State	MO	ORIS/Facility Code	7903
------------	------------------------------	-------	----	--------------------	------

STEP 2
 Enter the unit ID# for each CAIR unit and indicate to which CAIR programs each unit is subject (by placing an "X" in the column)

Unit ID#	NO _x Annual	SO ₂	NO _x Ozone Season
MGS1A	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
MGS1B	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
MGS2A	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
MGS2B	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

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

Standard Requirements

(a) Permit Requirements.
 (1) The CAIR designated representative of each CAIR NO_x source, CAIR SO₂ source, and CAIR NO_x Ozone Season source (as applicable) required to have a title V operating permit and each CAIR NO_x unit, CAIR SO₂ unit, and CAIR NO_x Ozone Season unit (as applicable) required to have a title V operating permit at the source shall:
 (i) Submit to the permitting authority a complete CAIR permit application under §96.122, §96.222, and §96.322 (as applicable) in accordance with the deadlines specified in §96.121, §96.221, and §96.321 (as applicable); and
 (ii) Submit in a timely manner any supplemental information that the permitting authority determines is necessary in order to review a CAIR permit application and issue or deny a CAIR permit.
 (2) The owners and operators of each CAIR NO_x source, CAIR SO₂ source, and CAIR NO_x Ozone Season source (as applicable) required to have a title V operating permit and each CAIR NO_x unit, CAIR SO₂ unit, and CAIR NO_x Ozone Season unit (as applicable) required to have a title V operating permit at the source shall have a CAIR permit issued by the permitting authority under subpart CC, CCC, and CCCC (as applicable) of 40 CFR part 96 for the source and operate the source and the unit in compliance with such CAIR permit.
 (3) Except as provided in subpart II, III, and IIII (as applicable) of 40 CFR part 96, the owners and operators of a CAIR NO_x source, CAIR SO₂ source, and CAIR NO_x Ozone Season source (as applicable) that is not otherwise required to have a title V operating permit and each CAIR NO_x unit, CAIR SO₂ unit, and CAIR NO_x Ozone Season unit (as applicable) that is not otherwise required to have a title V operating permit are not required to submit a CAIR permit application, and to have a CAIR permit, under subpart CC, CCC, and CCCC (as applicable) of 40 CFR part 96 for such CAIR NO_x source, CAIR SO₂ source, and CAIR NO_x Ozone Season source (as applicable) and such CAIR NO_x unit, CAIR SO₂ unit, and CAIR NO_x Ozone Season unit (as applicable).

McCartney Generating Station
Plant Name (from Step 1)

CAIR Permit Application
Page 2

STEP 3,
continued

(b) Monitoring, reporting, and recordkeeping requirements.

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

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

(c) Nitrogen oxides emissions requirements.

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

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

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

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

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

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

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

Sulfur dioxide emission requirements.

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

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

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

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

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

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

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

Nitrogen oxides ozone season emissions requirements.

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

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

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

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

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

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

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

McCartney Generating Station
Plant Name (from Step 1)

CAIR Permit Application
Page 3

STEP 3,
continued

(d) Excess emissions requirements.

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

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

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

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

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

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

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

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

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

(e) Recordkeeping and Reporting Requirements.

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

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

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

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

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

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

(f) Liability.

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

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

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

McCartney Generating Station Plant Name (from Step 1)
--

CAIR Permit Application
Page 4

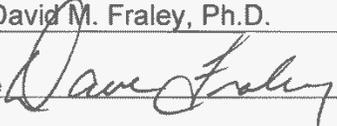
STEP 3,
continued

(g) Effect on Other Authorities.

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

Certification

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

Name David M. Fraley, Ph.D.	
Signature 	Date 06.22.11

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 June 27, 2011; revised date;
- 2) 2011 Emissions Inventory Questionnaire, received April 27, 2012; 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 122000-008, Issued December 13, 2000;
- 5) Construction Permit Amendment 122000-008A Issued May 17, 2005
- 6) Acid Rain Permit application, project 2013-04-095; and
- 7) CAIR Permit application, project 2013-04-096.

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

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

None.

Other Air Regulations Determined Not to Apply to the Operating Permit

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

10 CSR 10-6.350, *Emission Limitations and Emissions Trading of Oxides of Nitrogen*

This regulation no longer applies to the combustion turbines (EU0001 through EU0004) because they are subject to CAIR regulations.

Construction Permit Revisions

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

Construction Permit 122000-008 lists 10 CSR 10-6.220, *Restriction of Emission of Visible Air Contaminants* as an applicable regulation. However this rule does not apply to internal combustion engines that are operated outside the Kansas City or St. Louis metropolitan areas, therefore it was not included in the operating permit.

Construction Permit 122000-008 and 122000-008A include special conditions that require performance testing of the combustion turbines to develop emission factors for PM10, formaldehyde, CO and NOx. This initial testing and emission factor development has been completed. The construction permit also requires that two of the turbines be retested every five years to verify compliance with the NOx and CO emission limits. This condition (Special Condition 5G) was included in the operating permit. Special Condition 6 of the construction permit requires that CEMS be installed and operated "according to the guidelines in 40 CFR Part 75 for CO, NOx and diluent CEMS requirement." However, the permittee

may elect to replace this condition with Special Condition 7. Special Condition 7 requires that the permittee generate a NO_x-to-load curve through stack testing to demonstrate compliance with the NO_x limit, generate a CO-to-load curve through stack testing to demonstrate compliance with the CO limit and perform semi-annual testing on each turbine to verify that the NO_x and CO emission limits are not exceeded. A CEMS was installed per Appendix D and E of Part 75, however NO_x and CO analyzers or diluent systems are not installed at this time so the permittee has elected to comply with Special Condition 7. Therefore, Permit Condition (EU0010 through EU0040)-001 does not include Special Condition 6, but does include Special Conditions 7 and 8 of Construction Permit 122000-008A.

Construction Permit 122000-008 authorized the construction of eight (8) simple-cycle turbine engines and two (2) fuel storage tanks estimated at 1,000,000 gallons each. Four of the turbines and the fuel tanks were never installed therefore they were not included in the operating permit. If the permittee wishes to install this equipment in the future it must apply for and receive a new construction permit. Throughout this operating permit the reference to the eight (8) turbines authorized for construction by this construction permit has been changed to “four (4) turbines.”

New Source Performance Standards (NSPS) Applicability

40 CFR Part 60 Subpart GG, *Standards of Performance for Stationary Gas Turbines*

This regulation applies to combustion turbines (EU0001 through EU0004) at this facility. The applicable requirements of this regulation are included in the operating permit under Permit Condition (EU0001 through EU0004)-002.

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.*

This regulation does not apply to the fuel oil storage tanks permitted by Construction Permit 122000-008 and 122000-008A because they were never installed, it does not apply to the remaining fuel oil storage tanks on site because they do not store a liquid with a maximum true vapor pressure less than 15.0 kPa.

Maximum Achievable Control Technology (MACT) Applicability

40 CFR Part 63 Subpart YYYY, *National Emission Standards for Hazardous Air Pollutants for Stationary Combustion Turbines*

This regulation does not apply to the combustion turbines (EU0001 through EU0004) at this facility because it is not a major source of Hazardous Air Pollutant emissions.

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

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

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

Compliance Assurance Monitoring (CAM) Applicability

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. McCartney Generating Station’s Construction Permit 122000-008A has a federally enforceable condition that limits emissions of NOx and CO to less than the major source threshold (100 tons per any 12-month rolling period).

Greenhouse Gas Emissions

This installation is a major source for greenhouse gases. Major stationary sources are required by the Clean Air Act (CAA) to obtain Part 70 operating permits. While Part 70 permits generally do not establish new emissions limits, they consolidate applicable requirements, as defined in Missouri State Regulations 10 CSR 10-6.020(2)(A)23, into a comprehensive air permit. At the time of permit issuance, there were no applicable GHG requirements for this source.

Note that this source is subject to the Greenhouse Gas Reporting Rule. However, the preamble of the GHG Reporting Rule clarifies that Part 98 requirements do not have to be incorporated in Part 70 permits operating permits at this time. In addition, Missouri regulations do not require the installation to report CO₂ emissions in their Missouri Emissions Inventory Questionnaire; therefore, the installation’s CO₂ emissions were not included within this permit. An estimate of CO₂ emissions are included in the statement of basis. The applicant is required to report the data directly to EPA. The public may obtain CO₂ emissions data for this installation by visiting EPA’s Clean Air Markets website at: <http://camddataandmaps.epa.gov/gdm/index.cfm>.

Updated Potential to Emit for the Installation

Pollutant	Potential to Emit (tons/yr) ¹
CO	100.00
CO ₂ e	103,124
HAP	0.66
NO _x	100.00
PM ₁₀	3.40
PM _{2.5}	3.40
SO _x	0.53
VOC	3.14

The potential to emit for this facility is limited by the 100 tpy CO and NOx limits imposed by Construction Permit 122000-008 and 122000-008A. These limits are included in this operating permit under Permit Condition (EU0001 through EU0008)-001. It was determined that EU0002 could operate at maximum design rate for 6575 hours and be just under the 100 ton per year NOx limit. Therefore the potential to emit for all pollutants other than NOx and CO (which is 100tpy) was calculated assuming the worst case – using the MHDR from EU0002 and assuming this unit operated 6575 hours.

Other Regulatory Determinations

None.

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

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

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

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

Prepared by:

Jill Wade, P.E.
Environmental Engineer

Dr. Dave Fraley
McCartney Generating Station
P.O. Box 551
Springfield, MO 65801

Re: McCartney Generating Station, 077-0164
Permit Number: **OP2013-052**

Dear Dr. Fraley:

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.

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 do not hesitate to contact Jill Wade at Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102, or by telephone at (573) 751-4817. Thank you for your time and attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

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

MJS:jwk

Enclosures

c: Southwest Regional Office
PAMS File: 2011-06-072

MEMORANDUM

DATE: July 30, 2013

TO: Daniel Hedrick and Dave Fraley – City Utilities of Springfield

FROM: Jill Wade, Environmental Engineer

SUBJECT: Response to Public Comments

Comments were received from Daniel Hedrick, Manager Environmental Compliance - City Utilities and Mark Smith, Air Permitting and Compliance Branch Chief - EPA Region 7. The comments are addressed in the order in which they appear within the letter(s).

Comments from Daniel Hedrick:

Comment #1 and #2: Permit Condition (EU0001 through EU0008)-002 should be corrected to include only units built and not the units originally permitted.

Response to Comment: This condition has been changed to (EU0001 through EU0004)-002. The references to emission units EU0005 through EU0008 have been removed from the permit condition.

Comment #3: Permit Condition (EU0001 through EU0008)-002, Monitoring/Recordkeeping provisions Sulfur Dioxide paragraph 2 – The correct reference should be §60.335(b)(10)(i) and (ii).

Response to Comment: The reference to the applicable paragraph of 40 CFR Part 60 Subpart GG has been corrected to §60.335(b)(10)(i) and (ii) as requested.

Comment #4: Permit Condition (EU0001 through EU0008)-002, Reporting provisions paragraph 1) c) – Correct reference: “...You do not have to report ambient conditions if you opt to use the worst case ISO correction factor as specified in §60.334(b)(3)(ii)...”

Response to Comment: This statement has been corrected.

Comment #5: Permit Condition (EU0001 through EU0008)-002, Reporting provisions paragraph 3) – Correct reference to subpart should be §60.334(j)(3).

Response to Comment: This statement has been corrected.

Comment #6: Permit Condition (EU0001 through EU0008)-002, Reporting provisions paragraph 4) – Correct reference to subpart should be §60.334(j)(5).

Response to Comment: The reference to subpart GG for this paragraph already states §60.334(j)(5), therefore no change was made.

Comment #7: Remove the heading “Emission Limitation” from the Core Permit Condition, 10 CSR 10-6.170. Incorporation of the section heading is inconsistent with the Core Permit Requirements.

Response to Comment: The Emission Limitation section of 10 CSR 10-6.170 includes limitations on the emission of fugitive particulate matter beyond the property boundary. It is not believed that this language is inconsistent with the regulation’s intent. Furthermore it is included in all Intermediate and Part 70 operating permits issued by the Air Program, therefore no changes were made to this permit condition.

Comment #8: Please incorporate the attached revised Attachments A and B in to the operating permit for CO and NOx. Proposed Attachment C provides notification of Startup, Shutdown, and Malfunction events pursuant to 10 CSR 10-6.050. Proposed Attachment D provides quarterly/semi-annual report documentation for exceednce and monitor downtime periods. Change existing Attachments C and D to Attachment E and F.

Response to Comment: The prosed record keeping attachments have been included in the operating permit as Attachments A, B, C and D as requested. The Acid Rain permit is now included as Attachment E and the CAIR permit is Attachment F.

Comments #9, #11 and #12: Correct all references to Emission Units (EU0001 through EU0008) to (EU0001 through EU0004) in the statement of basis.

Response to Comment: These corrections have been made.

Comment #10: On page SB-1- Correct the typo: “If the permittee wishes to install this equipment in the future it must apply for **an** receive a new construction permit.”

Response to Comment: The “an” has been corrected to “and”.

Comments from Mark Smith:

Comment #1: The installation description on the cover sheet is confusing as to the number of emission units associated with the McCartney Generating Station. It is unclear whether there are two or four turbines. EPA recommends MDNR modify the installation descriptions to clarify the fact that there are four combustion turbines.

Response to Comment: The installation description has been clarified to state that there are four natural gas/fuel oil turbines.

Comment #2: Permit Condition (EU0001 through EU0008)-002 indicates that there are eight emission units, yet the listing of emission units with limitations indicates there are only four. Therefore, EPA recommends MDNR modify Permit Condition EU0001 through EU0008)-002 to (EU0001 through EU0004)-002; both in the title block and throughout the permit condition. Additionally NSPS Applicability portion of the Statement of Basis for Subpart GG shows applicability to EU0001 through EU0008, and EPA believes this should also be modified to shoe EU0001 through EU0004. Also, Attachment A and Attachment B indicate that they are

tracking records for eight turbine engines. EPA recommends MDNR modify these sheets to reflect actual conditions at McCartney Generating Station.

Response to Comment: See responses to comments #1, #2, #8, #9, #11 and #12 above.

Comment #3: It appears that Permit Condition (EU0001 through EU0004)-001 and Permit Condition (EU0001 through EU0008)-002 both limit the nitrogen oxide emissions from the same emission units. In an effort to eliminate redundant emission limitations, EPA strongly recommends streamlining the applicable requirements.

Response to Comment: The emission limit in Permit Condition (EU0001 through EU0004)-001 is a 100 ton per year NO_x limit that applies to all four turbines. The emission limit in Permit Condition (EU0001 through EU0004)-002 is a NO_x concentration limit that applies to each turbine individually. Because one limit applies to the turbines as a group and the other is for emissions from each individual turbine I chose not to combine the limits and will retain both permit conditions and NO_x limits in the operating permit.

Comment #4: The monitoring/recordkeeping requirements for both nitrogen oxides and sulfur dioxide in Permit Condition (EU0001 through EU0008)-002 require the permittee to monitor the fuel consumption and the ratio of water or steam to fuel being fired in the turbine (for sulfur dioxide). However, there is no indication which turbine is to be monitored and EPA believes all four turbines should be subject to the monitoring and record keeping requirements. Therefore, EPA recommends MDNR clarify the wording in these permit conditions such that it is perfectly clear that all four emission units are subject to the requirements.

Response to Comment: In the monitoring/recordkeeping requirements for this permit condition all references to the “turbine” have been changed to “turbines.” This change, along with the heading referencing (corrected) emission units EU0001 through EU0004, make it clear that the monitoring/recordkeeping apply to all four turbines.

Comment #5: The installation description on the cover page of the draft permit and installation description on page 3 does not indicate the pollutant(s) and/or reason which create the need for a Part 70/Title V operating permit. Therefore, EPA recommends MDNR include the reason McCartney Generating Station is subject to a Part 70 operating permit in the installation description.

Response to Comment: The McCartney Generating Station is a Part 70/Title V source because it is major for greenhouse gas emissions and it is an affected source under the Acid Rain program. A statement has been added to the installation description for clarification.

JW/kjc