

MISSOURI
DEPARTMENT OF
NATURAL RESOURCES

MISSOURI AIR CONSERVATION COMMISSION

PERMIT TO CONSTRUCT

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

Permit Number: **07 2017 - 013**

Project Number: 2014-08-031
Installation Number: 077-0164

Parent Company: City Utilities of Springfield

Parent Company Address: P.O. Box 551, Springfield, MO 65757

Installation Name: City Utilities of Springfield - McCartney Generating Station

Installation Address: 5701 East Farm Road 112, Strafford, MO 65757

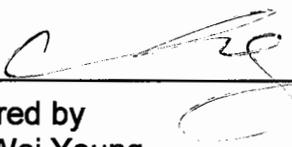
Location Information: Greene County, S1, T29N, R21W

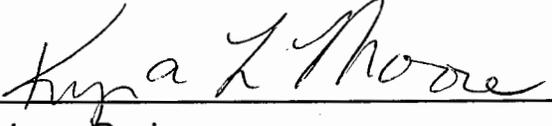
Application for Authority to Construct was made for:

To increase the NO_x and CO limit from 100 tpy to 250 tpy. This review was conducted in accordance with Section (6), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*.

Standard Conditions (on reverse) are applicable to this permit.

Standard Conditions (on reverse) and Special Conditions are applicable to this permit.


Prepared by
Chia-Wei Young
New Source Review Unit


Director or Designee
Department of Natural Resources

JUL 21 2017

Effective Date

STANDARD CONDITIONS:

Permission to construct may be revoked if you fail to begin construction or modification within two years from the effective date of this permit. Permittee should notify the Enforcement and Compliance Section of the Air Pollution Control Program if construction or modification is not started within two years after the effective date of this permit, or if construction or modification is suspended for one year or more.

You will be in violation of 10 CSR 10-6.060 if you fail to adhere to the specifications and conditions listed in your application, this permit and the project review. In the event that there is a discrepancy between the permit application and this permit, the conditions of this permit shall take precedence. Specifically, all air contaminant control devices shall be operated and maintained as specified in the application, associated plans and specifications.

You must notify the Enforcement and Compliance Section of the Department's Air Pollution Control Program of the anticipated date of start up of this (these) air contaminant source(s). The information must be made available within 30 days of actual startup. Also, you must notify the Department's regional office responsible for the area within which you are located within 15 days after the actual start up of this (these) air contaminant source(s).

A copy of the permit application and this permit and permit review shall be kept at the installation address and shall be made available to Department's personnel upon request.

You may appeal this permit or any of the listed special conditions to the Administrative Hearing Commission (AHC), P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.075.6 and 621.250.3. If you choose to appeal, you must file a petition with the AHC within 30 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 choose not to appeal, this certificate, the project review and your application and associated correspondence constitutes your permit to construct. The permit allows you to construct and operate your air contaminant source(s), but in no way relieves you of your obligation to comply with all applicable provisions of the Missouri Air Conservation Law, regulations of the Missouri Department of Natural Resources and other applicable federal, state and local laws and ordinances.

The Air Pollution Control Program invites your questions regarding this air pollution permit. Please contact the Construction Permit Unit using the contact information below.

Contact Information:

Missouri Department of Natural Resources
Air Pollution Control Program
P.O. Box 176
Jefferson City, MO 65102-0176
(573) 751-4817

The regional office information can be found at the following website:

<http://dnr.mo.gov/regions/>

SPECIAL CONDITIONS:

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

The special conditions listed in this permit were included based on the authority granted the Missouri Air Pollution Control Program by the Missouri Air Conservation Law (specifically 643.075) and by the Missouri Rules listed in Title 10, Division 10 of the Code of State Regulations (specifically 10 CSR 10-6.060). For specific details regarding conditions, see 10 CSR 10-6.060 paragraph (12)(A)10. "Conditions required by permitting authority."

City Utilities of Springfield - McCartney Generating Station
Greene County, S1, T29N, R21W

1. Superseding Condition

The conditions of this permit supersede all of the special conditions found in the previously issued construction permits 122000-008 and 122000-008A issued by the Air Pollution Control Program.

2. Annual Emission Limitations

A. City Utilities of Springfield - McCartney Generating Station shall emit less than 250.0 tons of nitrogen oxides (NO_x) combined from the four (4) turbine engines (EU01-1A, EU02-1B, EU03-2A, EU04-2B) in any consecutive 12-month period.

B. City Utilities of Springfield - McCartney Generating Station shall emit less than 250.0 tons of carbon monoxide (CO) combined from the four (4) turbine engines (EU01-1A, EU02-1B, EU03-2A, EU04-2B) in any consecutive 12-month period.

C. City Utilities of Springfield - McCartney Generating Station shall emit less than 11.43 tons of PM_{2.5} combined from the four turbine engines (EU01-1A, EU02-1B, EU03-2A, EU04-2B) in any consecutive 12-month period.

D. City Utilities of Springfield - McCartney Generating Station shall develop and use forms to demonstrate compliance with Special Condition 2.A., 2.B., and 2.C. The forms shall contain at a minimum the following information,

- 1) Installation name
- 2) Installation ID
- 3) Permit number
- 4) Current month
- 5) Current 12-month date range
- 6) Emission factors for each pollutant in lb/mm scf. NO_x, and CO emission factors shall be taken from data recorders with inputs from stack testing as required in Special Conditions 4 and 5 or by CEMS in accordance with Special Condition 6. PM_{2.5} emission factor shall be taken from data recorders with inputs from stack testing performed in the year 2000 for PM₁₀.
- 7) The load level of the engines, in percentages (%).
- 8) Monthly emissions for each emission unit and each pollutant

SPECIAL CONDITIONS:

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calculated using the following equation.

Emissions (tons) = Gas Usage (mmscf) for the month x Emission Factor (lb/mmscf) x (1 ton/2,000 lb)

- 9) Monthly emission calculated by summing all emission from each turbine engine (EU01-1A, EU02-1B, EU03-2A, EU04-2B).
 - 10) 12-Month rolling total emissions from the four turbine engines (EU01-1A, EU02-1B, EU03-2A, EU04-2B) and the sum of all emissions from start-up, shutdown, and malfunction as reported to the Air Pollution Control Program's Compliance/Enforcement Section.
 - 11) Emission limits from Special Conditions 2.A., 2.B., and 2.C.
 - 12) Indication of compliance with Special Conditions 2.A., 2.B., and 2.C.
3. Hourly Emissions Limitations
 - A. City Utilities of Springfield – McCartney Generating Station shall not emit NO_x in excess of 45.0 pounds per hour (lb/hr) from each of the four turbine engines (EU01-1A, EU02-1B, EU03-2A, EU04-2B).
 - B. City Utilities of Springfield – McCartney Generating Station shall not emit CO in excess of 45.0 pounds per hour (lb/hr) from each of the four turbine engines (EU01-1A, EU02-1B, EU03-2A, EU04-2B).
 - C. Compliance with Special Conditions 3.A. and 3.B. shall be maintained by performing stack tests as required by Special Condition 4.
 4. Performance Testing
 - A. City Utilities of Springfield - McCartney Generating Station shall perform stack tests to determine the NO_x and CO emission factors to show compliance with Special Conditions 2.A., 2.B., 3.A., and 3.B.
 - B. Testing shall be performed semi-annually every year for NO_x, except as exempted under Special Conditions 5.A. and 5.B. Testing shall be performed once during the summer season (defined as March 1st through October 31st), as well as once during the winter months (defined as November 1st through February 28th). Each round of tests shall include all four (4) turbine engines.
 - C. For CO, testing shall be performed semi-annually every five (5) years, except as exempted under Special Conditions 5.A. and 5.B. Testing shall be performed once during the summer season (defined as March 1st through October 31st), as well as once during the winter months (defined as November 1st through February 28th). Each round of tests shall include all four (4) turbine engines.

SPECIAL CONDITIONS:

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

- D. Testing shall be performed using the same methodology as specified in 40 CFR Part 75, Appendix E. Appendix E only applies to NO_x emissions. However, the same methodology shall be applied to CO testing. City Utilities of Springfield – McCartney Generating Station shall generate NO_x-to-load curves and CO-to-load curves as specified in CFR Part 75, Appendix E.
 - E. Testing shall be performed either using the same method as the previous tests or using a portable analyzer.
 - F. City Utilities of Springfield – McCartney Generating Station shall notify the Missouri Air Pollution Control Program's Compliance/Enforcement Section at least 30 days prior to the planned tests. If the facility changes its testing protocols from the previous stack tests, it shall also submit a new Proposed Test Plan Form (enclosed) to the Air Pollution Control Program's Compliance/Enforcement Section at least 30 days prior to the planned tests.
 - G. Fuel-Water ratio shall be optimized through stack testing at various load conditions set forth in Special Condition 4.D. For the purpose of this paragraph, optimized shall mean that the water injection rate shall be adjusted so that the NO_x and CO hourly emissions are approximately equal under high load conditions.
 - H. One electronic copy of a written report of the performance test results shall be submitted to Stacktesting@dnr.mo.gov within 60 days of completion of any required testing. The report must include legible copies of the raw data sheets, analytical instrument laboratory data, and complete sample calculations from the required U.S. EPA Method for at least one sample run.
 - I. 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.
5. Seasonal Testing Exemptions
- A. City Utilities of Springfield – McCartney Generating Station shall be exempt from testing any engine during the winter seasons, as required in Special Condition 4.B., that does not operate more than five (5) hours during the winter season. These operating hours shall be used exclusively for maintenance purposes.
 - B. City Utilities of Springfield – McCartney Generating Station shall be exempt from testing any engine during the summer seasons, as required in Special Condition 4.B., that does not operate more

SPECIAL CONDITIONS:

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

than five (5) hours during the summer season. These operating hours shall be used exclusively for maintenance purposes.

- C. In order to demonstrate that the turbines did not operate, City Utilities of Springfield – McCartney Generating Station shall maintain records of operation with, at a minimum, the following information.
- 1) The loading in megawatts (MW)
 - 2) The date and length of time each turbine operations.
- D. If any of the turbine engines are operated more than five (5) operating hours each during the winter or summer season, as defined in Special Conditions 4.B. and 4.C., City Utilities of Springfield – McCartney Generating Station shall follow the procedure below.
- 1) Notify the Compliance/Enforcement Unit of the Air Pollution Control Program within ten (10) days of operating greater than five (5) hours on each of the turbine engines for the particular winter or summer season.
 - 2) Perform stack testing on each turbine that has operated greater than five (5) operating hours per the requirements of Special Condition 4. The testing is to be coordinated with the Missouri Air Pollution Control Program's Enforcement Section and conducted during the winter or summer season in which the turbines are operated.
6. Alternative Method to Stack Testing
- A. In lieu of performing stack tests required in Special Condition 4, City Utilities of Springfield – McCartney Generating Station may install, calibrate, maintain, and operate continuous monitoring systems (CEMS) to monitor NO_x and CO emissions to maintain compliance with the limits in Special Condition 3. The data from the CEMS shall also be used in record keeping form required in Special Condition 2.D. to maintain compliance with Special Condition 2.A. and 2.B.
- B. The CEMS shall be designed to meet the requirements of 40 CFR 60, Appendix B.
- C. The specifications of 40 CFR 60, Appendix F (Quality Assurance/Quality Control) shall apply to the CEMS. Appendix F requirements shall be supplemented with a quarterly notice to the Department with the dates of the quarterly cylinder gas audits and annual relative accuracy test audit.
7. Operational Requirements
- A. City Utilities of Springfield – McCartney Generating Station shall only burn fuel oil with sulfur content of 0.05% by weight or less or natural gas in the four turbine engines (EU01-1A, EU02-1B, EU03-2A, EU04-2B).

SPECIAL CONDITIONS:

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

- B. City Utilities of Springfield – McCartney Generating Station shall demonstrate compliance with the fuel oil sulfur content limit in Special Condition 7.A. by obtaining records of the fuel's sulfur content from the vendor for each shipment of fuel received or by testing each shipment of fuel for the sulfur content in accordance with the method described in 10 CSR 10-6.040, *Reference Methods*.
8. Usage of Backup Fuel
- A. If City Utilities of Springfield – McCartney Generating Station uses distillate fuel, it shall perform a one-time stack testing within 60 days of using the fuel to determine the PM_{2.5}, PM₁₀, PM, SO_x, NO_x, CO and VOC emission factors in lb/MMBtu.
- B. The stack testing required in Special Condition 8.A. shall be performed according to the following procedure.
- 1) For NO_x and CO, Testing shall be performed using the same methodology as specified in 40 CFR Part 75, Appendix E. Appendix E only applies to NO_x emissions. However, the same methodology shall be applied to CO testing. City Utilities of Springfield – McCartney Generating Station shall generate NO_x-to-load curves and CO-to-load curves as specified in CFR Part 75, Appendix E.
 - 2) A completed Proposed Test Plan Form (enclosed) must be submitted to the Air Pollution Control Program 30 days prior to the proposed test date so that the Air Pollution Control Program may arrange a pretest meeting, if necessary, and assure that the test date is acceptable for an observer to be present. The Proposed Test Plan may serve the purpose of notification and must be approved by the Director prior to conducting the required emission testing.
 - 3) One electronic copy of a written report of the performance test results shall be submitted to Stacktesting@dnr.mo.gov within 60 days of completion of any required testing. The report must include legible copies of the raw data sheets, analytical instrument laboratory data, and complete sample calculations from the required U.S. EPA Method for at least one sample run.
 - 4) 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.
- C. The PM_{2.5}, NO_x and CO emission factors determined in Special Condition 8.A. shall be used in the Attachment required in Special Condition 2.D. to maintain compliance with the emission limits in Special Condition 2.A., 2.B., and 2.C.

SPECIAL CONDITIONS:

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

- D. The PM₁₀ and SO_x emission factors determined through stack testing required in Special Condition 8.A. shall be used to calculate their annual emissions, taking into account the 11.43 tpy PM_{2.5} and 250.0 tpy NO_x and CO limits. If the conditioned potential emissions of PM₁₀ and SO_x are greater than their respective *de minimis* level of 15.0 tpy and 40 tpy, then the facility shall do one of the following.
- 1) Submit a request to the Missouri Air Pollution Control Program to amend this permit to include a limit of 15.0 tpy of PM₁₀ and 40 tpy of SO_x increase; or
 - 2) Submit modeling results showing that the installation will still be in compliance with the NAAQS and increment standards for these pollutants.
- E. The PM and VOC emission factors determined through stack testing required in Special Condition 8.A. shall be used to calculate their annual emissions, taking into account the 11.43 tpy PM_{2.5} and 250.0 tpy NO_x and CO limits. If the potential emissions of these pollutants are greater than the major source level of 250.0 tpy, City Utilities of Springfield – McCartney Generating Station shall submit an request to the Missouri Air Pollution Control Program to amend this permit to include limits of 250.0 tpy for PM and VOC.
9. Record Keeping and Reporting Requirements
- A. City Utilities of Springfield - McCartney Generating Station shall maintain all records required by this permit for not less than five years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request.
 - B. City Utilities of Springfield - McCartney Generating Station shall report to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than 10 days after the end of the month during which any record required by this permit shows an exceedance of a limitation imposed by this permit.

REVIEW OF APPLICATION FOR AUTHORITY TO CONSTRUCT AND OPERATE
SECTION (6) REVIEW

Project Number: 2014-08-031
Installation ID Number: 077-0164
Permit Number:

07 2 0 1 7 - 0 1 3

Installation Address:

City Utilities of Springfield - McCartney
Generating Station
5701 East Farm Road 112
Strafford, MO 65757

Parent Company:

City Utilities of Springfield
P.O. Box 551
Springfield, MO 65757

Greene County, S1, T29N, R21W

REVIEW SUMMARY

- City Utilities of Springfield - McCartney Generating Station has applied for authority to increase its NO_x and CO limit from 100 tons per year to 250 tons per year.
- The application was deemed complete on August 15, 2014.
- HAP emissions are expected from the proposed equipment. HAPs of concern from this process are from the combustion of the fuel, specifically, formaldehyde.
- 40 CFR 60, Subpart GG, *Standards of Performance for Stationary Gas Turbines*, of the New Source Performance Standards (NSPS) applies to each of the turbine engines at this installation.
- None of the NESHAPs apply to this installation. None of the currently promulgated MACT regulations apply to the proposed equipment.
- No air pollution control equipment is being used in association with the engines.
- This review was conducted in accordance with Section (6) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Conditioned potential emissions of NO_x and CO are above de minimis levels.
- This installation is located in Greene County, an attainment area for all criteria pollutants.
- This installation is on the List of Named Installations found in 10 CSR 10-6.020(3)(B), Table 2, Category 27. The installation's major source level is 250 tons per year and fugitive emissions are counted toward major source applicability.
- Ambient air quality modeling was performed to determine the ambient impact of NO_x, CO, and formaldehyde.

- Emissions testing is required for the equipment as a part of this permit.
- A modification application to your Part 70 Operating Permit is required for this installation within one (1) year of permit issuance.
- Approval of this permit is recommended with special conditions.

INSTALLATION DESCRIPTION

City Utilities of Springfield – McCartney Generating Station is an electrical generation peaking facility with two combustion turbines (Units 1 and 2). Each turbine utilizes two modified jet engines for a total of four (4) engines. Each engine has a maximum hourly design rate of 265.3 MMBtu/hr of heat input when burning natural gas and is capable of generating 31 MW. The engines use distillate fuel oil as backup fuel and has a slightly higher maximum hourly design rate (272.0 MMBtu/hr) when burning the backup fuel. The installation has never burned distillate fuel since the commencement of operations.

The facility is a minor source for construction permits and a Part 70 installation for operating permits. In Permit No. 122000-008, the facility was limited to 100 tpy of NO_x and CO, so based on emissions alone, the facility would've qualified for an intermediate operating permit. However, because the facility is subject to the Acid Rain Program, a Part 70 permit is required.

The following New Source Review permits have been issued to City Utilities of Springfield - McCartney Generating Station from the Air Pollution Control Program. Permit 122000-008 allowed the construction of eight (8) simple-cycle turbine engines, but only four (4) were constructed.

Table 1: Permit History

Permit Number	Description
122000-008	Installation of eight (8) simple-cycle turbine engines and two (2) fuel storage tanks.
122000-008A	Modify testing frequency.

PROJECT DESCRIPTION

In Permit 122000-008, City Utilities of Springfield – McCartney Generating Station is limited to 100 tons per year of NO_x and CO. However, this facility is listed under category 27 for named installations. Under category 27, the facility's has to account for fugitive emissions in determining major source applicability, but the major source level for each criteria pollutant is 250 tons per year. Therefore, the facility submitted a request to increase the NO_x and CO limits from 100 tpy to 250 tpy. No other changes are proposed for the facility.

EMISSIONS/CONTROLS EVALUATION

NO_x and CO emissions were calculated based on emission rates supplied by the installation. According to the previous permit issued to the installation (No. 122000-008A), the installation is required to either install CEMs to track NO_x and CO emissions or perform periodic stack testing. So far, the facility has chosen to perform periodic stack testing. The facility will be required to perform stack testing to ensure that the emissions from each engine does not exceed the emission rates, which is 45.0 lb/hr for each engine for both CO and NO_x, because modeling performed for CO and NO_x are based on these values. The installation is required to limit its NO_x and CO emissions to less than 250.0 tpy for each pollutant so that the facility would be a minor source. The facility shall use the most current stack testing results or CEMs data to calculate the emissions for compliance with the 250.0 tpy limit.

No testing was required for PM₁₀ in the previous permits issued to the installation. However, the facility performed stack tests in 2000 to determine the PM₁₀ emissions from the turbines. PM₁₀ emissions were calculated using these stack test results. PM_{2.5} emissions were calculated assuming that all of the PM₁₀ are PM_{2.5}. The facility's baseline actual emissions for PM_{2.5} are 1.43 tpy from the years 2012-2013. The facility is allowed an increase of 10.0 tpy of PM_{2.5} without triggering modeling requirements. Therefore, the PM_{2.5} emissions shall be limited to 11.43 tpy. With the 11.43 tpy PM_{2.5} limit, the PM₁₀ will be automatically limited to less than the de minimis level of 15.0 tpy.

Potential emissions of formaldehyde were calculated using the 2002 performance test data. Tests were performed at different loadings. Each year, the facility estimates the hours operated at each loading and calculate a different overall average emission factor. The potential emissions of formaldehyde were calculated using the maximum emission factor for each engine from the last ten years. The potential emissions are expected to be greater than the formaldehyde SMAL of 2.0 tons per year if operating during the entire year. With the limit of 250.0 tons of NO_x and CO, the conditioned potential emissions of formaldehyde are limited to less than the SMAL. However, the NO_x and CO emission factors may change in the future based on new stack tests and engine loadings resulting in formaldehyde emissions greater than the SMAL. Therefore, modeling was performed on formaldehyde to ensure that the RAL is not exceeded.

VOC emissions were calculated using data from a stack test performed in 2002. SO_x emissions were calculated using an emission factor in Appendix D to 40 CFR Part 75, Section 2.3.1.1.

The following table provides an emissions summary for this project. The potential emissions of the installation from Permit 122000-008 overestimates emissions since they are based on manufacturer's emission rates as well as eight (8) engines instead of four (4). Therefore, the existing potential emissions of the installation were recalculated using stack testing results for four (4) engines. The Baseline Actual Emissions (BAE) is the average of the emissions from 2012 and 2013.

The facility has never used fuel oil, but if fuel oil is ever used, the installation shall

perform stack testing on the engines using fuel oil to determine PM_{2.5}, PM₁₀, PM, SO_x, NO_x, VOC, and CO emission factors. For PM_{2.5}, NO_x and CO, the emission factors shall be used to track emissions to ensure that the PM_{2.5}, NO_x and CO emissions are less than the limits in Table 2. For all other pollutants, the facility shall calculate their conditioned potential emissions based on the limits in Table 2. If PM₁₀ and SO_x potential emissions are greater than their respective de minimis levels, the installation shall either apply for a permit amendment to require that the PM₁₀ and SO_x emissions increase be limited to less than their de minimis level of 15.0 and 40.0 tpy, respectively, or submit modeling results to show that the facility will still be in compliance with the NAAQS and increment standards. If the PM and VOC potential emissions are greater than the major source level of 250.0 tpy, the facility shall apply for a permit amendment to require that the PM and VOC emissions be limited to 250.0 tpy each.

Table 2: Emissions Summary (tpy)

Pollutant	Regulatory De Minimis Levels	Existing Potential Emissions	Baseline Actual Emissions 2012-2013	Potential Emissions Minus Baseline Actual Emissions (tpy)	New Installation Conditioned Potential
PM	25.0	35.76	1.43	34.33	N/A
PM ₁₀	15.0	35.76	1.43	34.33	N/A
PM _{2.5}	10.0	35.76	1.43	34.33	<11.43
SO _x	40.0	2.81	0.16	2.64	N/A
NO _x	40.0	¹ <100.0	36.93	788.4	<250.0
VOC	40.0	19.48	0.81	18.67	N/A
CO	100.0	¹ <100.0	28.92	788.4	<250.0
GHG (CO ₂ e)	75,000	N/D	N/D	² 511,340	N/A
GHG (mass)	250.0	N/D	N/D	² 516,440	N/A
Formaldehyde	10.0/2.0 ³	N/D	N/D	3.87	N/A ⁴
HAPs	10.0/25.0	4.06	0.18	3.87	N/A

N/A = Not Applicable, N/D = Not Determined

Note 1: NO_x and CO emissions were limited to 100 tpy through Permit No. 122000-008.

Note 2: PSD permitting is not triggered from GHG emissions alone.

Note 3: 2.0 tpy is the SMAL for Formaldehyde

Note 4: Formaldehyde emissions will be limited to less than the SMAL of 2.0 tpy due to CO and NO_x limits based on current CO and NO_x emission factors. However, because the CO and NO_x emissions can change based on stack testing results, thereby affecting the formaldehyde emissions, modeling was performed to ensure that the formaldehyde ambient impact does not exceed the RAL.

PERMIT RULE APPLICABILITY

This review was conducted in accordance with Section (6) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions increase of NO_x and CO are above de minimis levels but below major source levels.

APPLICABLE REQUIREMENTS

City Utilities of Springfield - McCartney Generating Station shall comply with the following applicable requirements. The Missouri Air Conservation Laws and Regulations should be consulted for specific record keeping, monitoring, and reporting requirements. Compliance with these emission standards, based on information submitted in the application, has been verified at the time this application was approved. For a complete list of applicable requirements for your installation, please consult your operating permit.

GENERAL REQUIREMENTS

- *Operating Permits*, 10 CSR 10-6.065
- *Start-Up, Shutdown, and Malfunction Conditions*, 10 CSR 10-6.050
- *Submission of Emission Data, Emission Fees and Process Information*, 10 CSR 10-6.110
 - Per 10 CSR 10-6.110(4)(B)2.B(II) and (4)(B)2.C(II) a full EIQ is required for the first full calendar year the equipment (or modifications) approved by this permit are in operation.
- *Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin*, 10 CSR 10-6.170
- *Restriction of Emission of Visible Air Contaminants*, 10 CSR 10-6.220
- *Restriction of Emission of Odors*, 10 CSR 10-6.165

SPECIFIC REQUIREMENTS

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

AMBIENT AIR QUALITY IMPACT ANALYSIS

Ambient air quality impact analysis was performed to determine the ambient impacts of CO and NO_x for NAAQS compliance and formaldehyde for compliance with the RAL. For CO, the concentrations for the 1-hour and 8-hour average periods are below the significance levels of 2,000 µg/m³ and 500 µg/m³, respectively. Therefore, no further analysis is required for this pollutant.

For NO_x, both the annual and the 1-hour averaging period concentrations exceed the significance level of 1 µg/m³ and 7.55 µg/m³, respectively, thereby triggering a full impact analysis for NO_x. Full impact analysis shows several violation of the NO_x NAAQS and increment standards. However, according to EPA guidance, if a facility can demonstrate that it has insignificant effects at violating receptors at the time of the predicted violation, approval of the NO_x analysis can be provided. Results show that for both annual and 1-hour averaging periods, City Utilities of Springfield - McCartney Generating Station does not have any significant impact on any violating receptors.

More information regarding the ambient air quality impact analysis for NO_x and CO can be found in the memorandum "Ambient Air Quality Impact Analysis (AAQIA) for the City Utilities – McCartney Generating Station – May Revision" from the Construction Permit Modeling Unit on May 16, 2017.

Modeling was performed on formaldehyde using EPA modeling program AERSCREEN. Results show that the 24-hour concentration (0.75 µg/m³) will be less than the RAL of 9.8 µg/m³. The annual concentration (0.12 µg/m³) will be greater than the RAL of 0.08. However, the Missouri Air Pollution Control Program allows the maximum exposure to be ten times the RAL, which is 0.80 µg/m³. Therefore, formaldehyde concentration is deemed to be in compliance on an annual basis.

STAFF RECOMMENDATION

On the basis of this review conducted in accordance with Section (6), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*, it is recommended that this permit be granted with special conditions.

PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated July 7, 2014, received August 15, 2014, designating City Utilities of Springfield as the owner and operator of the installation.

The following documents were relied upon in the preparation of this permit.

- "Ambient Air Quality Impact Analysis (AAQIA) for the City Utilities – McCartney Generating Station – May Revision" memorandum from the Construction Permit Modeling Unit on May 16, 2017.
- E-mail communication between City Utilities of Springfield – McCartney Generating Station and the Construction Permit Unit of the Missouri Air Pollution Control Program.

APPENDIX A

Abbreviations and Acronyms

%percent	m/smeters per second
°Fdegrees Fahrenheit	Mgal1,000 gallons
acfmactual cubic feet per minute	MWmegawatt
BACTBest Available Control Technology	MHDRmaximum hourly design rate
BMPsBest Management Practices	MMBtuMillion British thermal units
BtuBritish thermal unit	MMCFmillion cubic feet
CAM Compliance Assurance Monitoring	MSDSMaterial Safety Data Sheet
CAS Chemical Abstracts Service	NAAQSNational Ambient Air Quality Standards
CEMS Continuous Emission Monitor System	NESHAPs National Emissions Standards for Hazardous Air Pollutants
CFR Code of Federal Regulations	NO_xnitrogen oxides
COcarbon monoxide	NSPSNew Source Performance Standards
CO₂carbon dioxide	NSRNew Source Review
CO₂ecarbon dioxide equivalent	PMparticulate matter
COMS Continuous Opacity Monitoring System	PM_{2.5}particulate matter less than 2.5 microns in aerodynamic diameter
CSR Code of State Regulations	PM₁₀particulate matter less than 10 microns in aerodynamic diameter
dscfdry standard cubic feet	ppmparts per million
EIQEmission Inventory Questionnaire	PSDPrevention of Significant Deterioration
EP Emission Point	PTEpotential to emit
EPAEnvironmental Protection Agency	RACTReasonable Available Control Technology
EU Emission Unit	RALRisk Assessment Level
fps feet per second	SCCSource Classification Code
ft feet	scfmstandard cubic feet per minute
GACTGenerally Available Control Technology	SDSSafety Data Sheet
GHGGreenhouse Gas	SICStandard Industrial Classification
gpmgallons per minute	SIPState Implementation Plan
grgrains	SMALScreening Model Action Levels
GWP Global Warming Potential	SO_xsulfur oxides
HAPHazardous Air Pollutant	SO₂sulfur dioxide
hrhour	tphtons per hour
hphorsepower	tpytons per year
lbpound	VMTvehicle miles traveled
lbs/hrpounds per hour	VOCVolatile Organic Compound
MACTMaximum Achievable Control Technology	
µg/m³micrograms per cubic meter	

Air Pollution Control Program Table of Hazardous Air Pollutants and Screening Model Action Levels

Chemical	CAS #	SMAL tons/yr	Group ID	VOC	PM	Chemical	CAS #	SMAL tons/yr	Group ID	VOC	PM
ACETALDEHYDE	75-07-0	9		Y	N	CHLOROMETHYL METHYL ETHER	107-30-2	0.1		Y	N
ACETAMIDE	60-35-5	1		Y	N	CHLOROPRENE	126-99-8	1		Y	N
ACETONITRILE	75-05-8	4		Y	N	CHROMIUM (VI) COMPOUNDS		0.002	L	N	Y
ACETOPHENONE	98-86-2	1		Y	N	CHROMIUM COMPOUNDS		5	L	N	Y
ACETYLAMINOFLUORINE, [2-]	53-96-3	0.005	V	Y	Y	CHRYSENE	218-01-9	0.01	V	Y	N
ACROLEIN	107-02-8	0.04		Y	N	COBALT COMPOUNDS		0.1	M	N	Y
ACRYLAMIDE	79-06-1	0.02		Y	N	COKE OVEN EMISSIONS	8007-45-2	0.03	N	Y	N
ACRYLIC ACID	79-10-7	0.6		Y	N	CRESOL, [META-]	108-39-4	1	B	Y	N
ACRYLONITRILE	107-13-1	0.3		Y	N	CRESOL, [ORTHO-]	95-48-7	1	B	Y	N
ALLYL CHLORIDE	107-05-1	1		Y	N	CRESOL, [PARA-]	106-44-5	1	B	Y	N
AMINOBIIPHENYL, [4-]	92-67-1	1	V	Y	N	CRESOLS (MIXED ISOMERS)	1319-77-3	1	B	Y	N
ANILINE	62-53-3	1		Y	N	CUMENE	98-82-8	10		Y	N
ANISIDINE, [ORTHO-]	90-04-0	1		Y	N	CYANIDE COMPOUNDS		0.1	O	Y	N
ANTHRACENE	120-12-7	0.01	V	Y	N	DDE	72-55-9	0.01	V	Y	Y
ANTIMONY COMPOUNDS		5	H	N	Y	DI(2-ETHYLHEXYL) PHTHALATE, (DEHP)	117-81-7	5		Y	N
ANTIMONY PENTAFLUORIDE	7783-70-2	0.1	H	N	Y	DIAMINOTOLUENE, [2,4-]	95-80-7	0.02		Y	N
ANTIMONY POTASSIUM TARTRATE	28300-74-5	1	H	N	Y	DIAZOMETHANE	334-88-3	1		Y	N
ANTIMONY TRIOXIDE	1309-64-4	1	H	N	Y	DIBENZ(A,H)ANTHRACENE	53-70-3	0.01	V	Y	N
ANTIMONY TRISULFIDE	1345-04-6	0.1	H	N	Y	DIOXINS/FURANS		6E-07	D,V	Y	N
ARSENIC COMPOUNDS		0.005	I	N	Y	DIBENZOFURAN	132-64-9	5	V	Y	N
ASBESTOS	1332-21-4	0	A	N	Y	DIBROMO-3-CHLOROPROPANE, [1,2-]	96-12-8	0.01		Y	N
BENZ(A)ANTHRACENE	56-55-3	0.01	V	Y	N	DIBROMOETHANE, [1,2-]	106-93-4	0.1		Y	N
BENZENE	71-43-2	2		Y	N	DIBUTYL PHTHALATE	84-74-2	10		Y	Y
BENZIDINE	92-87-5	0.0003	V	Y	N	DICHLOROBENZENE, [1,4-]	106-46-7	3		Y	N
BENZO(A)PYRENE	50-32-8	0.01	V	Y	N	DICHLOROBENZIDENE, [3,3-]	91-94-1	0.2	V	Y	Y
BENZO(B)FLUORANTHENE	205-99-2	0.01	V	Y	N	DICHLOROETHANE, [1,1-]	75-34-3	1		Y	N
BENZO(K)FLUORANTHENE	207-08-9	0.01	V	Y	N	DICHLOROETHANE, [1,2-]	107-06-2	0.8		Y	N
BENZOTRICHLORIDE	98-07-7	0.006		Y	N	DICHLOROETHYLENE, [1,1-]	75-35-4	0.4		Y	N
BENZYL CHLORIDE	100-44-7	0.1		Y	N	DICHLOROMETHANE	75-09-2	10		N	N
BERYLLIUM COMPOUNDS		0.008	J	N	Y	DICHLOROPHENOXY ACETIC ACID, [2,4-]	94-75-7	10	C	Y	Y
BERYLLIUM SALTS		2E-05	J	N	Y	DICHLOROPROPANE, [1,2-]	78-87-5	1		Y	N
BIPHENYL, [1,1-]	92-52-4	10	V	Y	N	DICHLOROPROPENE, [1,3-]	542-75-6	1		Y	N
BIS(CHLOROETHYL)ETHER	111-44-4	0.06		Y	N	DICHLORVOS	62-73-7	0.2		Y	N
BIS(CHLOROMETHYL)ETHER	542-88-1	0.0003		Y	N	DIETHANOLAMINE	111-42-2	5		Y	N
BROMOFORM	75-25-2	10		Y	N	DIETHYL SULFATE	64-67-5	1		Y	N
BROMOMETHANE	74-83-9	10		Y	N	DIETHYLENE GLYCOL MONOBUTYL ETHER	112-34-5	5	P	Y	N
BUTADIENE, [1,3-]	106-99-0	0.07		Y	N	DIMETHOXYBENZIDINE, [3,3-]	119-90-4	0.1	V	Y	Y
BUTOXYETHANOL ACETATE, [2-]	112-07-2	5	P	Y	N	DIMETHYL BENZIDINE, [3,3-]	119-93-7	0.008	V	Y	Y
BUTYLENE OXIDE, [1,2-]	106-88-7	1		Y	N	DIMETHYL CARBAMOYL CHLORIDE	79-44-7	0.02		Y	N
CADMIUM COMPOUNDS		0.01	K	N	Y	DIMETHYL FORMAMIDE	68-12-2	1		Y	N
CALCIUM CYANAMIDE	158-62-7	10		Y	Y	DIMETHYL HYDRAZINE, [1,1-]	57-14-7	0.008		Y	N
CAPROLACTAM (Delisted)	105-60-2					DIMETHYL PHTHALATE	131-11-3	10		Y	N
CAPTAN	133-06-2	10		Y	Y	DIMETHYL SULFATE	77-78-1	0.1		Y	N
CARBARYL	63-25-2	10	V	Y	Y	DIMETHYLAMINOAZOBENZENE, [4-]	60-11-7	1		Y	N
CARBON DISULFIDE	75-15-0	1		Y	N	DIMETHYLANILINE, [N-N-]	121-69-7	1		Y	N
CARBON TETRACHLORIDE	56-23-5	1		Y	N	DINITRO-O-CRESOL, [4,6-] (Note 6)	534-52-1	0.1	E	Y	Y
CARBONYL SULFIDE	463-58-1	5		Y	N	DINITROPHENOL, [2,4-]	51-28-5	1		Y	N
CATECHOL	120-80-9	5		Y	N	DINITROTOLUENE, [2,4-]	121-14-2	0.02		Y	N
CHLORAMBEN	133-90-4	1		Y	Y	DIOXANE, [1,4-]	123-91-1	6		Y	N
CHLORDANE	57-74-9	0.01		Y	Y	DIPHENYLHYDRAZINE, [1,2-]	122-66-7	0.09	V	Y	Y
CHLORINE	7782-50-5	0.1		N	N	DIPHENYLMETHANE DIISOCYANATE, [4,4-]	101-68-8	0.1	V	Y	N
CHLOROACETIC ACID	79-11-8	0.1		Y	N	EPICHLOROHYDRIN	106-89-8	2		Y	N
CHLOROACETOPHENONE, [2-]	532-27-4	0.06		Y	N	ETHOXYETHANOL, [2-]	110-80-5	10	P	Y	N
CHLOROBENZENE	108-90-7	10		Y	N	ETHOXYETHYL ACETATE, [2-]	111-15-9	5	P	Y	N

Air Pollution Control Program

Table of Hazardous Air Pollutants and Screening Model Action Levels

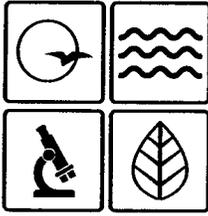
Chemical	CAS #	SMAL tons/yr	Group ID	VOC	PM	Chemical	CAS #	SMAL tons/yr	Group ID	VOC	PM
CHLOROBENZILATE	510-15-6	0.4	V	Y	Y	ETHYL ACRYLATE	140-88-5	1		Y	N
CHLOROFORM	67-66-3	0.9		Y	N	ETHYL BENZENE	100-41-4	10		Y	N
ETHYL CHLORIDE	75-00-3	10		Y	N	NITROBENZENE	98-95-3	1		Y	N
ETHYLENE GLYCOL	107-21-1	10		Y	N	NITROBIPHENYL, [4-]	92-93-3	1	V	Y	N
ETHYLENE GLYCOL MONOBUTYL ETHER (Delisted)	111-76-2					NITROPHENOL, [4-]	100-02-7	5		Y	N
ETHYLENE GLYCOL MONOHEXYL ETHER	112-25-4	5	P	Y	N	NITROPROPANE, [2-]	79-46-9	1		Y	N
ETHYLENE IMINE [AZIRIDINE]	151-56-4	0.003		Y	N	NITROSODIMETHYLAMINE, [N-]	62-75-9	0.001		Y	N
ETHYLENE OXIDE	75-21-8	0.1		Y	N	NITROSOMORPHOLINE, [N-]	59-89-2	1		Y	N
ETHYLENE THIOUREA	96-45-7	0.6		Y	Y	NITROSO-N-METHYLUREA, [N-]	684-93-5	0.0002		Y	N
FORMALDEHYDE	50-00-0	2		Y	N	OCTACHLORONAPHTHALENE	2234-13-1	0.01	V	Y	N
GLYCOL ETHER (ETHYLENE GLYCOL ETHERS)		5	P	Y	N	PARATHION	56-38-2	0.1		Y	Y
GLYCOL ETHER (DIETHYLENE GLYCOL ETHERS)		5	P	Y	N	PCB [POLYCHLORINATED BIPHENYLS]	1336-36-3	0.009	X	Y	Y
HEPTACHLOR	76-44-8	0.02		Y	N	PENTACHLORONITROBENZENE	82-68-8	0.3		Y	N
HEXACHLORO BENZENE	118-74-1	0.01		Y	N	PENTACHLOROPHENOL	87-86-5	0.7		Y	N
HEXACHLORO BUTADIENE	87-68-3	0.9		Y	N	PHENOL	108-95-2	0.1		Y	N
HEXACHLORO CYCLOHEXANE, [ALPHA-]	319-84-6	0.01	F	Y	N	PHENYLENEDIAMINE, [PARA-]	106-50-3	10		Y	N
HEXACHLORO CYCLOHEXANE, [BETA-]	319-85-7	0.01	F	Y	N	PHOSGENE	75-44-5	0.1		Y	N
HEXACHLORO CYCLOHEXANE, [DELTA-]	319-86-8	0.01	F	Y	N	PHOSPHINE	7803-51-2	5		N	N
HEXACHLORO CYCLOHEXANE, [TECHNICAL]	608-73-1	0.01	F	Y	N	PHOSPHOROUS (YELLOW OR WHITE)	7723-14-0	0.1		N	N
HEXACHLORO CYCLOPENTADIENE	77-47-4	0.1		Y	N	PHTHALIC ANHYDRIDE	85-44-9	5		Y	N
HEXACHLOROETHANE	67-72-1	5		Y	N	POLYCYCLIC ORGANIC MATTER		0.01	V	Y	N
HEXAMETHYLENE, -1,6-DIISOCYANATE	822-06-0	0.02		Y	N	PROPANE SULTONE, [1,3-]	1120-71-4	0.03		Y	Y
HEXAMETHYLPHOSPHORAMIDE	680-31-9	0.01		Y	N	PROPIOLACTONE, [BETA-]	57-57-8	0.1		Y	N
HEXANE, [N-]	110-54-3	10		Y	N	PROPIONALDEHYDE	123-38-6	5		Y	N
HYDRAZINE	302-01-2	0.004		N	N	PROPOXUR [BAYGON]	114-26-1	10		Y	Y
HYDROGEN CHLORIDE	7647-01-0	10		N	N	PROPYLENE OXIDE	75-56-9	5		Y	N
HYDROGEN FLUORIDE	7664-39-3	0.1		N	N	PROPYLENEIMINE, [1,2-]	75-55-8	0.003		Y	N
HYDROQUINONE	123-31-9	1		Y	N	QUINOLINE	91-22-5	0.006		Y	N
INDENO(1,2,3CD)PYRENE	193-39-5	0.01	V	Y	N	QUINONE	106-51-4	5		Y	N
ISOPHORONE	78-59-1	10		Y	N	RADIONUCLIDES		Note 1	Y	N	Y
LEAD COMPOUNDS		0.01	Q	N	Y	SELENIUM COMPOUNDS		0.1	W	N	Y
LINDANE [GAMMA-HEXACHLORO CYCLOHEXANE]	58-89-9	0.01	F	Y	N	STYRENE	100-42-5	1		Y	N
MALEIC ANHYDRIDE	108-31-6	1		Y	N	STYRENE OXIDE	96-09-3	1		Y	N
MANGANESE COMPOUNDS		0.8	R	N	Y	TETRACHLORODIBENZO-P-DIOXIN, [2,3,7,8]	1746-01-6	6E-07	D,V	Y	Y
MERCURY COMPOUNDS		0.01	S	N	N	TETRACHLOROETHANE, [1,1,2,2-]	79-34-5	0.3		Y	N
METHANOL	67-56-1	10		Y	N	TETRACHLOROETHYLENE	127-18-4	10		N	N
METHOXYCHLOR	72-43-5	10	V	Y	Y	TITANIUM TETRACHLORIDE	7550-45-0	0.1		N	N
METHOXYETHANOL, [2-]	109-86-4	10	P	Y	N	TOLUENE	108-88-3	10		Y	N
METHYL CHLORIDE	74-87-3	10		Y	N	TOLUENE DIISOCYANATE, [2,4-]	584-84-9	0.1		Y	N
METHYL ETHYL KETONE (Delisted)	78-93-3					TOLUIDINE, [ORTHO-]	95-53-4	4		Y	N
METHYL HYDRAZINE	60-34-4	0.06		Y	N	TOXAPHENE	8001-35-2	0.01		Y	N
METHYL IODIDE	74-88-4	1		Y	N	TRICHLOROBENZENE, [1,2,4-]	120-82-1	10		Y	N
METHYL ISOBUTYL KETONE	108-10-1	10		Y	N	TRICHLOROETHANE, [1,1,1-]	71-55-6	10		N	N
METHYL ISOCYANATE	624-83-9	0.1		Y	N	TRICHLOROETHANE, [1,1,2-]	79-00-5	1		Y	N
METHYL METHACRYLATE	80-62-6	10		Y	N	TRICHLOROETHYLENE	79-01-6	10		Y	N
METHYL TERT-BUTYL ETHER	1634-04-4	10		Y	N	TRICHLOROPHENOL, [2,4,5-]	95-95-4	1		Y	N
METHYLCYCLOPENTADIENYL MANGANESE	12108-13-3	0.1	R	N	Y	TRICHLOROPHENOL, [2,4,6-]	88-06-2	6		Y	N
METHYLENE BIS(2-CHLOROANILINE), [4,4-]	101-14-4	0.2	V	Y	Y	TRIETHYLAMINE	121-44-8	10		Y	N
METHYLENEDIANILINE, [4,4-]	101-77-9	1	V	Y	N	TRIFLURALIN	1582-09-8	9		Y	Y
METHYLNAPHTHALENE, [2-]	91-57-6	0.01	V	Y	N	TRIMETHYLPENTANE, [2,2,4-]	540-84-1	5		Y	N
MINERAL FIBERS		0	T	N	Y	URETHANE [ETHYL CARBAMATE]	51-79-6	0.8		Y	N
NAPHTHALENE	91-20-3	10	V	Y	N	VINYL ACETATE	108-05-4	1		Y	N
NAPHTHYLAMINE, [ALPHA-]	134-32-7	0.01	V	Y	N	VINYL BROMIDE	593-60-2	0.6		Y	N
NAPHTHYLAMINE, [BETA-]	91-59-8	0.01	V	Y	N	VINYL CHLORIDE	75-01-4	0.2		Y	N



Air Pollution Control Program Table of Hazardous Air Pollutants and Screening Model Action Levels

Chemical	CAS #	SMAL tons/yr	Group ID	VOC	PM	Chemical	CAS #	SMAL tons/yr	Group ID	VOC	PM
NICKEL CARBONYL	13463-39-3	0.1	U	N	Y	XYLENE, [META-]	108-38-3	10	G	Y	N
NICKEL COMPOUNDS		1	U	N	Y	XYLENES (MIXED ISOMERS)	1330-20-7	10	G	Y	N
NICKEL REFINERY DUST		0.08	U	N	Y						
NICKEL SUBSULFIDE	12035-72-2	0.04	U	N	Y						

Legend	
Group ID	
A	Asbestos
B	Cresols/Cresylic Acid (isomers and mixtures)
C	2,4 - D, Salts and Esters
D	Dibenzofurans, Dibenzodioxins
E	4, 6 Dinitro-o-cresol, and Salts
F	Lindane (all isomers)
G	Xylenes (all isomers and mixtures)
H	Antimony Compounds
I	Arsenic Compounds
J	Beryllium Compounds
K	Cadmium Compounds
L	Chromium Compounds
M	Cobalt Compounds
N	Coke Oven Emissions
O	Cyanide Compounds
P	Glycol Ethers
Q	Lead Compounds (except elemental Lead)
R	Manganese Compounds
S	Mercury Compounds
T	Fine Mineral Fibers
U	Nickel Compounds
V	Polycyclic Organic Matter
W	Selenium Compounds
X	Polychlorinated Biphenyls (Aroclors)
Y	Radionuclides
Notes	The SMAL for radionuclides is defined as the effective dose equivalent to 0.3 millirems per year for 7 years exposure associated with a cancer risk of 1 in 1 million



Missouri Department of dnr.mo.gov

NATURAL RESOURCES

Eric R. Greitens, Governor

Carol S. Comer, Director

JUL 21 2017

Mr. Daniel Hedrick
Manager - Environmental Compliance
City Utilities of Springfield - McCartney Generating Station
P.O. Box 551
Springfield, MO 65757

RE: New Source Review Permit - Project Number: 2014-08-031

Dear Mr. Hedrick:

Enclosed with this letter is your permit to construct. Please study it carefully and refer to Appendix A for a list of common abbreviations and acronyms used in the permit. Also, note the special conditions, if any, on the accompanying pages. The document entitled, "Review of Application for Authority to Construct," is part of the permit and should be kept with this permit in your files. Operation in accordance with these conditions, your new source review permit application and your amended operating permit is necessary for continued compliance. The reverse side of your permit certificate has important information concerning standard permit conditions and your rights and obligations under the laws and regulations of the State of Missouri.

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

If you were adversely affected by this permit decision, you may be entitled to pursue an appeal before the administrative hearing commission pursuant to Sections 621.250 and 643.075.6 RSMo. To appeal, you must file a petition with the administrative hearing commission within thirty days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If any such petition is sent by registered mail or certified mail, it will be deemed filed on the date it is mailed; if it is sent by any method other than registered mail or certified mail, it will be deemed filed on the date it is received by the administrative hearing commission, whose contact information is: Administrative Hearing Commission, United States Post Office Building, 131 West High Street, Third Floor, P.O. Box 1557, Jefferson City, Missouri 65102, phone: 573-751-2422, fax: 573-751-5018, website: www.oa.mo.gov/ahc.



Recycled paper

Mr. Daniel Hedrick
Page Two

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

Sincerely,

AIR POLLUTION CONTROL PROGRAM



Susan Heckenkamp
New Source Review Unit Chief

SH:cj

Enclosures

c: Southwest Regional Office
PAMS File: 2014-08-031

Permit Number: