

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: OP2018-021

Expiration Date: MAR 09 2023

Installation ID: 187-0075

Project Number: 2016-01-002

Installation Name and Address

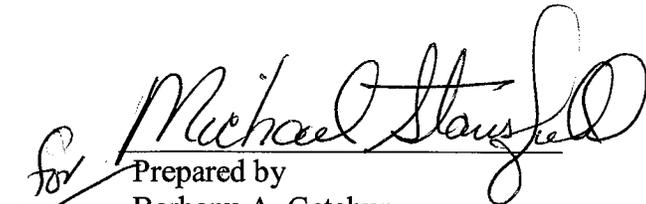
Farmington Light & Power
110 West Columbia Street
Farmington, MO 63640-1792
St. Francois County

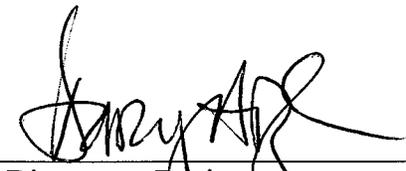
Parent Company's Name and Address

City of Farmington
110 West Columbia Street
Farmington MO, 63640

Installation Description:

Farmington Light & Power operates eight (8) sets of Cummins/Onan Model 2000.2.DQKC internal combustion diesel engine generators. The diesel engine generators are intended for standby electric power production in the event of a power transmission failure affecting the city of Farmington. The generators will also be used proactively for peak-shaving purposes and for sales to parties outside the Farmington Light & Power system.


Prepared by
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Operating Permit Unit


Director or Designee
Department of Natural Resources

MAR 09 2018

Effective Date

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I. Installation Equipment Listing

EMISSION UNITS WITH LIMITATIONS

The following list provides a description of the equipment at this installation that emits air pollutants and that are identified as having unit-specific emission limitations.

Emission Unit #	Description of Emission Unit	Make/Model	Year Engine Installed
Elm Street Substation Units			
EP01	Internal Combustion Diesel Engine Generator	Cummins/Onan Model 2000.2.DQKC, Serial # L010313601	2002
EP02	Internal Combustion Diesel Engine Generator	Cummins/Onan Model 2000.2.DQKC, Serial # K010307761	2002
EP03	Internal Combustion Diesel Engine Generator	Cummins/Onan Model 2000.2.DQKC, Serial # L010313599	2002
Walton Street Substation Units			
EP07	Internal Combustion Diesel Engine Generator	Cummins/Onan Model 2000.2.DQKC, Serial # L010313595	2002
Overall Road Substation Units			
EP11	Internal Combustion Diesel Engine Generator	Cummins/Onan Model 2000.2.DQKC, Serial # K010307763	2002
EP12	Internal Combustion Diesel Engine Generator	Cummins/Onan Model 2000.2.DQKC, Serial # K010307762	2002
EP13	Internal Combustion Diesel Engine Generator	Cummins/Onan Model 2000.2.DQKC, Serial # K010307765	2002
EP14	Internal Combustion Diesel Engine Generator	Cummins/Onan Model 2000.2.DQKC, Serial # K010307764	2002

EMISSION UNITS WITHOUT SPECIFIC LIMITATIONS

The following list provides a description of the equipment that does not have unit specific limitations at the time of permit issuance.

Description of Emission Unite

Three (3) Above Ground Diesel Fuel Storage Tanks, 1,250 Gallon Capacity (each),
Located at Elm Street Substation

One (1) Above Ground Diesel Fuel Storage Tank, 1,250 Gallon Capacity,
Located at Walton Street Substation

Four (4) Above Ground Diesel Fuel Storage Tanks, 1,250 Gallon Capacity (each),
Located at Overall Road Substation

II. Plant Wide Emission Limitations

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

Permit Condition PW001

10 CSR 10-6.060 Construction Permits Required
Construction Permit No. 042002-011

Emission Limitation:

The permittee shall not discharge into the atmosphere 250.00 or more tons of nitrogen oxides (NO_x) from the entire installation (All internal combustion diesel engine generators as specified in this permit) in any consecutive 12-month period. [Construction Permit 042002-011, Special Condition No. 1A.]

Monitoring/Recordkeeping:

The permittee shall maintain the monthly and the sum of the most recent consecutive 12-month records of the NO_x emissions from the internal combustion diesel engine generators (EP01 through EP14). Attachment A (Monthly NO_x Emissions Tracking Record), or equivalent forms, shall be used to demonstrate compliance with this requirement.

[Construction Permit 042002-011, Special Condition No. 1B.]

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, or AirComplianceReporting@dnr.mo.gov, no later than ten (10) days after the end of each month if the 12-month cumulative total records show that the source exceeded the Emission Limitation of this permit condition.
- 2) The permittee shall also report any deviations/exceedances of this permit condition using the semi-annual monitoring report and annual compliance certification as required by Section V of this permit.

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.

EP01 through EP03; EP07; and EP11 through EP14 - Internal Combustion Diesel Engine Generators (Equipment Put in Service: May 01, 2002)		
Emission Unit	Description	Manufacturer/Model #
EP01	Serial # L010313601, at Elm Street Substation 137.3 gal/hr, 17.80 MMBTU/hr, 2.0 MW (2,680 horsepower (HP)) Fuel type: diesel fuel oil	Cummins / Onan Model 2000.2.DQKC
EP02	Serial # K010307761, at Elm Street Substation 137.3 gal/hr, 17.80 MMBTU/hr, 2.0 MW Fuel type: diesel fuel oil	Cummins / Onan Model 2000.2.DQKC
EP03	Serial # L010313599, at Elm Street Substation 137.3 gal/hr, 17.80 MMBTU/hr, 2.0 MW Fuel type: diesel fuel oil	Cummins / Onan Model 2000.2.DQKC
EP07	Serial # L010313595, at Walton Street Substation 137.3 gal/hr, 17.80 MMBTU/hr, 2.0 MW Fuel type: diesel fuel oil	Cummins / Onan Model 2000.2.DQKC
EP11	Serial # K010307763, at Overall Road Substation 137.3 gal/hr, 17.80 MMBTU/hr, 2.0 MW Fuel type: diesel fuel oil	Cummins / Onan Model 2000.2.DQKC
EP12	Serial # K010307762, at Overall Road Substation 137.3 gal/hr, 17.80 MMBTU/hr, 2.0 MW Fuel type: diesel fuel oil	Cummins / Onan Model 2000.2.DQKC
EP13	Serial # K010307765, at Overall Road Substation 137.3 gal/hr, 17.80 MMBTU/hr, 2.0 MW Fuel type: diesel fuel oil	Cummins / Onan Model 2000.2.DQKC
EP14	Serial # K010307764, at Overall Road Substation 137.3 gal/hr, 17.80 MMBTU/hr, 2.0 MW Fuel type: diesel fuel oil	Cummins / Onan Model 2000.2.DQKC

**Permit Condition (EP01 through EP03) – 001;
Permit Condition (EP07) – 001; and
Permit Condition (EP11 through EP14) – 001**

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

Emission Limitation:

- 1) The permittee must comply with the requirements in Item 3 of Table 2d to Subpart ZZZZ of Part 63 which apply to the facility (listed below). [§63.6603(a)]
 - a) The permittee shall limit the concentration of carbon monoxide (CO) in the stationary RICE exhaust to 23 parts per million, volumetric dry (ppmvd) at 15 percent oxygen (O₂); or [Item 3a of Table 2d to Subpart ZZZZ]
 - b) The permittee shall reduce the CO emissions by 70 percent or more. [Item 3b of Table 2d to Subpart ZZZZ]
- 2) The permittee must use diesel fuel that meets the requirements in 40 CFR 80.510(b) for nonroad diesel fuel (listed below). [§63.6604(a)]
 - a) Except as otherwise specifically provided in 40 CFR 80 Subpart I, all nonroad (NR) diesel fuel is subject to the following per-gallon standards: [40 CFR 80.510(b)]
 - i) Sulfur content of 15 ppm maximum for NR diesel fuel. [40 CFR 80.510(b)(1)(i)]
 - ii) A minimum cetane index of 40 or a maximum aromatic content of 35 volume percent. [40 CFR 80.510(b)(2)(i) & (ii)]

Operating Limitations:

As stated in §63.6603(a), for each stationary RICE complying with the requirement to reduce CO emissions and using an oxidation catalyst, the permittee must meet the following operating limitation:

- 1) Maintain the permittee's catalyst so that the pressure drop across the catalyst does not change by more than 2 inches of water at 100 percent load plus or minus 10 percent from the pressure drop across the catalyst that was measured during the initial performance test; and or [Item 1a of Table 2b to Subpart ZZZZ]
- 2) Maintain the temperature of the permittee's stationary RICE exhaust so that the catalyst inlet temperature is greater than or equal to 450 °F and less than or equal to 1350 °F.¹ [Item 1b of Table 2b to Subpart ZZZZ]

General Compliance Requirements:

- 1) The permittee must be in compliance with the emission limitations and operating limitations in Subpart ZZZZ of 40 CFR Part 63 that apply to the permittee at all times. [§63.6605(a)]
- 2) At all times the permittee must operate and maintain the stationary RICEs, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require the permittee to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may

¹ The permittee can petition the Administrator pursuant to the requirements of 40 CFR 63.8(g) for a different temperature range.

include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. [§63.6605(b)]

Continuous Compliance Requirements:

- 1) The permittee must monitor and collect data according to §63.6635. [§63.6635(a)]
- 2) Except for monitor malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the permittee must monitor continuously at all times that the stationary RICE is operating. [§63.6635(b)]
- 3) The permittee may not use data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities in data averages and calculations used to report emission or operating levels. The permittee must, however, use all the valid data collected during all other periods. [§63.6635(c)]
- 4) The permittee shall demonstrate continuous compliance with each emission limitation and operating limitation according to the following methods: [§63.6640(a) and Item 10 of Table 6 of 40 CFR Part 63, Subpart ZZZZ]
 - a) Conducting performance tests every 8,760 hours or 3 years, whichever comes first, for CO, to demonstrate that the required CO percent reduction is achieved or that the permittee's emissions remain at or below the CO concentration limit;
 - b) Collecting the catalyst inlet temperature data according to §63.6625(b); and reducing these data to 4-hour rolling averages; and maintaining the 4-hour rolling averages within the operating limitations for the catalyst inlet temperature; and
 - c) Measuring the pressure drop across the catalyst once per month and demonstrating that the pressure drop across the catalyst is within the operating limitation established during the performance test.
- 5) The permittee shall conduct the required annual compliance demonstration according to the following requirements: [§63.6640(c)]
 - a) The compliance demonstration must consist of at least one test run. [§63.6640(c)(1)]
 - b) Each test run must be of at least 15 minute duration, except that each test conducted using the method in appendix A to this subpart must consist of at least one measurement cycle and include at least 2 minutes of test data phase measurement. [§63.6640(c)(2)]
 - c) The permittee must measure CO emissions using one of the CO measurement methods specified in Table 4 of this subpart, or using appendix A to this subpart. [§63.6640(c)(3)]
 - d) The permittee must measure O₂ using one of the O₂ measurement methods specified in Table 4 of Subpart ZZZZ of Part 63. Measurements to determine O₂ concentration must be made at the same time as the measurements for CO concentration. [§63.6640(c)(5)]
 - e) The permittee must measure CO emissions and O₂ emissions simultaneously at the inlet and outlet of the control device. [§63.6640(c)(6)]
- 6) If the results of the annual compliance demonstration show that the emissions exceed the levels specified in Emission Limitation 1) (tem 3a of Table 2d to Subpart ZZZZ), the stationary RICE must be shut down as soon as safely possible, and appropriate corrective action must be taken (e.g., repairs, catalyst cleaning, catalyst replacement). The stationary RICE must be retested within 7 days of being restarted and the emissions must meet the levels specified in Emission Limitation 1) (tem 3a of Table 2d to Subpart ZZZZ). If the retest shows that the emissions continue to exceed the specified levels, the stationary RICE must again be shut down as soon as safely possible, and the stationary RICE may not operate, except for purposes of startup and testing, until the permittee demonstrates through testing that the emissions do not exceed the levels specified in Emission Limitation 1) (tem 3a of Table 2d to Subpart ZZZZ). [§63.6640(c)(7)]

Monitoring:

- 1) If the permittee owns or operates an existing non-emergency CI engine greater than or equal to 300 HP that is not equipped with a closed crankcase ventilation system, the permittee must comply with either §63.6625(g)(1) or §63.6625(g)(2). The permittee must follow the manufacturer's specified maintenance requirements for operating and maintaining the open or closed crankcase ventilation systems and replacing the crankcase filters, or can request the Administrator to approve different maintenance requirements that are as protective as manufacturer requirements. [§63.6625(g)]
 - a) Install a closed crankcase ventilation system that prevents crankcase emissions from being emitted to the atmosphere, or [§63.6625(g)(1)]
 - b) Install an open crankcase filtration emission control system that reduces emissions from the crankcase by filtering the exhaust stream to remove oil mist, particulates, and metals. [§63.6625(g)(2)]
- 2) The permittee must minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the emission standards applicable to all times other than startup in table 2d to Subpart ZZZZ apply. [§63.6625(h)]

Notifications:

- 1) The permittee shall submit all of the notifications in §§63.7(b) and (c), 63.8(e), (f)(4) and (f)(6), 63.9(b) through (e), and (g) and (h) that apply by the dates specified. [§63.6645(a)]
- 2) The permittee shall submit a Notification of Intent to conduct a performance test at least 60 days before the performance test is scheduled to begin as required in §63.7(b)(1). [§63.6645(g)]
- 3) The permittee shall submit a Notification of Compliance Status according to §63.9(h)(2)(ii). [§63.6645(h)]
 - a) The Notification of Compliance Status shall include the performance test results and shall be submitted before the close of business on the 60th day following the completion of the performance test according to §63.10(d)(2).

Recordkeeping:

- 1) The permittee must keep the records described in paragraphs (a)(1) through (a)(5), (b)(1) through (b)(3) and (c) of §63.6655. [§63.6655(a)]
 - a) A copy of each notification and report that the permittee submitted to comply with Subpart ZZZZ of 40 CFR Part 63, including all documentation supporting any Initial Notification or Notification of Compliance Status that the permittee submitted, according to the requirement in §63.10(b)(2)(xiv). [§63.6655(a)(1)]
 - b) Records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment. [§63.6655(a)(2)]
 - c) Records of performance tests and performance evaluations as required in §63.10(b)(2)(viii). [§63.6655(a)(3)]
 - d) Records of all required maintenance performed on the air pollution control and monitoring equipment. [§63.6655(a)(4)]
 - e) Records of actions taken during periods of malfunction to minimize emissions in accordance with §63.6605(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. [§63.6655(a)(5)]
- 2) The permittee must keep the records required in Table 6 of Subpart ZZZZ of 40 CFR Part 63 to show continuous compliance with each emission or operating limitation that applies to the permittee. [§63.6655(d)]

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

Reporting:

- 1) The permittee must report each instance in which you did not meet each emission limitation or operating limitation in Table 2b and Table 2d to Subpart ZZZZ of 40 CFR Part 63 that apply to the permittee. These instances are deviations from the emission and operating limitations in Subpart ZZZZ of 40 CFR Part 63. These deviations must be reported according to the requirements in §63.6650. If you change your catalyst, you must reestablish the values of the operating parameters measured during the initial performance test. When you reestablish the values of your operating parameters, the permittee must also conduct a performance test to demonstrate that the permittee is meeting the required emission limitation applicable to the permittee's stationary RICE. [§63.6640(b)]
- 2) The permittee must also report each instance in which the permittee did not meet the requirements in Table 8 to Subpart ZZZZ of 40 CFR Part 63 *Applicability of General Provisions to Subpart ZZZZ* that apply to the permittee. [§63.6640(e)]
- 3) The permittee shall submit semi-annual and annual compliance reports. [§63.6650]
 - a) Each compliance report shall contain:
 - i) Company name and address.
 - ii) A statement by a responsible official, with that official's name, title, and signature, certifying the accuracy of the content of the report.
 - iii) Date of report and beginning and ending dates of the reporting period.
 - iv) If there were no deviations from any emission or operating limitations during the reporting period, the report shall contain a statement that there were no deviations from the operating limitations during the reporting period.
 - v) If the permittee had a malfunction during the reporting period, the compliance report shall contain the number, duration, and a brief description for each type of malfunction which occurred during the reporting period and which caused or may have caused any applicable emission or operating limitation to be exceeded. The report shall also include a description of actions taken by the permittee during the malfunction of the affected source to minimize emissions in accordance with §63.6605(b), including actions taken to correct a malfunction.
 - b) Pursuant to §63.6650(b)(5), the permittee shall submit semiannual reports according to the dates specified in Section V of this Permit:
 - i) Each subsequent compliance report shall cover the semi-annual reporting period from January 1 through June 30 or the semi-annual reporting period from July 1 through December 31. These reports shall be submitted in conjunction with the semi-annual Title V compliance reports required by Section V of this permit.
- 4) The permittee's compliance report shall contain the results of the annual compliance demonstration, if conducted during the reporting period.
 - a) The permittee shall report any deviations/exceedances of this permit condition using the semi-annual monitoring report and annual compliance certification to the Missouri Air Compliance Coordinator at EPA Region 7 with complimentary copies to the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by

Section V of this permit instead of according to the dates specified in paragraphs (b)(1) through (b)(4) of §63.6650.

**Permit Condition (EP01 through EP03) – 002;
Permit Condition (EP07) – 002; and
Permit Condition (EP11 through EP14) – 002**

10 CSR 10-6.260 Restriction of Emission of Sulfur Compounds²

10 CSR 10-6.060 Construction Permits Required, Construction Permit No. 042002-011

Emission Limitation:

The permittee shall not cause or permit the emission into the atmosphere of gases containing more than 500 ppmv of sulfur dioxide or more than 35 mg/m³ of sulfuric acid or sulfur trioxide or any combination of those gases averaged on any consecutive three-hour time period from the Emergency Generators.

[10 CSR 10-6.260(3)(A)2.]

Operational Limitation:³

The diesel fuel oil combusted in the Eight (8) engine generators shall have a sulfur content of 0.2 percent (%) by weight or less. Farmington Light and Power shall maintain records of the fuel supplier certifications or analytical testing documentation on site for not less than five (5) years for Missouri Department of Natural Resources' review. [Construction Permit 042002-011, Special Condition No. 2.]

Monitoring/Recordkeeping:

The permittee shall maintain records of the fuel type used verifying a sulfur content less than 0.2% by weight. Purchase receipts, analyzed samples or certifications that verify the fuel type as a grade level with a sulfur content less than 0.2% by weight will be acceptable.

Reporting:

The permittee shall report any deviations/exceedances of this permit condition using the annual compliance certification to the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, or AirComplianceReporting@dnr.mo.gov, as required by Section V of this permit.

² 10 CSR 10-6.260 was rescinded on November 30, 2015 and replaced by 10 CSR 10-6.261; however, the provisions of 10 CSR 10-6.260 currently remain in State Implementation Plan. The provisions of 10 CSR 10-6.260 will expire, once 10 CSR 10-6.261 is incorporated into the federally-approved SIP as a final EPA action.

³ Under 40 CFR Part 63, Subpart ZZZZ, the sulfur content limitation is more stringent than 10 CSR 10-6.260 or 10 CSR 10-6.261. The more stringent sulfur limitations apply.

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 are only excerpts from the regulation or code, and are provided for summary purposes only.

10 CSR 10-6.045 Open Burning Requirements

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

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

- 1) In the event of a malfunction, which results in excess emissions that exceed one hour, the permittee shall submit to the director within two business days, in writing, the following information:
 - a) Name and location of installation;
 - b) Name and telephone number of person responsible for the installation;
 - c) Name of the person who first discovered the malfunction and precise time and date that the malfunction was discovered.
 - d) Identity of the equipment causing the excess emissions;
 - e) Time and duration of the period of excess emissions;
 - f) Cause of the excess emissions;
 - g) Air pollutants involved;
 - h) 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 to the director in writing at least ten days prior to any maintenance, start-up or shutdown activity 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, notice shall be given as soon as practicable prior to the activity.
- 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. The permittee shall retain the most current operating permit issued to this installation on-site. The permittee shall immediately make such permit available to any Missouri Department of Natural Resources personnel upon request.

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

The permittee shall follow the procedures and requirements of 40 CFR Part 61, Subpart M for any activities occurring at this installation which would be subject to provisions for 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos.

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

- 1) The permittee shall submit a 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) 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.
- 3) 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.

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

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

10 CSR 10-6.150 Circumvention

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

10 CSR 10-6.165 Restriction of Emission of Odors

This requirement is a State Only permit requirement.

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

10 CSR 10-6.170

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

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

10 CSR 10-6.180 Measurement of Emissions of Air Contaminants

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

10 CSR 10-6.250 Asbestos Abatement Projects – Certification, Accreditation, and Business Exemption Requirements

This requirement is a State Only permit requirement.

The permittee shall conduct all asbestos abatement projects within the procedures established for certification and accreditation by 10 CSR 10-6.250. This rule requires individuals who work in asbestos

abatement projects to be certified by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires training providers who offer training for asbestos abatement occupations to be accredited by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires persons who hold exemption status from certain requirements of this rule to allow the department to monitor training provided to employees.

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 at an installation:
 - 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.

40 CFR Part 82 Protection of Stratospheric Ozone (Title VI)

- 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 40 CFR §82.106.
 - b) The placement of the required warning statement must comply with the requirements of 40 CFR §82.108.
 - c) The form of the label bearing the required warning statement must comply with the requirements of 40 CFR §82.110.
 - d) No person may modify, remove, or interfere with the required warning statement except as described in 40 CFR §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 of 40 CFR Part 82:

- a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices described in 40 CFR §82.156.
 - b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment described in 40 CFR §82.158.
 - c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR §82.161.
 - d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with the record keeping requirements of 40 CFR §82.166. ("MVAC-like" appliance as defined at 40 CFR §82.152).
 - e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to 40 CFR §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 40 CFR §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 contained in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.
 - 5) The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program. *Federal Only - 40 CFR Part 82.*

V. General Permit Requirements

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

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

10 CSR 10-6.065(6)(E)3.C Extension of Expired Permits

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. If a timely and complete application for a permit renewal is submitted, but the Air Pollution Control Program fails to take final action to issue or deny the renewal permit before the end of the term of this permit, this permit shall not expire until the renewal permit is issued or denied.

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

1) Record Keeping

- a) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
- b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any Missouri Department of Natural Resources' personnel upon request.

2) Reporting

- a) All reports shall be submitted to the Air Pollution Control Program, Compliance and Enforcement Section, P. O. Box 176, Jefferson City, MO 65102, or AirComplianceReporting@dnr.mo.gov.
- 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.
- c) Each report shall identify any deviations from emission limitations, monitoring, record keeping, reporting, or any other requirements of the permit, this includes deviations or Part 64 exceedances.
- d) Submit supplemental reports as required or as needed. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
 - i) Notice of any deviation resulting from an emergency (or upset) condition as defined in paragraph (6)(C)7.A of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two working days after the date on which the emission limitation is exceeded due to the emergency, if the permittee wishes to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and the permittee can identify the cause(s) of the emergency. The permitted installation must show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or requirements in the permit. The notice must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.

- ii) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.
- iii) Any other deviations identified in the permit as requiring more frequent reporting than the permittee's semiannual report shall be reported on the schedule specified in this permit.
- 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)

If the installation is required to develop and register a risk management plan pursuant to Section 112(R) of the Act, the permittee will verify that it has complied with the requirement to register the plan.

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

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

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

- 1) The permittee must comply with all of the terms and conditions of this permit. Any noncompliance with a permit condition constitutes a violation and is grounds for enforcement action, permit termination, permit revocation and re-issuance, permit modification or denial of a permit renewal application.
- 2) The permittee may not use as a defense in an enforcement action that it would have been necessary for the permittee to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit
- 3) The permit may be modified, revoked, reopened, reissued or terminated for cause. Except as provided for minor permit modifications, the filing of an application or request for a permit modification, revocation and reissuance, or termination, or the filing of a notification of planned changes or anticipated noncompliance, does not stay any permit condition.
- 4) This permit does not convey any property rights of any sort, nor grant any exclusive privilege.
- 5) The permittee shall furnish to the Air Pollution Control Program, upon receipt of a written request and within a reasonable time, any information that the Air Pollution Control Program reasonably may require to determine whether cause exists for modifying, reopening, reissuing or revoking the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the Air Pollution Control Program copies of records required to be kept by the permittee. The permittee may make a claim of confidentiality for any information or records submitted pursuant to 10 CSR 10-6.065(6)(C)1.

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

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

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

None.

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

- 1) Any document (including reports) required to be submitted under this permit shall contain a certification signed by the responsible official.
- 2) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized officials of the Missouri Department of Natural Resources, or their authorized agents, to perform the following (subject to the installation's right to seek confidential treatment of information submitted to, or obtained by, the Air Pollution Control Program):
 - a) Enter upon the premises where a permitted installation is located or an emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
 - b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - c) Inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
 - d) As authorized by the Missouri Air Conservation Law, Chapter 643, RSMo or the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the terms of this permit, and all applicable requirements as outlined in this permit.
- 3) All progress reports required under an applicable schedule of compliance shall be submitted semiannually (or more frequently if specified in the applicable requirement). These progress reports shall contain the following:
 - a) Dates for achieving the activities, milestones or compliance required in the schedule of compliance, and dates when these activities, milestones or compliance were achieved, and
 - b) An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measures adopted.
- 4) The permittee shall submit an annual certification that it is in compliance with all of the federally enforceable terms and conditions contained in this permit, including emissions limitations, standards, or work practices. These certifications shall be submitted annually by April 1st, unless the applicable requirement specifies more frequent submission. These certifications shall be submitted to EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, as well as the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov. All deviations and Part 64 exceedances and excursions must be included in the compliance certifications. The compliance certification shall include the following:
 - a) The identification of each term or condition of the permit that is the basis of the certification;
 - b) The current compliance status, as shown by monitoring data and other information reasonably available to the installation;
 - c) Whether compliance was continuous or intermittent;
 - d) The method(s) used for determining the compliance status of the installation, both currently and over the reporting period; and
 - e) Such other facts as the Air Pollution Control Program will require in order to determine the compliance status of this installation.

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

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

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

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

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

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

applicable requirement that establishes an emissions limit (including a work practice standard) or a federally enforceable emissions cap that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject.

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

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

- 1) Except as noted below, the permittee may make any change in its permitted operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Insignificant activities listed in the permit, but not otherwise addressed in or prohibited by this permit, shall not be considered to be constrained by this permit for purposes of the off-permit provisions of this section. Off-permit changes shall be subject to the following requirements and restrictions:
 - a) The change must meet all applicable requirements of the Act and may not violate any existing permit term or condition; the permittee may not change a permitted installation without a permit revision if this change is subject to any requirements under Title IV of the Act or is a Title I modification;
 - b) The permittee must provide contemporaneous written notice of the change to the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, or AirComplianceReporting@dnr.mo.gov, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219. This notice shall not be required for changes that are insignificant activities under 10 CSR 10-6.065(6)(B)3 of this rule. This written notice shall describe each change, including the date, any change in emissions, pollutants emitted and any applicable requirement that would apply as a result of the change.
 - c) The permittee shall keep a record describing all changes made at the installation that result in emissions of a regulated air pollutant subject to an applicable requirement and the emissions resulting from these changes; and
 - d) The permit shield shall not apply to these changes.

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

The application utilized in the preparation of this permit was signed by Gregory Beavers, City Administrator. 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 shall be reopened for cause if:

- 1) The Missouri Department of Natural Resources (MoDNR) 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) MoDNR 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) MoDNR or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

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

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

VI. Attachments

Attachments follow.

STATEMENT OF BASIS

INSTALLATION DESCRIPTION

Farmington Light & Power operates eight (8) sets of Cummins/Onan Model 2000.2.DQKC internal combustion diesel engine generators. The diesel engine generators are intended for standby electric power production in the event of a power transmission failure affecting the city of Farmington. The generators will also be used proactively for peak-shaving purposes and for sales to parties outside the Farmington Light and Power system.

All sets are located in St. Francois County. Three (3) sets are located at the Elm Street Substation, which has a legal description of NE ¼ of SW ¼, S31, T36N, R6E. One (1) generator is located at the Walton Street Substation, which has a legal description of SW ¼ of NW ¼, S36, T36N, R6E. Four (4) sets are located at the Overall Road Substation, which has a legal description of SW ¼ of NW ¼, S11, T35N, R5E. For the purposes of this permit, all substations are considered one installation.

The City of Farmington is responsible for all air emissions, for demonstrating compliance with all construction permit and operating permit conditions, for the EIQs, and for the annual emission fees.

This installation is not on the List of Named Installations found in 10 CSR 10-6.020(3)(B), Table 2. The installation is a major source for nitrogen oxides and carbon monoxide.

Updated Potential to Emit for the Installation and Reported Air Pollutant Emissions, tons per year

Pollutants	Potential to Emit ¹	Reported Actual Emissions				
		2016	2015	2014	2013	2012
Particulate Matter ≤ Ten Microns (PM ₁₀)	35.74	0.02	0.01	0.02	0.03	0.04
Particulate Matter ≤ 2.5 Microns (PM _{2.5})	29.88	0.02	0.01	0.02	0.03	0.04
Sulfur Oxides (SO _x)	0.94	0.07	0.05	0.07	0.00	0.00
Nitrogen Oxides (NO _x)	250.00	0.60	0.42	0.60	1.19	1.42
Volatile Organic Compounds (VOC)	49.90	0.09	0.06	0.09	0.19	0.22
Carbon Monoxide (CO)	530.16	0.25	0.18	0.25	0.50	0.06
Hazardous Air Pollutants (HAP's)	0.93	0.00	0.00	0.00	0.00	0.00
Ammonia (NH ₃)	6.24	0.00	0.00	0.00	0.01	0.01

Note: ¹ Each emission unit was evaluated at 8,760 hours of uncontrolled annual operation unless otherwise noted.

- Emissions of NO_x limited to less 250 tons per year. [Construction Permit No. 042002-011

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 January 4, 2016;
- 2) 2016 Emissions Inventory Questionnaire, received March 8, 2017;
- 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 Number 042002-011, Issued April 05, 2002; and
- 5) New Source Review Permit Application - Project Number: 2003-05-064, Amendment to Construction Permit Number 042002-011.

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

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

None

Other Air Regulations Determined Not to Apply to the Operating Permit

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

10 CSR 10-6.100, *Alternate Emission Limits*.

This rule applies to installations that emit volatile organic compounds (VOC) in the ozone nonattainment area. This rule is not applicable because the installation is in an ozone attainment area.

Construction Permit History

This operating permit makes no revisions to construction permits for this installation.

New Source Performance Standards (NSPS) Applicability

- 1) 40 CFR Part 60, Subparts K - *Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction Or Modification Commenced After June 11, 1973, and Prior to May 19, 1978.*

This subpart applies to petroleum liquids storage vessels with a capacity of more than 40,000 gallons (151,412 liters) that commence construction or modification:

- After Mar 8, 1974 (If > 40,000 and < 65,000 gallons)
- After June 11, 1973 and before May 19, 1978 (If < 65,000 gallons)

40 CFR Part 60, Subpart Ka - *Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction Or Modification Commenced After May 19, 1978, and Prior to July 23, 1984.*

This subpart applies to petroleum liquids storage vessels with a capacity of more than 40,000 gallons (151,412 liters) that commence construction after May 18, 1978 and prior to July 23, 1984.

The installation does not have any petroleum storage vessels as defined in these subparts (K or Ka) that are subject to these regulations.

- 2) 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 subpart applies to: storage vessels with a capacity \geq 75 cubic meters (m³) (19,812.90 gal) used to store volatile organic liquids (VOL), which commenced construction, modification, or reconstruction after July 23, 1984. The diesel fuel storage tanks are not large enough for this regulation to apply.

- 3) 40 CFR 60 Subpart IIII - *Standards of Performance for Stationary Compression Ignition Internal Combustion Engines.*
This subpart is applicable to owners and operators of stationary compression ignition (CI) internal combustion engines (ICE) and other persons who construct, reconstruct, or modify an engine after July 11, 2005. A compression ignition is a type of stationary internal combustion engine that is not a spark ignition engine.

This rule is not applicable because the stationary compression ignition engines were installed in 2002 which is prior to the applicability date of July 11, 2005.

Maximum Achievable Control Technology (MACT) Applicability

40 CFR part 63, Subpart ZZZZ - *National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE).*

Subpart ZZZZ establishes national emission limitations and operating limitations for hazardous air pollutants (HAPs) emitted from stationary reciprocating internal combustion engines (RICE) located at major and area sources of HAP emissions.

The RICE rule Applies to:

- Engines greater than 500 Horsepower (HP) at major source of HAP:
 - Existing engines if constructed before December 19, 2002
 - New engines if constructed on or after December 19, 2002
 - Reconstructed engines if reconstruction began on or after December 19, 2002
- Engines less than or equal 500 HP located at major source of HAP and engines of all horsepower located at an area source of HAP:
 - Existing engines if constructed before June 12, 2006
 - New engines if constructed on or after June 12, 2006
 - Reconstructed engines if reconstruction began on or after June 12, 2006

Farmington Light & Power is an area source of hazardous air pollutants (HAPs). The installation operates stationary compression ignition reciprocating internal combustion engines (CI RICE) constructed/reconstructed before June 12, 2006 (existing). These CI engines are subject to the provision of this rule for existing non-emergency CI engines, located at an area source of HAPs.

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

40 CFR Part 61 Subpart M – *National Emission Standard for Asbestos*.

The installation is not subject to any NESHAP standard with the exception of Subpart M - National Emission Standard for Asbestos. The installation is potentially subject to Subpart M. If the installation conducts any demolition or renovation projects to a building(s) containing asbestos, they must determine applicability with the following NESHAP regulations:

- Demolition and Renovation - 40 CFR 61.145
- Waste Disposal for Manufacturing, Fabricating, Demolition, Renovation, and Spraying - 40 CFR 61.150

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.

The pollutant specific emission units that use a control device to achieve compliance with 40 CFR Part 63, Subpart ZZZZ, one of the 112 standards promulgated after November 15, 1990, are excluded from the CAM rule. Therefore the installation is not subject to 40 CFR Part 64.

Greenhouse Gas Emissions

Note that this source is subject to the Greenhouse Gas Reporting Rule. However, the preamble of the GHG Reporting Rule clarifies that Part 98 requirements do not have to be incorporated in Part 70 permits operating permits at this time. In addition, Missouri regulations do not require the installation to report CO₂ emissions in their Missouri Emissions Inventory Questionnaire; therefore, the installation's CO₂ emissions were not included within this permit. The applicant is required to report the data directly to EPA. The public may obtain CO₂ emissions data for this installation by visiting <http://epa.gov/ghgreporting/ghgdata/reportingdatasets.html>.

Other Regulatory Determinations

- 1) 10 CSR 10-6.260, *Restriction of Emissions of Sulfur Compounds* and 10 CSR 10-6.261, *Control of Sulfur Dioxide Emissions*.

10 CSR 10-6.260 was rescinded on November 30, 2015 and replaced by 10 CSR 10-6.261; however, the provisions of 10 CSR 10-6.260 currently remain in State Implementation Plan. The provisions of 10 CSR 10-6.260 will expire, once 10 CSR 10-6.261 is incorporated into the federally-approved SIP as a final EPA action.

- a) 10 CSR 10-6.260(3)(A)2. applies to all "new" generators at Farmington Light & Power that use fuel oil. There are no "existing" generators at Farmington Light & Power. (Existing sources in the outstate Missouri area as defined in 10 CSR 10-6.020: any equipment, machine, device, article, contrivance, or installation that is existing, installed, or under construction on February 24, 1971.)

Farmington Light & Power is in compliance with the SO₂ emissions limit of 500 ppmv averaged on any consecutive 3-hour period and SO₃/H₂SO₄ limit of 35 mg/m³ averaged on any

consecutive 3-hour period for fuel oil of 10 CSR 10-6.260(3)(A)2 by using low sulfur fuel oil (i.e., ≤ 15 ppmv sulfur content) as required by 40 CFR part 63, Subpart ZZZZ.

- b) 10 CSR 10-6.261 is not applicable to the installation for the following reason:
According to 10 CSR 10-6.261(1)(C), emission units subject to a more restrictive SO₂ emission limit or more restrictive fuel sulfur content limit under any federally enforceable are exempt from the requirements of these rules. The generators are limited to burn fuel oil with sulfur content of 15 parts per million (ppm) maximum [§80.510(b)(1)(i)]; therefore, the generators are exempt from the requirements of 10 CSR 10-6.261.
- 2) Other regulations such as 10 CSR 10-6.400, *Restriction of Particulate Matter from Industrial Processes*, 10 CSR 10-6.405, *Maximum Allowable Emissions of Particulate Matter from Fuel Burning Equipment Used for Indirect Heating* and 10 CSR 10-6.220, *Restriction of Emission of Visible Air Contaminants* were not included in the this Part 70 Operating Permit for the following reasons:
- a) 10 CSR 10-6.020, *Definitions and Common Reference Tables*, explains that process weight, i.e., process weight rate used in 10 CSR 10-6.400 equations to calculate the PM allowable emission rate, means the total weight of all materials introduced into a source operation, including solid fuels, but excluding liquids and gases used solely as fuels and excluding air introduced for purposes of combustion. Therefore, 10 CSR 10-6.400 is not included in the operating permit.
- b) 10 CSR 10-6.405 applies only to indirect heating units and these internal combustion engines are not considered indirect heating units therefore, this regulation is not included in the operating permit.
- c) 10 CSR 10-6.220 does not apply to the internal combustion engines per subsection (1)(A) of this regulation. Therefore, this regulation is not included in the operating permit.

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

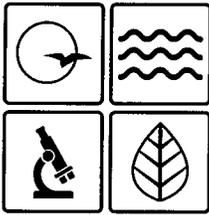
Any regulation which is not specifically listed in either the Operating Permit or in the above Statement of Basis does not appear, based on this review, to be an applicable requirement for this installation for one or more of the following reasons:

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

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

Response to Public Comments

The draft Part 70 Operating Permit for Farmington Light & Power was placed on public notice as of December 8, 2017 for a 30-day comment period. The public notice was published on the Department of Natural Resources' Air Pollution Control Program's web page at: <http://dnr.mo.gov/env/apcp/permit-public-notices.htm> on Friday, December 8, 2017. The Air Pollution Control Program did not receive any public comments during the 30-day comment period.



Missouri Department of dnr.mo.gov

NATURAL RESOURCES

Eric R. Greitens, Governor

Carol S. Comer, Director

MAR 09 2018

Mr. Gregory Beavers
Farmington Light & Power
110 West Columbia Street
Farmington, MO 63640-1792

Re: Farmington Light & Power, 187-0075
Permit Number: OP2018-021

Dear Mr. Beavers:

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

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

You may appeal this permit to the Administrative Hearing Commission (AHC), P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.078.16 and 621.250.3. If you choose to appeal, you must file a petition with the AHC within thirty days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If any such petition is sent by registered mail or certified mail, it will be deemed filed on the date it is mailed. If it is sent by any method other than registered mail or certified mail, it will be deemed filed on the date it is received by the AHC.

If you have any questions or need additional information regarding this permit, please do not hesitate to contact Berhanu Getahun at the St. Louis Regional Office, 7545 S. Lindbergh, Suite 210, St. Louis, MO 63125, or by telephone at (314) 416-2960. You may also contact me with the Department's Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102, or by telephone at (573) 751-4817.

Sincerely,

AIR POLLUTION CONTROL PROGRAM


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

MJS:bgj

Enclosures

c: PAMS File: 2016-01-002

