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NATURAL RESOURCES

Eric R. Greitens, Governor

Carol S. Comer, Director

JUN 22 2017

Mr. Steve Courtney
Environmental Services
KCP&L – GMO, Sibley Generating Station
33200 E. Johnson Road
Sibley, MO 64141

RE: Part 70 Operating Permit Significant Modification - Permit Number: OP2012-056A
Project Number: 2016-05-074; Installation Number: 095-0031

Dear Mr. Courtney:

Part 70 Operating Permit OP2012-056 is being modified in response to your May 17, 2016 request. You requested updating the operating permit to include the conditions of Construction Permit 042016-002 which was issued on April 1, 2016 and also to remove the requirements of 40 CFR Part 64 Compliance Assurance Monitoring (CAM).

Units 1, 2 and 3 are subject to 40 CFR Part 63 Subpart UUUUU and use PM CEMS, therefore CAM is no longer applicable per the exemptions in §64.2(b)(i) and (vi). 10 CSR 10-6.405 *Restriction of PM Emissions From Fuel Burning Equipment Used For Indirect Heating* remains applicable to the installation, however the 0.12 lb/MMBtu filterable PM annual average limit is less stringent than the 0.03 lb/MMBtu filterable PM 30-day rolling average limit for Units 1, 2 and 3 in MACT UUUUU, therefore compliance with MACT UUUUU ensures compliance with 10 CSR 10-6.405. Furthermore 10 CSR 10-6.220 *Restriction of Emission of Visible Air Contaminants* is no longer applicable to Units 1, 2, and 3 per the exemption in 10 CSR 10-6.220(1)(N).

Part 70 Operating Permit OP2012-056 is revised by replacing Permit Condition (EP5A through EP5C)-002 with the revised Permit Condition (EP5A through EP5C)-002, adding new Permit Condition (EP-5A through EP5C)-007 and Attachment J, and removing Permit Condition (EP5A through EP5C)-003.

If you were adversely affected by this permit decision, you may be entitled to pursue an appeal before the administrative hearing commission pursuant to §§621.250 and 643.075.6 RSMo. To appeal, you must file a petition with the administrative hearing commission within 30 days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If any



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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, P.O. Box 1557, Jefferson City, Missouri 65102, phone: 573-751-2422, fax: 573-751-5018, website: www.aa.mo.gov/ahc.

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

Sincerely,

AIR POLLUTION CONTROL PROGRAM

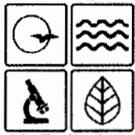


Kendall B. Hale
Permits Section Chief

KBH;jwj

Enclosures

c: Kansas City Regional Office
PAMS File: 2016-05-074



MISSOURI
DEPARTMENT OF
NATURAL RESOURCES
Air Pollution Control Program

PART 70 PERMIT TO OPERATE

Operating Permit Number: OP2012-056
Installation Name: KCP&L-Greater Missouri Operating Company
(GMO), Sibley Generating Station
Installation ID: 095-0031
Project Number: 2016-05-074

Description of Part 70 Significant Modification:

KCP&L- Greater Missouri Operating Company (GMO), Sibley Generating Station submitted a request dated May 17, 2016 to include the conditions of Construction Permit 042016-002 which was issued on April 1, 2016 and also to remove the requirements of 40 CFR Part 64 Compliance Assurance Monitoring (CAM). The operating permit is revised by replacing Permit Condition (EP5A through EP5C)-002 with the revised Permit Condition (EP5A through EP5C)-002, adding new Permit Condition (EP-5A through EP5C)-007 and Attachment J, and removing Permit Condition (EP5A through EP5C)-003.

PERMIT CONDITION (EP5A through EP5C)-002

10 CSR 10-6.405 Restriction of Particulate Matter Emissions From Fuel Burning Equipment Used For Indirect Heating
40 CFR Part 64 Compliance Assurance Monitoring

Emission Limitation

The permittee shall not emit particulate matter in excess of 0.12 pounds per million BTU's of heat input.

Monitoring/Recordkeeping/Reporting:

Compliance with Permit Condition (EP05A through EP05C)-001 ensures compliance with the emission limitation in 10 CSR 10-6.405, therefore no monitoring, recordkeeping or reporting beyond that included in Permit Condition (EP05A through EP05C)-001 is required.

PERMIT CONDITION (EP5A through EP5C)-007

10 CSR 10-6.060 Construction Permits Required
Construction Permit 042016-002, Issued April 1, 2016

Operational Limitations:

1. Special Condition 1.A: The permittee shall not inject more than 1,123 tons of brominated activated carbon (BAC) into the flue gas of Unit 3 during any consecutive 12-month rolling period.
2. Special Condition 1.B: The permittee shall not apply more than 4,336 gallons of aqueous CaBr₂ solution to the coal being combusted by Units 1 and 2 combined during any consecutive 12-month rolling period.

Monitoring:

Special Condition 1.C: Attachment J or an equivalent form approved by the Air Pollution Control Program shall be used to demonstrate compliance with Special Conditions 1.A and 1.B.

Recordkeeping/Reporting:

1. Special Condition 2.A: The permittee shall maintain all records for not less than five years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request. These records shall include SDS for all materials used.
2. Special Condition 2.B: The permittee 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 shows an exceedance of the operational limitations.
3. The permittee shall report any deviations from the emission limitations, operational limitation, recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V of this permit.

Response to Public Comments

The draft Part 70 Operating Permit Significant Modification for KCP&L – GMO, Sibley Generating Station (095-0031) was placed on public notice as of March 31, 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://www.dnr.mo.gov/env/apcp/PermitPublicNotices.htm>. On March 17, 2017 the Air Pollution Control Program received comments from Mark Smith, EPA Region 7. The comments are addressed below in the order in which they appear within the letter.

Comment #1: On September 1, 2016, five months after the issuance of construction permit 042016-002, MDNR issued KCPL – Sibley Permit to Construct #092016-001 authorizing the installation of two propane fired boilers and propane storage tanks. This permit contains several special conditions; however the construction permit does not require KCPL – Sibley to modify their operating permit. However, EPA believes that MDNR is modifying the existing operating permit to incorporate special conditions from Permit to Construct #042016-002, then the special conditions of Permit to Construct #092016-001 should also be incorporated into the operating permit. Therefore EPA recommends MDNR incorporate the applicable special conditions from Permit to Construct #092016-001 into this major modification of operating permit OP 2012-056.

Response to Comment: Permit to Construct #092016-001 states that submittal of an application to amend the operating permit is required within one year of the new equipment startup. The permittee is not required to submit an application to modify the operating permit at this time and has made no request to do so. Waiting until after equipment startup to modify the operating permit allows the permittee to complete the required initial performance testing on the new units so that these conditions will not have to be included in the operating permit modification. The timeframe for modifying the operating permit will likely fall within the review of the operating permit renewal as well therefore the special conditions of Permit to Construct #092016-001 will not be included in this significant modification at this time.