



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: OP2009-009A
Expiration Date: March 22, 2014
Installation ID: 165-0007
Project Number: 2009-10-017

Installation Name and Address

Kansas City Power and Light –
Iatan Generating Station
20250 Highway 45 - North
Weston, MO 64098
Platte County

Parent Company's Name and Address

Great Plains Energy, Inc.
P.O. Box 418689
1200 Main Street
Kansas City, MO 64141

Installation Description:

Iatan Generating Station – Unit 1 is a dry bottom, wall fired boiler used for electricity generation. Subbituminous coal is the primary fuel and No. 2 fuel oil is used for light-off, start-up and flame stabilization. The emission control equipment includes low NOx burners, SCR, over-fired air, wet scrubber and a baghouse. The installation also has coal handling, combustion by-products handling, haul roads, gasoline storage tank, degreasing units, limestone handling, and an emergency fire pump. This Significant Modification to the original operating permit is in response to a construction permit authorizing the installation of a new Unit 2 pulverized coal boiler and associated pollution control equipment, emergency fire pump, and a combustion by-product landfill.

MAR 28 2011

Effective Date

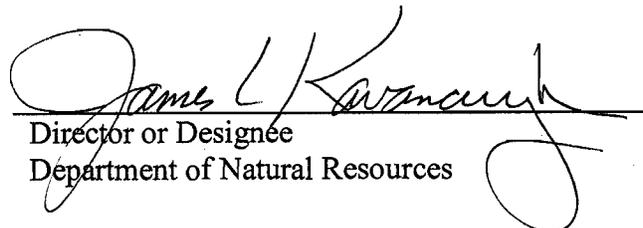

Director or Designee
Department of Natural Resources

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I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION

Iatan Generating Station – Unit 1 is a dry bottom, wall fired boiler used for electricity generation. Subbituminous coal is the primary fuel and No. 2 fuel oil is used for light-off, start-up and flame stabilization. The emission control equipment includes low NOx burners, SCR, over-fired air, wet scrubber and a baghouse. The installation also has coal handling, combustion by-products handling, haul roads, gasoline storage tank, degreasing units, limestone handling, and an emergency fire pump. This Significant Modification to the original operating permit is in response to a construction permit authorizing the installation of a new Unit 2 pulverized coal boiler and associated pollution control equipment, emergency fire pump, and a combustion by-product landfill.

Reported Air Pollutant Emissions, tons per year							
Year	Particulate Matter ≤ Ten Microns (PM-10)	Sulfur Oxides (SO _x)	Nitrogen Oxides (NO _x)	Volatile Organic Compounds (VOC)	Carbon Monoxide (CO)	Lead (Pb)	Hazardous Air Pollutants (HAPs)
2009	195.53	1923.40	151.90	1.29	449.83	0.01	5.01
2008	534.81	15076.71	6922.12	75.42	628.83	0.53	80.20
2007	531.00	14293.2	6675.49	74.84	622.83	0.52	73.33
2006	379.84	17518	7652.00	89.910	746.85	0.26	81.39
2005	353.81	19217	8122.40	86.770	723.84	0.25	86.70

EMISSION UNITS WITH LIMITATIONS

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

Emission Unit #	Description of Emission Unit	Emission Point
EU0010	Pulverized Coal Fired Boiler, Unit 1	EP-06
EU0020	Pulverized Coal Fired Boiler, Unit 2	EP-30
EU0030	Coal Train Unloading	EP-01
EU0040	Coal Transfer and Conveying	EP-03
EU0050	Coal Crushing and Transfer	EP-04
EU0060	Coal Storage Pile	EP-02
EU0070	Coal Storage Silos	none
EU0080	Fly Ash Handling	EP-08
EU0090	Fly Ash Silo	EP-07
EU0100	Haul Roads	EP-09 and EP-10
EU0110	Gasoline Storage Tank	EP-36
EU0120	Degreasing Units	EP-20, 21, and 49
EU0130	Limestone Handling	EP-22
EU0140	Emergency Fire Pump	none
EU0150	Cooling Towers	EP-29
EU0160	New Emergency Generator	EP-32
EU0170	Existing Emergency Generator	EP-33

EMISSION UNITS WITHOUT LIMITATIONS

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

Description of Emission Source

Insignificant Activities:

- Diesel Fuel Storage Tanks
- Portable Space Heaters
- Used Oil Storage Tank
- Lime Silo Baghouse Vent at Water Treatment Building
- Homelite Portable Generator
- Mobile Emergency Generator
- Portable Gasoline Powered Sump Pumps Diesel Powered Lincoln SA-200 Arc Welder
- Portable Gasoline Powered Pumps (2)
- Limestone Storage Pile (fugitive)
- Bottom Ash Storage Pile (fugitive)
- Gypsum Storage Pile (fugitive)

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.

PERMIT CONDITION PW001

10 CSR 10-6.060 Construction Permits Required
Construction Permit 012006-019D, October 27, 2008

Superseding Conditions:

The conditions of Construction Permit 012006-019D supersede all special conditions found in construction permits previously issued by the Air Pollution Control Program. [Special Condition 23]

Operational Limitation:

- 1) Bin vent filters, cyclones and other particulate control devices shall be operated in accordance with manufacturer's recommendations and shall receive periodic inspection and maintenance to ensure proper operation. [Special Condition 9D]
- 2) Restriction of Public Access – Fencing or Physical Barrier to Restrict Public Access to Property: Kansas City Power and Light Company shall preclude public access to property that is considered within the non-ambient air zone with respect to the air quality impact analysis conducted for this permit. Installation and maintenance of a fence or other physical barrier shall be the means to preclude public access. Figure 4 of the August 6, 2008 Ambient Air Quality Impact Analysis Memorandum depicts the property boundary (precluded areas). Kansas City Power and Light Company shall complete construction of the physical barrier prior to commencing operation of the modified Unit 1 Boiler. [Special Condition 11]

Other Limitations:

- 1) This project will create excess netting emissions reductions totaling approximately 3,500 tons of NO_x and 12,200 tons of SO₂. Kansas City Power and Light Company shall not use these excess emission reduction credits for SO₂ and NO_x to avoid the applicability of BACT in any future permit applications to construct additional units at the Iatan Station or to modify Iatan Units 1 or 2 during the contemporaneous period (2001 to 2010). [Special Condition 18]
- 2) In the event that there are conflicting requirements or specifications when comparing state and federal regulations and laws, the contents of the amended permit application and the conditions of this permit, the most stringent requirements or specifications shall apply. [Special Condition 19]

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.

EU0010 – Boiler #1			
Emission Unit	Description	Manufacturer/Model #	2006 EIQ Reference #
EU0010	Boiler 1 – 7,800 MMBtu/hr; Primary Fuel: Subbituminous Coal; Start-Up and Secondary Fuel: No. 2 Fuel Oil; Control Devices: Low NOx Burners, Over-fire Air, SCR, Wet Scrubber and Baghouse; Modified 2008	Babcock & Wilcox	EP-06

PERMIT CONDITION EU0010-001
 10 CSR 10-6.060 Construction Permits Required
 Construction Permit 012006-019D, Issued October 27, 2008

Emission Limitations:

- 1) The following emission limits apply to the stack that is associated with the modified Unit 1 pulverized coal boiler and associated pollution control equipment. The permittee shall not exceed the following emission limits: [Special Conditions 2E1 through 2E14]
 - a) Nitrogen Oxides (NO_x) - 0.09 pounds per MMBtu, based on a thirty-day rolling average.
 - b) Sulfur Dioxide (SO₂) - 0.07 pounds per MMBtu, based on a thirty day rolling average.
 - c) SO₂ – 4,212 pounds per hour, based on a 24-hour rolling average.
 - d) SO₂ – 6,630 pounds per hour, based on a three-hour block average.
 - e) Particulate Matter Less Than Ten Microns in Aerodynamic diameter (PM₁₀) – 0.0244 pounds per MMBtu, based on a thirty day rolling average. This limit includes both filterable and condensable particulate matter.
 - f) Filterable PM₁₀ – 0.014 pounds per MMBtu, based on a three-hour rolling average.
 - g) Filterable Particulate Matter – 0.015 pounds per MMBtu, based on a three-hour rolling average.
 - h) Opacity – fifteen percent (six-minute average) excluding periods of start-up and shutdown, six-minute period per hour of not more than 27 percent.
 - i) Carbon Monoxide (CO) - 0.16 pounds per MMBtu, based on a thirty day rolling average.
 - j) Volatile Organic Compounds (VOC) – 0.0036 pounds per MMBtu, test method average.
 - k) Vapor Phase Mercury – The permittee shall comply with the following three (3) limits:
 - i) 39 X 10⁻⁶ pounds per gross MWh, based on a rolling annual average;
 - ii) The federally established emission limitation applicable to this unit; and,
 - iii) 210 pounds per year for Unit 1 and Unit 2, based on a rolling annual average.
 - l) Sulfuric Acid Mist (H₂SO₄) – 5.2 x 10⁻³ pounds per MMBtu, test method average.
 - m) Lead (Pb) – 5.93 X 10⁻⁶ pounds per MMBtu, test method average.
 - n) Hydrogen Fluoride (HF) – 33.15 pounds per hour, test method average.
- 2) These emission limits (except opacity limit) include periods of start-up, shutdown and malfunction; see also 10 CSR 6.050 and the definitions in 10 CSR 10-6.020.

Operational Requirements:

- 1) The Unit 1 Boiler shall utilize a low-sulfur (less than 1.4 pounds SO₂ per MMBtu generated upon combustion) subbituminous coal as the primary fuel. [Special Condition 2A]
- 2) The heat input to Unit 1 shall not exceed 7,800 MMBtu per hour. [Special Condition 2A]
- 3) No. 2 fuel oil with a sulfur content of less than 0.05 percent shall be used for light off, startup and flame stabilization. [Special Condition 2A]
- 4) No other fuels shall be used in Unit 1 without receiving prior written authorization from the Air Pollution Control Program. [Special Condition 2A]
- 5) The Unit 1 boiler heat input rate shall not exceed 7,800 MMBTU/hr. [Special Condition 20]
- 6) The purpose of Condition 5 above is to determine a more accurate heat input measurement than the method in use as of January 2006. The permittee may propose alternate methods for making this compliance demonstration. Prior to using any alternate methods the permittee must receive written approval from the Director of the Air Pollution Control Program. Heat input rate compliance demonstrations shall be accomplished using coal mass feed rate data, oil volumetric flow rate data and heating value analyses of the coal and oil. The higher heating value for coal used in the heat input rate compliance calculations shall be at least 95 percent of the thirty-day rolling average of as-received coal higher heating values. The higher heating value for oil used in the heat input rate compliance calculations shall be the results of the most recent analysis, or 135,000 Btu per gallon, whichever is greater. The 95th percentile heat input rate for any given 24-hour period shall not exceed the rates specified in Operational Limitations of Special Conditions 2A and 20 of Construction Permit 012006-019D (Operational Requirements 1, 2, 3, 4 and 5 above). The 95th percentile heat input rate shall be calculated at least once per hour and shall include data from the 24-hour period that just passed. [Special Condition 21]

Emission Control Operation Requirements:

- 1) The permittee shall install and effectively operate a Selective Catalytic Reduction (SCR) unit for the Unit 1 Boiler. The permittee must maintain the design specifications and an operations and maintenance manual for the SCR unit on site which will include the following:
 - a) Catalyst type, volume and pitch;
 - b) Catalyst vendor;
 - c) Catalyst bed elevation and layout drawings;
 - d) Piping and instrumentation diagrams for the catalyst beds and the ammonia injection system;
 - e) Process flow diagrams;
 - f) Anticipated inlet NO_x rate;
 - g) Anticipated ammonia injection rate;
 - h) Anticipated ammonia slip;
 - i) Anticipated flue gas temperatures through the SCR unit;
 - j) A description of catalyst monitoring and replacement procedures;
 - k) A description of ammonia and NO_x monitoring equipment and procedures; and
 - l) A description of equipment and procedures that will be utilized to prevent or minimize masking, plugging, poisoning, accumulation of sulfates or other deterioration in catalyst performance. [Modified Special Condition 2B]
- 2) The permittee shall install and effectively operate a flue gas desulfurization system (wet scrubber) for the Unit 1 Boiler. The permittee shall maintain on site the design specifications, process flow diagrams, elevation and layout drawings and an operations and maintenance manual for the flue gas desulfurization system. [Modified Special Condition 2C]

- 3) The permittee shall install and effectively operate a fabric filtration system (baghouse(s)) for the Unit 1 Boiler. The permittee shall maintain on site the design specifications, process flow diagrams, elevation and layout drawings and an operations and maintenance manual for the fabric filtration system. [Modified Special Condition 2D]
- 4) The permittee shall operate the baghouse(s) in accordance with the following:
 - a) All baghouses shall be operated and maintained in accordance with the manufacturer's specifications. [Special Condition 9A]
 - b) Each baghouse shall be equipped with a gauge that indicates pressure drop across the control device. Pressure gauges or a visual display of the pressure data (i.e., monitor or chart) shall be located such that the Department of Natural Resources' personnel may easily observe them during a site visit. [Special Condition 9A]
 - c) Replacement filters for the baghouses shall be kept on hand at all times. The bags shall be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance). [Special Condition 9A]
 - d) The permittee shall monitor and record the operating pressure drop across the baghouses at least once every 24 hours. The operating pressure drop shall be maintained within the design conditions specified by the manufacturer (see Attachment F). [Special Condition 9B]
 - e) The permittee shall maintain an operating and maintenance log for the baghouses which shall include the following: [Special Condition 9C]
 - i) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
 - ii) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.
- 5) The permittee shall maintain the pulverized coal boiler and associated air pollution control equipment in accordance with good air pollution control practices to assure proper functioning of the equipment and minimize malfunctions. [Special Condition 2F]

Monitoring:

- 1) The permittee shall install, certify, operate, calibrate, test and maintain CEMS for NO_x, SO₂, CO and any necessary auxiliary monitoring equipment in accordance with all applicable regulations. If there are conflicting regulatory requirements, the more stringent shall apply. [Special Condition 13A]
- 2) The permittee shall install, certify, operate, calibrate, test and maintain COMS for opacity in accordance with all applicable regulations. If there are conflicting regulatory requirements, the more stringent shall apply. [Special Condition 13B]
- 3) The permittee shall install, certify, operate, calibrate, test and maintain CEMS for vapor phase mercury in accordance with the Environmental Protection Agency's regulations published in the May 18, 2005 Federal Register. See 40 CFR Part 75, Appendices A, B and K. [Special Condition 13C]
- 4) The permittee shall install, certify, operate, correlate and maintain CEMS for particulate matter in accordance with the performance specification and quality assurance procedures of 40 CFR Part 60, Appendix B, Performance Specification 11 and Appendix F, Procedure 2. [Special Condition 13D]
- 5) The permittee shall install and operate a data acquisition and handling system to calculate emissions in terms of the emission limitations specified in this permit. [Special Condition 13E]
- 6) Compliance with the NO_x, SO₂ and CO emission limits for the Unit 1 Boiler shall be demonstrated through the use of the required CEMS. [Special Condition 13F]
- 7) Compliance with the opacity limit for the Unit 1 Boiler shall be demonstrated through the use of the required COMS. [Special Condition 13G]

- 8) Compliance with the PM_{10} , filterable PM_{10} and filterable particulate matter emission limits for the Unit 1 Boiler shall be demonstrated through the use of the required CEMS, however data gathered from the CEMS shall be adjusted as follows: [Special Condition 13H]

$$PM_{10} = PM_{CEM} + PM_{CONDENSIBLE} - PM_{>10}$$
$$\text{Filterable } PM_{10} = PM_{CEM} - PM_{>10}$$

Where,

PM_{CEM} = reported value from the particulate matter CEMS.
= Filterable particulate matter.

$PM_{CONDENSIBLE}$ = condensible particulate matter, from the stack test data.

$PM_{>10}$ = mass fraction of particulate matter greater than ten microns in diameter (from stack test data) multiplied by PM_{CEM} .

- 9) Compliance with the mercury emission limits for the pulverized coal boilers shall be demonstrated through use of the required CEMS. [Special Condition 13I]

Testing Requirements:

With regard to the Unit 1 Boiler, stack testing for VOC, sulfuric acid mist, lead, hydrogen fluoride, condensable particulate matter and filterable PM_{10} shall be repeated at least once every two years and the results shall be reported to the Air Pollution Control Program. The date on which these stack tests are conducted must be pre-arranged with the Air Pollution Control Program a minimum of thirty days prior to the proposed test so that a pretest meeting may be arranged if necessary, and to assure that the test date is acceptable for an observer to be present. A completed Proposed Test Plan form may serve the purpose of notification and must be approved by the Air Pollution Control Program prior to conducting the required emission testing. [Special Condition 12H]

Recordkeeping:

- 1) The permittee shall maintain an operational log, which shall detail each startup, shutdown, and malfunction of the Unit 1 Boiler and associated pollution control systems. [Special Condition 14A]
- 2) The permittee shall maintain inspection, maintenance, and repair log(s) for the Unit 1 Boiler and associated pollution control systems. [Special Condition 14D]
- 3) The permittee shall continuously monitor and record the following process parameters: [Special Condition 14G]
 - a) Operating status of each major piece of equipment;
 - b) Gross kilowatts produced by the turbine(s) associated with the Unit 1 Boiler;
 - c) Mass feed rate of coal fed to the Unit 1 Boiler;
 - d) Pressure drop across the baghouse(s) that are associated with the Unit 1 Boiler;
 - e) Ammonia injection rate for the SCR system;
 - f) Inlet NO_x upstream of the SCR system;
 - g) Flue gas temperature in the vicinity of ammonia injection;
 - h) Flue gas temperature at the outlet of the SCR catalyst; and
 - i) Pressure drop across the SCR catalyst.
- 4) The permittee shall maintain daily records to demonstrate compliance with the heat input rate limitation for the Unit 1 Boiler. [Special Condition 15B]

- 5) The permittee shall maintain all records required by this permit for not less than five (5) years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request. [Special Condition 15D]

Reporting:

- 1) Within 90 days after initial startup of the modified Unit 1 Boiler, Kansas City Power and Light Company shall submit to the Air Pollution Control Program detailed descriptive information (e.g., as-built drawings, copies of work orders, copies of contracts) to cover the following:
[Special Condition 22]
- Low-NOx burner design;
 - Burner and over-fire air port locations and specifications relating to the revised combustion system;
 - Modifications to the turbine/generator set;
 - Increased economizer surface area;
 - Modifications to the bottom ash and economizer ash handling system(s); and
 - Modifications to the boiler feedwater pump.
- 2) The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than ten (10) days after the day in which emissions exceed the limits established by this permit. [Special Condition 16A]
- 3) The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than ten (10) days after the day in which operation of equipment at this installation is not in accordance with any operational limitation or condition established by this permit. [Special Condition 16B]
- 4) The permittee shall comply with the requirements of 10 CSR 10-6.050 with regard to Start-Up, Shutdown and Malfunction Conditions. [Special Condition 16C]
- 5) The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than ten (10) days after the date in which it is discovered that emission factors used in this permit (or permit application) underestimated actual emissions. [Special Condition 16D]

PERMIT CONDITION EU0010-002

10 CSR 10-6.070 New Source Performance Regulations

40 CFR Part 60 Subpart D, Standards of Performance for Fossil-Fuel-Fired Steam Generating Units
for Which Construction is Commenced After August 17, 1971

Emission Limitation:

- 1) The permittee shall not cause to be discharged into the atmosphere from the facility any gases which:
[§60.42(a)]
- Contain particulate matter in excess of 43 nanograms per joule heat input (0.10 pounds per million Btu) derived from fossil fuel.
 - Exhibit greater than twenty percent opacity except for one six-minute period per hour of not more than 27 percent opacity.
- 2) The permittee shall not cause to be discharged into the atmosphere from the facility any gases which contain sulfur dioxide in excess of: [§60.43(a)]
- 340 nanograms per joule heat input (0.80 pounds per million Btu) derived from liquid fossil fuel.
 - 520 nanograms per joule heat input (1.2 pounds per million Btu) derived from solid fossil fuel.
 - Compliance shall be based on the total heat input from all fossil fuels burned. [§60.43(c)]

- 3) The permittee shall not cause to be discharged into the atmosphere from the facility any gases which contain nitrogen oxides, expressed as NO₂ in excess of: [\[§60.44\(a\)\]](#)
 - a) 129 nanograms per joule heat input (0.30 pounds per million Btu) derived from liquid fossil fuel.
 - b) 300 nanograms per joule heat input (0.70 pounds per million Btu) derived from solid fossil fuel (except lignite or a solid fossil fuel containing 25 percent, by weight, or more of coal refuse).
 - c) 260 nanograms per joule heat input (0.60 pounds per million Btu) derived from lignite.

Monitoring:

The installation shall install, calibrate, maintain, and operate continuous monitoring systems for measuring the opacity of emissions, sulfur dioxide emissions, nitrogen oxides emissions, and either oxygen or carbon dioxide. [\[§60.45\(a\)\]](#)

Record Keeping:

- 1) The permittee shall keep a record of continuous monitoring system data, including a thirty-day rolling average of the emissions of sulfur dioxide and nitrogen oxides.
- 2) All records shall be maintained onsite for a minimum of five (5) years and shall be made available to Department of Natural Resources' personnel upon request.

Reporting:

- 1) Excess emission and monitoring system performance (MSP) reports shall be submitted to the Air Pollution Control Program semi-annually for each six-month period in the calendar year. All semi-annual reports shall be postmarked by the 30th day following the end of each six-month period. Each excess emission and MSP report shall include the following information: [\[§60.45\(g\)\]](#)
 - a) The magnitude of excess emissions computed in accordance with §60.13(h), any conversion factor(s) used, and the date and time of commencement and completion of each time period of excess emissions. The process operating time during the reporting period. [\[§60.7\(c\)\(1\)\]](#)
 - b) Specific identification of each period of excess emissions that occurs during startups, shutdowns, and malfunctions of the affected facility. The nature and cause of any malfunction (if known), the corrective action taken or preventative measures adopted. [\[§60.7\(c\)\(2\)\]](#)
 - c) The date and time identifying each period during which the continuous monitoring system was inoperative except for zero and span checks and the nature of the system repairs or adjustments. [\[§60.7\(c\)\(3\)\]](#)
 - d) When no excess emissions have occurred or the continuous monitoring system(s) have not been inoperative, repaired, or adjusted, such information shall be stated in the report. [\[§60.7\(c\)\(4\)\]](#)
- 2) Periods of excess emissions and monitoring systems (MS) downtime that shall be reported are defined as follows: [\[§60.45\(g\)\]](#)
 - a) *Opacity*. Excess emissions are defined as any six-minute period during which the average opacity of emissions exceeds twenty percent opacity, except that one six-minute average per hour of up to 27 percent opacity need not be reported. [\[§60.45\(g\)\(1\)\]](#)
 - b) *Sulfur dioxide*. Excess emissions for affected facilities are defined as any three-hour period during which the average emissions (arithmetic average of three contiguous one-hour periods) of sulfur dioxide as measured by a continuous monitoring system exceed the applicable standard under §60.43. [\[§60.45\(g\)\(2\)\(i\)\]](#)
 - c) *Nitrogen oxides*. Excess emissions for affected facilities using a continuous monitoring system for measuring nitrogen oxides are defined as any three-hour period during which the average emissions (arithmetic average of three contiguous one-hour periods) exceed the applicable standards under §60.44. [\[§60.45\(g\)\(3\)\]](#)

PERMIT CONDITION EU0010-003
 10 CSR 10-6.270 Acid Rain source Permits Required
 40 CFR Part 72 through Part 76

Emission Limitation:

- 1) The permittee shall obtain an Acid Rain Source Permit for the combustion Boiler EU0010 pursuant to Title IV of the Clean Air Act.
- 2) An acid rain permit OP2010-007 (Missouri Department of Natural Resources project 2009-06-064) was issued to this facility February 3, 2010 (see Attachment A).

Monitoring/Recordkeeping/Reporting

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

PERMIT CONDITION EU0010– 004
 10 CSR 10-6.362 Clean Air Interstate Rule Annual NOx Trading Program
 10 CSR 10-6.364 Clean Air Interstate Rule Seasonal NOx Trading Program
 10 CSR 10-6.366 Clean Air Interstate Rule SOx Trading Program

Emission Limitation:

The permittee shall obtain a CAIR Source Permit for the Unit 1 Boiler (EU0010).

A CAIR Permit (Missouri Department of Natural Resources project 2007-07-005, ORIS Code 6065) is being issued to the permittee in conjunction with this Title V permit. (See Attachment H)

Monitoring/Recordkeeping:

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

Reporting:

Annual Compliance Certification.

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

EU0020 – Boiler #2			
Emission Unit	Description	Manufacturer/Model #	2006 EIQ Reference #
EU0020	Boiler #2 – 8,100 MMBtu/hr; Primary Fuel: Subbituminous Coal; Secondary Fuel: #2 Fuel Oil; Control Devices: SCR with ammonia injection, baghouse, and wet scrubber; Construction Date: 2010	Unknown	n/a

PERMIT CONDITION EU0020-001

10 CSR 10-6.060 Construction Permits Required
Construction Permit No. 012006-019D, Issued October 22, 2008

Emission Limitations:

1. The following emission limits apply to the stack that is associated with the Unit 2 pulverized coal boiler and associated pollution control equipment. KCPL shall not exceed the following emission limits: [Special Condition 3E.1 through 14]
 - a) NO_x – 0.07 lbs/MMBTU, based on a 30 day rolling average.
 - b) SO₂ – 0.06 lbs/MMBTU, based on a 30 day rolling average.
 - c) SO₂ – 4,374 lb/hr, based on a 24-hour rolling average.
 - d) SO₂ – 6,885 lb/hr, based on a 3-hour block average.
 - e) PM₁₀ – 0.0236 lb/MMBTU, based on a 30-day rolling average. This limit includes both filterable and condensable particulate matter.
 - f) Filterable PM₁₀ – 0.014 lbs/MMBTU, based on a 3-hour rolling average.
 - g) Filterable Particulate Matter – 0.015 lb/MMBTU, based on a 3-hour rolling average
 - h) Opacity – 15 percent (six-minute average) excluding periods of start-up and shut-down, except for one six-minute period per hour of not more than 27 percent.
 - i) CO – 0.14 lbs/MMBTU, based on 30-day rolling average.
 - j) VOC – 0.0036 lb/MMBTU, test method average.
 - k) Vapor Phase Mercury – KCPL shall comply with the following three limits:
 - i) 39×10^{-6} lbs/gross MWh, based on a rolling annual average;
 - ii) The federally established emission limitation applicable to this unit; and,
 - iii) 210 lbs/year, total for Unit 1 and Unit 2, based on a rolling annual average.
 - l) Sulfuric Acid Mist (H₂SO₄) – 0.0052 lbs/MMBTU, test method average.
 - m) Lead (Pb) – 5.93×10^{-6} lbs/MMBTU, test method average.
 - n) HF – 34.43 lbs/hr, test method average.

Note: These emission limits (except the opacity limit) include periods of star-up, shutdown and malfunction.; see also 10 CSR 10-6.050 and the definitions in 10 CSR 6.020.

Operational Requirements:

- 1) The Unit 2 boiler shall utilize a low-sulfur (less than 1.4 lbs SO₂/MMBTU generated upon combustion) subbituminous coal as the primary fuel. The heat input to the boiler shall not exceed 8,200 MMBTU per hour. No. 2 fuel oil with a sulfur content of less than 0.05 percent shall be used for light off, startup and flame stabilization. No other fuels shall be used without receiving prior written authorization from the Air Pollution Control Program. [Special Condition 3A]
- 2) The permittee may propose alternate methods for calculating the heat input to the boiler. Prior to using any alternate methods the permittee must receive written approval from the Director of the Air Pollution Control Program. Heat input rate compliance demonstrations shall be accomplished using coal mass feed rate data, oil volumetric flow rate data and heating value analyses of the coal and oil. The higher heating value for coal used in the heat input rate compliance calculations shall be at least 95 percent of the thirty-day rolling average of as-received coal higher heating values. The higher heating value for oil used in the heat input rate compliance calculations shall be the results of the most recent analysis, or 135,000 Btu per gallon, whichever is greater. The 95th percentile heat input rate for any given 24-hour period shall not exceed the rates specified in Operational Limitations of

- 3) Special Conditions 2A and 20 of Construction Permit 012006-019D. The 95th percentile heat input rate shall be calculated at least once per hour and shall include data from the 24-hour period that just passed. [Special Condition 21]
- 4) KCPL shall install and effectively operate an SCR unit for the Unit 2 boiler. At least 120 days prior to initial startup, KCPL shall submit to the Air Pollution Control Program, design specifications and an operations and monitoring manual for the SCR unit to include the information listed in Special Condition 2B (Under ***The Emission Control Operation Requirements*** 1. (a) through (l) under Permit Condition EU0010-001). [Special Condition 3B]
- 5) KCPL shall install and effectively operate a flue gas desulfurization system (wet scrubber) for the Unit 2 boiler. At least 120 days prior to initial startup, KCPL shall submit to the Air Pollution Control Program design specifications, process flow diagrams, elevation and layout drawings and an operations and maintenance manual for the flue gas desulfurization system. [Special Condition 3C]
- 6) KCPL shall install and effectively operate a fabric filtration system (baghouse(s)) for the Unit 2 boiler. At least 120 days prior to initial startup, KCPL shall submit to the Air Pollution Control Program design specifications, process flow diagrams, elevation and layout drawings and an operations and maintenance manual for the fabric filtration system. [Special Condition 3D]
- 7) KCPL shall maintain the pulverized coal boiler and associated air pollution control equipment in accordance with good air pollution control practices to assure proper functioning of the equipment and minimize malfunctions. [Special Condition 3F]

Emission Control Operational Requirements:

- 1) The permittee shall operate the baghouse(s) in accordance with the following:
 - a) All baghouses shall be operated and maintained in accordance with the manufacturer's specifications. [Special Condition 9A]
 - b) Each baghouse shall be equipped with a gauge that indicates pressure drop across the control device. Pressure gauges or a visual display of the pressure data (i.e., monitor or chart) shall be located such that the Department of Natural Resources' personnel may easily observe them during a site visit. [Special Condition 9A]
 - c) Replacement filters for the baghouses shall be kept on hand at all times. The bags shall be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance). [Special Condition 9A]
 - d) The permittee shall monitor and record the operating pressure drop across the baghouses at least once every 24 hours. The operating pressure drop shall be maintained within the design conditions specified by the manufacturer (see Attachment F). [Special Condition 9B]
 - e) The permittee shall maintain an operating and maintenance log for the baghouses which shall include the following: [Special Condition 9C]
 - i) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
 - ii) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.

Testing Requirements:

- 1) Initial performance/certification testing shall be conducted in order to verify compliance with the emission limitations listed in (1) through (15) under "*Emission Limitations*" above, and to certify the accuracy of the continuous emission monitoring systems (CEMS). [Special Condition 12A]
- 2) The performance/certification tests shall be performed within sixty days of achieving the maximum production rate, but no later than 180 days after initial startup. [Special Condition 12B]

- 3) The date on which performance/certification tests are conducted shall be pre-arranged with the Air Pollution Control Program a minimum of thirty days prior to the proposed test so that a pretest meeting may be arranged if necessary, and to assure that the test date is acceptable for an observer to be present. A completed Proposed Test Plan form may serve the purpose of notification and must be approved by the Air Pollution Control Program prior to conducting the required emission testing. [Special Condition 12C]
- 4) During the initial performance tests the permittee shall analyze a minimum of ten (10) representative samples of as-received coal for the following parameters (the analytical results shall be submitted with the performance test report): [Special Condition 12D]
 - a) Higher Heating Value
 - b) Ash
 - c) Moisture
 - d) Sulfur
 - e) Arsenic
 - f) Beryllium
 - g) Cadmium
 - h) Chlorine
 - i) Chromium
 - j) Fluorine
 - k) Lead
 - l) Manganese
 - m) Mercury
 - n) Nickel
 - o) Selenium
- 5) As part of the initial performance test, the permittee shall measure emission rates for hydrogen fluoride, arsenic, beryllium, cadmium, chromium, cobalt, manganese, nickel and selenium from the Unit 2 Boiler. In the event that the measured emission rates of these HAPs exceed the emission rates used in the air quality analysis, then the permittee shall be required to submit to the Air Pollution Control Program a revised ambient air quality analysis for these pollutants. [Special Condition 12E]
- 6) As part of the performance/certification test plan, the permittee shall include details regarding the CEMS to include the following: [Special Condition 12F]
 - a) Manufacturer's specifications for the analyzers,
 - b) A description of how the installation of sampling probes and lines was conducted to ensure compliance with applicable regulatory requirements and to ensure delivery of a properly conditioned representative sample of stack gas to the analyzer(s), and
 - c) A description of the testing procedures and methods that will be utilized to certify the accuracy of the CEMs.
- 7) Two (2) copies of a written report of the performance test results shall be submitted to the Director of the Air Pollution Control Program within thirty days of completion of any required testing. The report must include legible copies of the raw data sheets, analytical instrument laboratory data, and complete sample calculations from the required EPA method for at least one (1) sample run. [Special Condition 12G]
- 8) With regard to the Unit 2 Boiler, stack testing for VOC, sulfuric acid mist, lead, hydrogen fluoride, condensable particulate matter and filterable PM₁₀ shall be repeated at least once every two years and the results shall be reported to the Air Pollution Control Program. The date on which these stack tests are conducted must be pre-arranged with the Air Pollution Control Program a minimum of thirty days prior to the proposed test so that a pretest meeting may be arranged if necessary, and to

assure that the test date is acceptable for an observer to be present. A completed Proposed Test Plan form may serve the purpose of notification and must be approved by the Air Pollution Control Program prior to conducting the required emission testing. [Special Condition 12H]

Monitoring:

- 1) The permittee shall install, certify, operate, calibrate, test and maintain CEMS for NO_x, SO₂, CO and any necessary auxiliary monitoring equipment in accordance with all applicable regulations. If there are conflicting regulatory requirements, the more stringent shall apply. [Special Condition 13A]
- 2) The permittee shall install, certify, operate, calibrate, test and maintain COMS for opacity in accordance with all applicable regulations. If there are conflicting regulatory requirements, the more stringent shall apply. [Special Condition 13B]
- 3) The permittee shall install, certify, operate, calibrate, test and maintain CEMS for vapor phase mercury in accordance with the Environmental Protection Agency's regulations published in the May 18, 2005 Federal Register. See 40 CFR Part 75, Appendices A, B and K. [Special Condition 13C]
- 4) The permittee shall install, certify, operate, correlate and maintain CEMS for particulate matter in accordance with the performance specification and quality assurance procedures of 40 CFR Part 60, Appendix B, Performance Specification 11 and Appendix F, Procedure 2. [Special Condition 13D]
- 5) The permittee shall install and operate a data acquisition and handling system to calculate emissions in terms of the emission limitations specified in this permit. [Special Condition 13E]
- 6) Compliance with the NO_x, SO₂ and CO emission limits for the Unit 2 Boiler shall be demonstrated through the use of the required CEMS. [Special Condition 13F]
- 7) Compliance with the opacity limit for the Unit 2 Boiler shall be demonstrated through the use of the required COMS. [Special Condition 13G]
- 8) Compliance with the PM₁₀, filterable PM₁₀ and filterable particulate matter emission limits for the Unit 2 Boiler shall be demonstrated through the use of the required CEMS, however data gathered from the CEMS shall be adjusted as follows: [Special Condition 13H]

$$PM_{10} = PM_{CEM} + PM_{CONDENSIBLE} - PM_{>10}$$
$$\text{Filterable } PM_{10} = PM_{CEM} - PM_{>10}$$

Where,

PM_{CEM} = reported value from the particulate matter CEMS.
= Filterable particulate matter.

PM_{CONDENSIBLE} = condensible particulate matter, from the stack test data.

PM_{>10} = mass fraction of particulate matter greater than ten microns in diameter
(from stack test data) multiplied by PM_{CEM}.

- 9) Compliance with the mercury emission limits for the pulverized coal boilers shall be demonstrated through use of the required CEMS. [Special Condition 13I]

Post-Construction Ambient Air Monitoring:

- 1) KCPL shall conduct post-construction ambient air monitoring for mercury and PM₁₀ for a minimum of one (1) year after the Unit 2 boiler is fully operational. The monitoring period shall begin within six (6) months of the date that the Unit 2 pulverized coal boiler becomes fully operational. Monitoring may be discontinued upon written request and receipt of approval from the Air Pollution Control Program Director. [Special Condition 17A]

- 2) The monitoring shall be conducted under an approved Quality Assurance Project Plan at sites approved by the Air Pollution Control Program. [Special Condition 17B]
- 3) The Quality Assurance Project Plan shall be submitted to the Air Pollution Control Program at least twelve (12) months prior to the date that the Unit 2 boiler becomes fully operational. [Special Condition 17C]
- 4) In the event that post-construction monitoring reveals a concentration of mercury, at or beyond the property boundary, in excess of 0.14 micrograms per cubic meter, 24-hour averaging time, then KCPL shall submit a corrective action plan to the Air Pollution Control Program within 20 days of receipt of such analytical results. The corrective action plan shall specify additional control measures that will be employed to control mercury emissions from combustion by-product handling and disposal. [Special Condition 17D]
- 5) The post-construction PM10 monitoring shall be evaluated along with the pre-construction monitoring data collected at this location. The purpose of this portion of the monitoring exercise is to evaluate the 24-hour PM10 increment standard. If this evaluation demonstrates a contribution greater than the increment standard from the new project emissions, then KCPL shall submit a corrective action plan to the Air Pollution Control Program to address this finding. The corrective action plan shall identify alternatives to reduce particulate emissions/impacts. The corrective action plan will be due 30 days from a finding of excessive concentration. [Special Condition 17E]

Recordkeeping:

- 1) The permittee shall maintain an operational log, which shall detail each startup, shutdown, and malfunction of the Unit 2 Boiler and associated pollution control systems. [Special Condition 14A]
- 2) The permittee shall maintain inspection, maintenance, and repair log(s) for the Unit 2 Boiler and associated pollution control systems. [Special Condition 14D]
- 3) The permittee shall continuously monitor and record the following process parameters: [Special Condition 14G]
 - a) Operating status of each major piece of equipment;
 - b) Gross kilowatts produced by the turbine(s) associated with the Unit 2 Boiler;
 - c) Mass feed rate of coal fed to the Unit 2 Boiler;
 - d) Pressure drop across the baghouse(s) that are associated with the Unit 2 Boiler;
 - e) Ammonia injection rate for the SCR system;
 - f) Inlet NO_x upstream of the SCR system;
 - g) Flue gas temperature in the vicinity of ammonia injection;
 - h) Flue gas temperature at the outlet of the SCR catalyst; and
 - i) Pressure drop across the SCR catalyst.
- 4) The permittee shall maintain daily records to demonstrate compliance with the heat input rate limitation for the Unit 2 Boiler. [Special Condition 15B]
- 5) The permittee shall maintain all records required by this permit for not less than five (5) years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request. [Special Condition 15D]

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than ten (10) days after the day in which emissions exceed the limits established by this permit. [Special Condition 16A]
- 2) The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than ten (10) days after the day in which

operation of equipment at this installation is not in accordance with any operational limitation or condition established by this permit. [Special Condition 16B]

- 3) The permittee shall comply with the requirements of 10 CSR 10-6.050 with regard to Start-Up, Shutdown and Malfunction Conditions. [Special Condition 16C]
- 4) The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than ten (10) days after the date in which it is discovered that emission factors used in this permit (or permit application) underestimated actual emissions. [Special Condition 16D]

PERMIT CONDITION EU0020-002

10 CSR 10-6.070 New Source Performance Regulations

40 CFR Part 60 Subpart Da, Standards of Performance for Electric Utility Steam Generating Units for Which Construction Is Commenced After September 18, 1978

Emission Limitations:

- 1) Emissions standard for Particulate Matter:
 - a) The permittee shall not cause to be discharged into the atmosphere from this source any gases which exhibit greater than 20 percent opacity (6-minute average), except for one 6-minute period per hour of not more than 27 percent opacity. [§60.42Da(b)]
 - b) The permittee shall not cause to be discharged into the atmosphere from this source any gases that contain PM in excess of either:
 - i) 18 ng/J (0.14 lb/MWh) gross energy output; or
 - ii) 6.4 ng/J (0.015 lb/MMBtu) heat input derived from the combustion of solid, liquid, or gaseous fuel. [§60.42Da(c)(1)-(2)]
 - c) As an alternative to meeting the requirements of §60.42Da(c)(1)-(2), the permittee may elect to meet the following emission limitations:
 - i) Not cause to be discharged into the atmosphere from this source any gases that contain PM in excess of 13 ng/J (0.03 lb/MMBtu) and 0.1 percent of the combustion concentration determined according to the procedure in §60.48Da(o)(5) (99.8% reduction) when combusting solid liquid or gaseous fuel; or
 - ii) 0.2 percent of the combustion concentration determined according to the procedure in §60.48Da(o)(5) (99.8 percent reduction) when combusting solid, liquid, or gaseous fuel. [§60.42Da(d)(1)-(3)]
- 2) Emission standard for Sulfur Dioxide:
 - a) The permittee shall not cause to be discharged into the atmosphere from this source any gases which contain the following:
 - i) SO₂ in excess of 180 ng/J (1.4 lb/MWhr) gross energy output on a 30-day rolling average basis; or
 - ii) Five percent of the potential combustion concentration (95 percent reduction) on a 30-day rolling average basis. [§60.43Da(i)(1)(i)-(ii)]
- 3) Standard for Nitrogen Oxides (NO_x):
 - a) The permittee shall not cause to be discharged into the atmosphere from this source any gases that contain NO_x (expressed as NO₂) in excess of 130 ng/J (1.0 lb/MWh) gross energy output on a 30-day rolling average basis. [§60.44Da(E)(1)]
- 4) Emission standard for Mercury:
 - a) The permittee shall not cause to be discharged into the atmosphere from this source any gases that contain mercury (Hg) emissions in excess of 66×10^{-6} lb/Mwh or 0.066 lb/GWh (.0083 ng/J) on an output basis. [§60.48Da(a)(2)]

- 5) The permittee is subject to the compliance provisions of §60.48Da and the compliance determination procedures and methods of §60.50Da.

Monitoring:

- 1) The permittee shall install, calibrate, maintain, and operate a CEMS according to §60.49Da for measuring the following:
 - a) Opacity of emissions discharged to the atmosphere; [§60.49Da(a)]
 - b) Sulfur Dioxide emissions; [§60.49Da(b)]
 - c) Nitrogen Oxide emissions; [§60.49Da(c)]
 - d) Oxygen or carbon dioxide content of the flue gases at each location where sulfur dioxide or nitrogen oxide emissions are monitored; [§60.49Da(d)]
 - e) Concentration of Hg in the exhaust gasses from each stack. [§60.49Da(p)]
- 2) The CEMS shall be operated and data recorded during all periods of operation of the facility including periods of startup, shutdown, malfunction or emergency conditions, except for CEMS breakdowns, repairs, calibration checks, and zero and span adjustments. [§60.49Da(e)]

Record Keeping:

The permittee shall provide notifications in accordance with §60.7(a) and shall maintain records of all information needed to demonstrate compliance including performance tests, monitoring data, fuel analyses, and calculations consistent with the requirements of §60.7(f). [§60.52Da]

Reporting:

- 1) For SO₂, NO_x, PM, and Hg emissions, the performance test data from the initial and subsequent performance test and from the performance evaluation of the continuous monitors are submitted to the Administrator. [§60.51Da(a)]
- 2) For SO₂ and NO_x the following information is reported to the Administrator from each 24-hour period: [§60.51Da(b)(1)-(9)]
 - a) Calendar date;
 - b) The average SO₂ and NO_x emission rates for each 30 successive boiler operating days, ending with the last 30-day period in the quarter; reasons for non-compliance with the emission standards; and description of corrective actions taken;
 - c) Percent reduction of the potential combustion concentration of SO₂ for each 30 successive boiler operating days, ending with the last 30-day period in the quarter; reasons for non-compliance with the standard; and, description of corrective actions taken;
 - d) Identification of the boiler operating days for which pollutant or diluent data have not been obtained for at least 75 percent of the hours of operation; justification for not obtaining sufficient data; and description of corrective actions taken;
 - e) Identification of the times when emissions data have been excluded from the calculation of average emission rates because of startup, shutdown, malfunction, emergency conditions, or other reasons, and justification of those times;
 - f) Identification of “F” factor used for calculations, method of determination, and type of fuel combusted;
 - g) Identification of times when hourly averages have been obtained based on manual sampling methods;
 - h) Identification of times when the pollutant concentration exceeded full span of the CEMS; and
 - i) Description of any modifications to CEMS which could affect the ability of the CEMS to comply with Performance Specifications 2 or 3.

- 3) If the minimum quantity of emission data is not obtained for an 30 successive boiler operating days the information listed in §60.61Da(c)(1)-(5) shall be reported to the administrator for that 30-day period.
- 4) If any standards are exceeded during emergency conditions because of control system malfunction the permittee shall submit the information listed in §60.51Da(d)(1)-(2).
- 5) For any periods for which opacity, SO₂, or NO_x emissions data are not available, the owner or operator of the affected facility shall submit a signed statement indicating if any changes were made in operation of the emission control system during that period. [§60.51Da(f)]
- 6) For Hg, the following information shall be reported to the Administrator: [§60.51Da(g)(1)-(5)]
 - a) Company name and address;
 - b) Date of report and beginning and ending dates of the reporting period;
 - c) The applicable Hg emission limit; and
 - d) For each month in the reporting period:
 - i) The number of unit operating hours;
 - ii) The number of unit operating hours with valid data for Hg concentration, stack gas flow rate, moisture (if required), and electrical output;
 - iii) The monthly Hg emission rate (lb/MWh);
 - iv) The number of hours of valid data excluded from the calculation of the monthly Hg emission rate, due to unit startup, shutdown and malfunction; and
 - v) The 12-month rolling average Hg emission rate (lb/MWh); and
 - e) The data assessment report (DAR) required by appendix F to this part, or an equivalent summary of QA test results if the QA of part 70 or this chapter are implemented.
- 7) The permittee shall submit a signed statement indicating whether: [§60.51Da(h)(1)-(4)]
 - a) The required CEMS calibration, span, and drift checks or other periodic audits have or have not been performed as specified;
 - b) The data used to show compliance was or was not obtained in accordance with approved methods;
 - c) The minimum data requirements have been met; and
 - d) Compliance with the standards have been achieved during the reporting period.
- 8) The permittee shall submit the written reports required under this section and Subpart A to the Administrator semi-annually for each six-month period. All semi-annual reports shall be postmarked by the 30th day following the end of each six-month period. [§60.51Da(i)]

PERMIT CONDITION EU0020-003

10 CSR 10-6.270 Acid Rain source Permits Required
40 CFR Part 72 through Part 76

Emission Limitation:

- 1) The permittee shall obtain an Acid Rain Source Permit for the combustion Boiler EU0020 pursuant to Title IV of the Clean Air Act.
- 2) An acid rain permit, OP2010-007 (Missouri Department of Natural Resources project 2009-06-064) was issued to this facility February 3, 2010 (see Attachment A).

Monitoring/Recordkeeping/Reporting

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

PERMIT CONDITION EU0020– 004

10 CSR 10-6.362 Clean Air Interstate Rule Annual NOx Trading Program
 10 CSR 10-6.364 Clean Air Interstate Rule Seasonal NOx Trading Program
 10 CSR 10-6.366 Clean Air Interstate Rule SOx Trading Program

Emission Limitation:

The permittee shall obtain a CAIR Source Permit for the Unit 2 Boiler (EU0020).

A CAIR Permit (Missouri Department of Natural Resources project 2007-07-005, ORIS Code 6065) is being issued to the permittee in conjunction with this Title V permit. (See Attachment H)

Monitoring/Recordkeeping:

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

Reporting:

Annual Compliance Certification.

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

EU0030 through EU0070 - Coal Handling, Transfer and Storage			
Emission Unit	Description	Manufacturer/Model #	2006 EIQ Reference #
EU0030	Coal Train Unloading; MHDR = 4000 tons/hr; Control Device: Baghouse	n/a	EP-01
EU0040	Coal transfer and Conveying; MHDR = 4000 tons/hr; Control Device: Process Enclosed with Baghouse	n/a	EP-03
EU0050	Coal Crushing and Transfer; MHDR = 1500 tons/hr; Control Device: Baghouse	n/a	EP-04
EU0060	Coal Storage Pile; Footprint shall not exceed 36.3 Acres; Control Device: Application of Water/Chemical Dust Suppressant	n/a	EP-02
EU0070	Coal Storage Silos; Control Device: Baghouse	n/a	n/a

PERMIT CONDITION (EU0030 through EU0070)-001

10 CSR 10-6.060 Construction Permits Required
 Construction Permit 012006-019D, October 27, 2008

Operational Limitations and Requirements:

- 1) The coal storage pile footprint area (active and in-active storage) shall not exceed 36.3 acres. [Special Condition 1A]
- 2) The rail car unloading rate shall not exceed 4,000 tons of coal per hour, averaged over the duration of a train-set unloading event. [Special Condition 1B]
- 3) Particulate emissions from rail car unloading shall be controlled by a baghouse. [Special Condition 1C1]

- 4) A water/chemical dust suppressant mixture shall be applied to the coal at a point between the rail car unloading hopper and the transfer tower. [Special Condition 1C2]
- 5) The permittee shall periodically add water and/or chemical dust suppressant to the top of the coal storage pile. A system shall be designed, constructed and operated to allow for distribution of water and/or chemical dust suppressant over the top of the coal storage pile. The use of truck-mounted pumps is acceptable provided that this method is capable of effective distribution over all areas of the storage pile. [Special Condition 1C3]
- 6) Coal conveyance and transfer systems shall be enclosed and vented to a baghouse. For any portions of the coal conveyance system that cannot be enclosed and vented to a baghouse, the permittee must receive prior written authorization from the Air Pollution Control Program for an alternate control method prior to startup. [Special Condition 1C4]
- 7) A telescoping chute shall be used to drop coal from conveying equipment to the storage pile and the free fall distance from the end of the chute to the top of the coal pile shall be less than ten (10) feet. [Special Condition 1C5]
- 8) Particulate emissions from coal crushing and transfer operations shall be controlled by a baghouse. [Special Condition 1C6]
- 9) Particulate emissions from the pulverized coal storage silos shall be controlled by a baghouse. [Special Condition 1C7]
- 10) Housekeeping measures such as sweeping, water washing and vacuuming shall be used to clean equipment, structures and pavement to prevent or minimize generation of fugitive particulate emissions to the extent practicable. [Special Condition 1C8]

Recordkeeping:

- 1) The permittee shall maintain daily records for railcar unloading operations. For each train-set unloaded, the permittee shall record the total duration of the unloading event and total mass of coal unloaded. The permittee shall calculate an average unloading rate for each unloading event. [Special Condition 15A]
- 2) The permittee shall record the analysis of higher heating value, ash, sulfur and moisture content of every shipment of coal that is delivered to the installation, using a sample that is collected in a manner representative of the entire shipment. [Special Condition 14E]
- 3) The permittee shall maintain all records for not less than five (5) years and shall be made available to Department of Natural Resources' personnel upon request. [Special Condition 15D]

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than ten (10) days after the day in which emissions exceed the limits established by this permit. [Special Condition 16A]
- 2) The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than ten (10) days after the day in which operation of equipment at this installation is not in accordance with any operational limitation or condition established by this permit. [Special Condition 16B]
- 3) The permittee shall comply with the requirements of 10 CSR 10-6.050 with regard to Start-Up, Shutdown and Malfunction Conditions. [Special Condition 16C]
- 4) The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than ten (10) days after the date in which it is discovered that emission factors used in this permit (or permit application) underestimated actual emissions. [Special Condition 16D]

PERMIT CONDITION (EU0030 through EU0070)-002

10 CSR 10-6.070 New Source Performance Requirements
40 CFR Part 60, Subpart Y, Standards of Performance for Coal Preparation Plants

Emission Limitation:

The permittee shall not cause to be discharged into the atmosphere from any coal processing and conveying equipment, coal storage system, or coal transfer and loading system processing coal, gases which exhibit twenty percent opacity or greater. [40 CFR Part 60.252(c)]

Monitoring:

- 1) The permittee shall conduct a visual emission observation on this emission unit once a month using the procedures contained in U.S. EPA Test Method 22. At a minimum, the observer should be trained and knowledgeable about the effects on visibility of emissions caused by background contrast, ambient lighting, observer position relative to lighting, wind and the presence of uncombined water. Readings are only required when the emission unit is operating and when the weather conditions allow. If no visible or other significant emissions were observed using these procedures, then no further observations would be required. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct a Method 9 observation.
- 2) Should a violation be observed, monitoring frequency will progress in the following manner:
 - a) Weekly observations shall be conducted for a minimum of eight (8) consecutive weeks after the date of the initial violation. Should no violation of this regulation be observed during this period, then,
 - b) Observations must be made once every two weeks for a period of eight (8) weeks. If a violation is noted, monitoring reverts to weekly. Should no violation of this regulation be observed during this period, then,
 - c) Observations must be made once per month.
- 3) The permittee shall have an annual Certified Method 9 Test performed on the emission units.

Record Keeping:

- 1) The permittee shall maintain records of all observation results (see Attachments B and C), noting:
 - a) Whether any air emissions (except for water vapor) were visible from the emission units,
 - b) All emission units from which visible emissions occurred, and
 - c) Whether the visible emissions were normal for the process.
- 2) The permittee shall maintain records of any equipment malfunctions (see Attachment D).
- 3) The permittee shall maintain records of any Method 9 opacity test (see Attachment E) performed in accordance with this permit condition.
- 4) Attachments B, C, D and E contain logs including these record keeping requirements. These logs, or an equivalent created by the permittee, must be used to certify compliance with this requirement.
- 5) These records shall be made available immediately for inspection to Department of Natural Resources' personnel upon request.
- 6) All records shall be maintained for five years.

Reporting:

The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than ten days after the permittee determined using the Method 9 test that the emission unit(s) exceeded the opacity limit. Reports of any deviations from monitoring, record keeping and reporting requirements of this permit shall be submitted to the Air Pollution Control

Program, no later than the semi-annual monitoring report and annual compliance certification, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

EU0080 through EU0090 – Fly Ash Handling			
Emission Unit	Description	Manufacturer/Model #	2006 EIQ Reference #
EU0080	Fly Ash Conveying and Transfer; MHDR = 22 tons/hr; Control Device: Enclosed	n/a	EP-08
EU0090	Fly Ash Silo; Control Device: Baghouse	n/a	EP-07

<p>PERMIT CONDITION (EU0080 through EU0090)-001 10 CSR 10-6.060 Construction Permits Required Construction Permit 012006-019D, October 27, 2008</p>
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Operational Requirements:

- 1) Fly ash shall be conveyed pneumatically to a storage silo. Emissions from the storage silo shall be controlled by a baghouse. [Special Condition 4A]
- 2) A shrouded load-out spout with a vacuum return that is routed to a baghouse or fabric filter shall be used to control emissions when loading marketed fly ash from the fly ash silo to trucks that are leaving the site. [Special Condition 4B]
- 3) Fly ash that is destined for the landfill shall be conditioned to at least ten percent moisture content before it is disposed of in the landfill. [Special Condition 4C]
- 4) Bottom ash removed from the Unit 1 Boiler shall be conditioned to at least twenty percent moisture prior to subsequent handling. [Special Condition 4D]

Reporting:

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

<p>PERMIT CONDITION (EU0080 through EU0090)-002 10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants</p>

Emission Limitation:

- 1) No owner or other person shall cause or permit emissions to be discharged into the atmosphere from any **new** source any visible emissions with an opacity greater than twenty percent.
New source: any equipment, machine, device, article, contrivance or installation installed in the outstate Missouri area after February 24, 1971, or in the Springfield metropolitan area after September 24, 1971.
- 2) Exception: A person may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six (6) minutes in any sixty minutes air contaminants with an opacity up to sixty percent.

Monitoring:

- 1) The permittee shall conduct opacity readings on this emission unit using the procedures contained in U.S. EPA Test Method 22. At a minimum, the observer should be trained and knowledgeable about the effects on visibility of emissions caused by background contrast, ambient lighting, observer

position relative to lighting, wind and the presence of uncombined water. Readings are only required when the emission unit is operating and when the weather conditions allow. If no visible or other significant emissions are observed using these procedures, then no further observations would be required. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct a Method 9 observation.

- 2) The following monitoring schedule must be maintained:
 - a) Weekly observations shall be conducted for a minimum of eight consecutive weeks after permit issuance. Should no violation of this regulation be observed during this period then-
 - b) Observations must be made once every two (2) weeks for a period of eight weeks. If a violation is noted, monitoring reverts to weekly. Should no violation of this regulation be observed during this period then-
 - c) Observations must be made once per month. If a violation is noted, monitoring reverts to weekly.
- 3) If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.

Record Keeping:

- 1) The permittee shall maintain records of all observation results (see Attachment B and C), noting:
 - a) Whether any air emissions (except for water vapor) were visible from the emission units,
 - b) All emission units from which visible emissions occurred, and
 - c) Whether the visible emissions were normal for the process.
- 2) The permittee shall maintain records of any equipment malfunctions. (see Attachment D)
- 3) The permittee shall maintain records of any Method 9 test performed in accordance with this permit condition. (see Attachment E)
- 4) Attachments B, C, D and E contain logs including these record keeping requirements. These logs, or an equivalent created by the permittee, must be used to certify compliance with this requirement.
- 5) These records shall be made available immediately for inspection to Department of Natural Resources' personnel upon request.
- 6) All records shall be maintained for five years.

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than ten days after the permittee determined using the Method 9 test that the emission unit(s) exceeded the opacity limit.
- 2) Reports of any deviations from monitoring, record keeping and reporting requirements of this permit condition shall be submitted semi-annually, in the semi-annual monitoring report and annual compliance certification, as required by Section IV of this permit.

PERMIT CONDITION EU0090-003

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

Emission Limitation:

- 1) Particulate matter shall not be emitted from EU0090 in excess of 32.52 pounds per hour. This emission rate was calculated using the following equation:
For process weight rates of 60,000 pounds per hour or less:
$$E = 4.10(P)^{0.67}$$

Where:

E = rate of emission in lb/hr

P = process weight rate in tons/hr

- 2) The concentration of particulate matter in the exhaust gases shall not exceed 0.30 grains per scf.

Monitoring/Record Keeping:

- 1) The permittee shall retain the potential to emit calculations in the Statement of Basis which demonstrate that the above emission limitations will not be exceeded.
- 2) The calculation shall be made available immediately for inspection to the Department of Natural Resources’ personnel upon request.
- 3) All records shall be kept for a period of five years.

Reporting:

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

EU0100 – Haul Roads and Vehicle Activity			
Emission Unit	Description	Manufacturer/Model #	2006 EIQ Reference #
EU0100	Paved and Unpaved Haul Roads and Vehicle Activity	n/a	EP-09 and EP-10

PERMIT CONDITION EU0100-001
 10 CSR 10-6.060 Construction Permits Required
 Construction Permit 012006-019D, October 27, 2008

Operational Limitations:

- 1) Maintenance and/or repair of the road surface shall be conducted as necessary to ensure that the physical integrity of the pavement is adequate to achieve control of fugitive emissions from these roads. [Special Condition 10.A.1]
- 2) The permittee shall periodically water, wash and/or otherwise clean all of the paved portions of the haul roads as necessary to achieve control of fugitive emissions from these roads. [Special Condition 10.A.2]
- 3) The permittee shall control emissions from all unpaved haul roads by either documented watering or the application of chemical dust suppressant.
 - a) Any chemical dust suppressant used (such as magnesium chloride, calcium chloride, lignosulfonates, etc.) shall be applied in accordance with the manufacturer’s suggested application rate and re-applied as necessary to achieve control of fugitive emissions. [Special Condition 10.B.1.a]
 - b) Water shall be applied in accordance with a recommended application rate of 100 gallons per day per 1,000 square feet of unpaved/untreated surface area of haul roads/vehicle active area as necessary to achieve control of fugitive emissions. [Special Condition 10.B.2.a]
 - c) Meteorological precipitation of any kind, (e.g. a quarter inch or more rainfall, sleet, snow, and/or freeze thaw conditions) which is sufficient in the amount or conditions to achieve control of

fugitive emissions from these areas while the areas are in use, may be substituted for water application until such time as conditions warrant application of water.

[Special Condition 10.B.2.c]

- d) Watering may also be suspended when the ground is frozen, during periods of freezing conditions when watering would be inadvisable for traffic safety reasons, or when there will be no traffic on the roads. [Special Condition 10.B.2.d]
- 4) The permittee shall not exceed 2,010 tons hauled per day for the main facility entrance road (the road that runs in a southwesterly direction from State Highway 45 to the power plant and in various directions in the near vicinity of the power plant. The southern most extent of the main facility entrance road will be the limestone unloading area.). Tons hauled per day shall include the weight of fly ash, bottom ash, gypsum and limestone hauled in association with the operation of the Unit 1 and Unit 2 Boilers. [Special Condition 10.C.1]
- 5) The permittee shall not exceed 3,552 tons hauled per day for the landfill road (the road that runs from the power plant to the landfill). Tons hauled per day shall include the weight of fly ash, bottom ash, gypsum and limestone hauled in association with the operation of the Unit 1 and Unit 2 Boilers. [Special Condition 10.C.2]

Monitoring/Recordkeeping:

- 1) The permittee shall keep records of the time, date, and the amount of material applied for each application of chemical dust suppressant agent. [Special Condition 10.B.1.b]
- 2) The permittee shall maintain a log that documents daily water applications. This log shall include, but is not limited to, date and volumes (e.g., number of tanker applications and/or total gallons used) of water application. The log shall also record rationale for not applying water on day(s) the areas are in use (e.g., meteorological situations, precipitation events, freezing, etc.). [Special Condition 10.B.2.b]
- 3) The permittee shall maintain daily records to document the tonnage of combustion by-products and limestone hauled. [Special Condition 15C]
- 4) All records shall be kept on site for not less than five (5) years, and made available to Department of Natural Resources’ personnel upon request. [Special Conditions 10.B.1.b and 10.B.2.e]

Reporting:

The permittee shall report to the Air Pollution Control Program’s Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than ten (10) days after the day in which operation of equipment at this installation is not in accordance with any operational limitation or condition established by this permit. [Special Condition 16B]

EU0110 – Gasoline Storage Tank			
Emission Unit	Description	Manufacturer/Model #	2006 EIQ Reference #
EU0110	3,000 Gallon Gasoline Storage Tank for vehicle fueling; Constructed 1992; Controlled with Vapor Recovery and Submerged Fill	n/a	EP-36

PERMIT CONDITION EU0110-001
 10 CSR 10-2.260 Control of Petroleum Liquid Storage, Loading and Transfer

Operational Requirements:

- 1) The permittee shall not cause or permit the transfer of gasoline from a delivery vessel into a gasoline storage tank with a capacity greater than two hundred fifty (250) gallons unless:
 - a) The storage tank is equipped with a submerged fill pipe extending unrestricted to within six inches (6") of the bottom of the tank, and not touching the bottom of the tank, or the storage tank is equipped with a system that allows a bottom fill condition;
 - b) All storage tank caps and fittings are vapor-tight when gasoline transfer is not taking place; and
 - c) Each storage tank is vented via a conduit that is:
 - i) At least two inches (2") inside diameter;
 - ii) At least twelve feet (12') in height above grade; and
 - iii) Equipped with a pressure/vacuum valve that is CARB certified and MO/PETP approved at three inches water column pressure/eight inches water column vacuum (3" wcp/8" wcv).
- 2) Stationary storage tanks with a capacity greater than two thousand (2,000) gallons shall also be equipped with a Stage I vapor recovery system. The vapor recovery system shall collect no less than ninety percent (90%) by volume of the vapors displaced from the stationary storage tank during gasoline transfer and shall return the vapors via a vapor-tight return line to the delivery vessel.
- 3) The permittee shall operate the vapor recovery system and the gasoline loading equipment in a manner that prevents:
 - a) Gauge pressure from exceeding four thousand five hundred (4,500) pascals (eighteen inches (18") of H₂O) in the delivery vessel;
 - b) A reading equal to or greater than one hundred percent (100%) of the lower explosive limit (LEL, measured as propane) at two and one-half (2.5) centimeters from all points on the perimeter of a potential leak source when measured by the method referenced in 10 CSR 10-6.030(14)(E) during loading or transfer operations; and
 - c) Visible liquid leaks during loading or transfer operation.
- 4) The permittee shall repair and retest within fifteen (15) days, a vapor recovery system that exceeds any of the above limits.

Testing:

A static leak decay test of the Stage I vapor recovery system shall be required once every five (5) years to demonstrate system vapor tightness. In addition, a bench test of each pressure/vacuum valve shall be required once every two (2) years to demonstrate component vapor tightness.

Record Keeping:

- 1) The following records shall be kept on-site and shall be made immediately available to Department staff upon request:
 - a) Inspection reports;
 - b) Enforcement documents;
 - c) Gasoline deliveries;
 - d) Routine and unscheduled maintenance and repairs;
 - e) Results of all tests conducted;
 - f) A record documenting the vessel owners and number of delivery vessels unloaded by each owner; and
 - g) Copies of the loading ticket, manifest or delivery receipt for each grade of product received.
- 2) If a delivery receipt is retained rather than a manifest or loading ticket, the delivery ticket shall bear the following information:
 - a) Vendor name;
 - b) Date of delivery;

- c) Quantity of each grade;
 - d) Point of origin; and
 - e) The manifest or loading ticket number.
- 3) The required retention on-site of the loading ticket, manifest or delivery receipt shall be limited to the four (4) most recent records for each grade of product.
 - 4) All other records shall be kept on-site for a minimum of five (5) years.

Reporting:

The permittee shall report any deviations/exceedances of this permit condition to the Air Pollution Control Program’s Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than the semi-annual monitoring report and annual compliance certification, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

EU0120 –Degreasing Units			
Emission Unit	Description	Manufacturer	EIQ Reference #
EU0120	Four (4) Degreasing Units (2-20 gallon, 1-30 gallon, 1-75 gallon)	Chrystal Clean	EP20, 21, 49

Permit Condition EU0120-001
 10 CSR 10-2.210
 Control of Emissions from Solvent Metal Cleaning

Equipment Specifications:

- 1) The permittee shall not operate or allow the operation of any cold cleaner using a cold cleaning solvent with a vapor pressure greater than 1.0 mmHg (0.019 psi) at twenty degrees Celsius (20°C) (sixty-eight degrees Fahrenheit (68°F)).
- 2) Each cold cleaner shall have a cover which will prevent the escape of solvent vapors from the solvent bath while in the closed position or an enclosed reservoir which will limit the escape of solvent vapors from the solvent bath whenever parts are not being processed in the cleaner.
- 3) When one (1) or more of the following conditions exist, the design of the cover shall be such that it can be easily operated with one (1) hand such that minimal disturbing of the solvent vapors in the tank occurs. (For covers larger than ten (10) square feet, this shall be accomplished by either mechanical assistance such as spring loading or counterweighing or by power systems):
 - a) The solvent volatility is greater than 0.3 psi measured at one hundred degrees Fahrenheit (100°F), such as in mineral spirits;
 - b) The solvent is agitated; or
 - c) The solvent is heated.
- 4) Each cold cleaner shall have a drainage facility, which will be internal, so that parts are enclosed under the cover while draining.
- 5) If an internal drainage facility cannot fit into the cleaning system and the solvent volatility is less than 0.6 psi measured at one hundred degrees Fahrenheit (100°F), then the cold cleaner shall have an external drainage facility which provides for the solvent to drain back into the solvent bath.
- 6) A permanent conspicuous label summarizing the operating procedures shall be affixed to the equipment.
- 7) Any cold cleaner which uses a solvent that has a solvent volatility greater than 0.6 psi measured at one hundred degrees Fahrenheit (100°F) or heated above one hundred twenty degrees Fahrenheit (120°F) must use one (1) of the following control devices:

- a) A freeboard ratio of at least 0.75;
- b) Water cover (solvent must be insoluble in and heavier than water); or
- c) Other control systems with a mass balance demonstrated overall VOC emissions reduction efficiency greater than or equal to sixty-five percent (65%). These control systems must receive approval from the Director prior to their use.

Operating Procedures:

- 1) Cold cleaner covers shall be closed whenever parts are not being handled in the cleaners or the solvent must drain into an enclosed reservoir.
- 2) Cleaned parts shall be drained in the freeboard area for at least fifteen (15) seconds or until dripping ceases, whichever is longer.
- 3) Whenever a cold cleaner fails to perform within the operating parameters established for it by this rule, the unit shall be shut down immediately and shall remain shut down until trained service personnel are able to restore operation within the established parameters.
- 4) Solvent leaks shall be repaired immediately or the degreaser shall be shut down until the leaks are repaired.
- 5) Any waste material removed from a cold cleaner shall be disposed of by one (1) of the following methods and in accordance with the Missouri Hazardous Waste Management Commission rules codified at 10 CSR 10-25, as applicable:
 - a) Reduction of the waste material to less than twenty percent (20%) VOC solvent by distillation and proper disposal of the still bottom waste; or
 - b) Stored in closed containers for transfer to.
 - i) A contract reclamation service; or
 - ii) A disposal facility approved by the Director.
- 6) Waste solvent shall be stored in covered containers only.

Training:

- 1) Only persons trained in at least the operational and equipment requirements specified in this rule for their particular solvent metal cleaning process shall be permitted to operate the equipment.
- 2) The supervisor of any person who operates a solvent metal cleaning process shall receive equal or greater operational training than the operator.
- 3) Refresher training shall be given to all solvent metal cleaning equipment operators at least once per calendar year.

Record Keeping:

- 1) The permittee shall keep monthly inventory records of solvent types and amounts purchased and solvent consumption. These records shall include:
 - a) All types and amounts of solvent containing waste material transferred to either a contract reclamation service or to a disposal facility and all amounts distilled on the premises; and
 - b) Maintenance and repair logs for both the degreaser and any associated control equipment.
- 2) The permittee shall maintain records which include for each purchase of cold cleaning solvent:
 - a) The name and address of the solvent supplier;
 - b) The date of purchase;
 - c) The type of solvent; and
 - d) The vapor pressure of the solvent in mmHg at twenty degrees Celsius (20°C) (sixty-eight degrees Fahrenheit (68°F)).
- 3) A record shall be kept of solvent metal cleaning training for each employee.

- 4) All records shall be retained on-site for five (5) years and shall be made available to Department staff upon request.

Reporting:

The permittee shall report any deviations/exceedances of this permit condition to the Air Pollution Control Program’s Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than the semi-annual monitoring report and annual compliance certification, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

EU0130 –Limestone Handling			
Emission Unit	Description	Manufacturer	EIQ Reference #
EU0130	Limestone Handling: Limestone Unloading (MHDR = 1000 tons/hour; controlled by baghouse with 99% efficiency); Limestone Transfer to Storage Pile (MHDR = 1000 tons/hr, uncontrolled); Limestone Reclaim (MHDR = 800 tons/hr, controlled by baghouse with 99% efficiency); and Limestone Transfer to Day Bins (MHDR = 800 tons/hr, controlled by baghouse with 99% efficiency).	n/a	none

PERMIT CONDITION EU0130-001
 10 CSR 10-6.060 Construction Permits Required
 Construction Permit 012006-019D, October 27, 2008

Emissions Limitations:

- 1) Particulate emissions from the limestone conveyor system (for reclamation of limestone from the storage pile) shall be controlled by a baghouse. [Special Condition 5A]
- 2) Particulate emissions from the limestone day storage bins shall be controlled by baghouses. [Special Condition 5B]

Monitoring and Recordkeeping:

- 1) All baghouses shall be operated and maintained in accordance with the manufacturer’s specifications. Each baghouse shall be equipped with a gauge that indicates pressure drop across the control device. Pressure gauges or a visual display of the pressure data (i.e., monitor or chart) shall be located such that the Department of Natural Resources’ employees may easily observe them during a site visit. Replacement filters for the baghouses shall be kept on hand at all times. The bags shall be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance). [Special Condition 9A]
- 2) KCPL shall monitor and record the operating pressure drop across the baghouses at least once every 24 hours. The operating pressure drop shall be maintained within the design conditions specified by the manufacturer. [Special Condition 9B]
- 3) KCPL shall maintain an operating and maintenance log for the baghouses which shall include the following:
 - a) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and

- b) Maintenance activities, with inspection schedule, repair actions, and replacements, etc. [Special Condition 9C]

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than ten days after the permittee determined that the emission unit(s) exceeded the emission limit.
- 2) Reports of any deviations from monitoring, record keeping and reporting requirements of this permit condition shall be submitted semi-annually, in the semi-annual monitoring report and annual compliance certification, as required by Section IV of this permit.

PERMIT CONDITION EU0130-002

10 CSR 10-6.070 New Source Performance Standards

40 CFR Part 60 Subpart OOO, Standards of Performance for Nonmetallic Mineral Processing Plants

Emission Limitation:

- 1) On and after the date on which the performance test required to be conducted under §60.8 is completed, no owner or operator subject to the provisions of this subpart shall cause to be discharged into the atmosphere from any transfer point on belt conveyors or from any other affected facility (including limestone unloading, limestone reclaim, and limestone transfer to day bins – all controlled by baghouses) stack emissions which: (§60.672(a))
 - a) Contain particulate matter in excess of 0.05 gr/dscm (0.022 gr/dscf); and (§60.672(a)(1))
 - b) Exhibit greater than seven percent opacity. (§60.672(a)(2))
- 2) On and after the sixtieth day after achieving the maximum production rate at which the affected facility will be operated, but not later than 180 days after initial startup as required under §60.11 of this part, no owner or operator subject to the provisions of this subpart shall cause to be discharged into the atmosphere from any transfer point on belt conveyors (including the limestone transfer to storage pile) or from any other affected facility any fugitive emissions which exhibit greater than ten percent opacity, except as provided in §60.672(c), (d), and (e). (§60.672 (b))

Test Methods and Procedures:

- 1) In lieu of the PM test required by 40 CFR Part 60 Subpart OOO, KCPL must conduct an EPA Method 9 visible emissions test of the baghouse stack emissions. The performance test must be conducted while the hopper is operating at a normal production rate, and the duration of the test must be at least 30 minutes. KCPL is required to meet the single bin emission limit of seven percent opacity for emissions from this process. [See Attachment I – Letter from Missouri Department of Natural Resources Enforcement Section]
- 2) KCPL is required to conduct initial performance testing to meet the emission limits. During this testing opacity must be read from all building openings, including the mechanical vents. [See Attachment I – Letter from Missouri Department of Natural Resources Enforcement Section]

Reporting and Recordkeeping:

- 1) The owner or operator of any affected facility shall submit written reports of the results of all performance tests conducted to demonstrate compliance with the standards set forth in §60.672 of this subpart, including reports of opacity observations made using Method 9 to demonstrate compliance with §60.672(b) and reports of observations using Method 22 to demonstrate compliance with §60.672(e). (§60.676(f))

- 2) The Subpart A requirement under §60.7(a)(2) for notification of the anticipated date of initial startup of an affected facility shall be waived for owners or operators of affected facilities regulated under this subpart. (§60.676(h))
- 3) A notification of the actual date of initial startup of each affected facility shall be submitted to the administrator. (§60.676(i))
 - a) For a combination of affected facilities in a production line that begin actual initial startup on the same day, a single notification of startup may be submitted by the owner or operator to the Administrator. The notification shall be postmarked within fifteen days after such date and shall include a description of each affected facility, equipment manufacturer, and serial number of the equipment, if available. (§60.676(i)(1))

EU0140 –Emergency Fire Pump			
Emission Unit	Description	Manufacturer	EIQ Reference #
EU0140	550 hp Emergency Fire Pump; Diesel fired, installed August, 2009	unknown	none

PERMIT CONDITION EU0140-001
 10 CSR 10-6.060 Construction Permits Required
 Construction Permit 012006-019D, October 27, 2008

Operational Limitations:

Use of the emergency fire pump shall not exceed 200 hours per year. [Special Condition 14C]

Monitoring and Recordkeeping:

- 1) The permittee shall maintain an operational log for the emergency fire pump and the emergency that includes a running total of the hours per year this unit is in use. [Special Condition 14C]
- 2) The permittee shall use Attachment G or an equivalent record keeping form to record operating hours of the emergency fire pump.

Reporting:

KCPL shall report to the Air Pollution Control Program’s Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after the day in which records indicate a violation of the operational limitations established by this permit.

PERMIT CONDITION EU0140-002
 10 CSR 10-6.075 Maximum Achievable Control Technology Regulations
 40 CFR Part 63, Subpart ZZZZ – National Emission Standard for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

Initial Notification:

Because the emission unit is a new stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions, the permittee does not have to meet the requirements of this subpart and of Subpart A of this part except for the initial notification requirements of §63.6645(f). [63.6590(b)(i)]

EU0150 –Cooling Towers			
Emission Unit	Description	Manufacturer	EIQ Reference #
EU0150	Cooling towers	unknown	none

PERMIT CONDITION EU0150-001
 10 CSR 10-6.060 Construction Permits Required
 Construction Permit 012006-019D, October 27, 2008

Operational Limitations:

- 1) The cooling towers shall be equipped with high efficiency drift eliminators that are designed to reduce drift to less than 0.0005 percent. Verification of drift loss shall be by manufacturer’s guaranteed drift loss and shall be kept on site and made readily available to Department of Natural Resources’ employees upon request. [Special Condition 8A]
- 2) The cooling tower(s) shall be operated and maintained in accordance with the manufacturer’s specifications. Manufacturer’s specifications shall be kept on site and made readily available to Department of Natural Resources’ employees. [Special Condition 8B]
- 3) The cooling tower water circulation rate shall not exceed 25,800 thousand gallons per hour (=18,834 MMgal/mth = 226,008 MMgal/yr). [Special Condition 8C]
- 4) The total dissolved solids (TDS) concentration in the circulated cooling water shall not exceed a TDS concentration of 15,000 parts per million (ppm). [Special Condition 8E]

Monitoring/Recordkeeping:

- 1) KCPL shall keep records of the monthly and 12-month rolling averages of the amount of water circulated. [Special Condition 8D]
- 2) A TDS sample shall be collected and the results recorded daily to verify the TDS concentration. [Special Condition 8E]
- 3) All records shall be made available to Missouri Department of Natural Resources’ personnel immediately upon request.
- 4) Records shall be kept on site a minimum of five years.

Reporting:

KCPL shall report to the Air Pollution Control Program’s Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after the day in which records indicate a violation of the operational limitations established by this permit.

EU0160 –New Emergency Generator			
Emission Unit	Description	Manufacturer	EIQ Reference #
EU0160	3000 hp Diesel fired CI Emergency Generator; Installed August 2009	unknown	EP-32

PERMIT CONDITION EU0160-001

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

Initial Notification:

- 1) Because the emission unit is a new stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions, the permittee it does not have to meet the requirements of this subpart and of Subpart A of this part except for the initial notification requirements of §63.6645(f). [63.6590(b)(i)]
- 2) The permittee shall submit an Initial Notification including the information in §63.9(b)(2)(i) through (v) and a statement that the new emergency fire pump has no additional requirements and explain the basis of the exclusion (for example, that it operates exclusively as an emergency stationary RICE, has a site rating of more than 500 brake HP and is located at a major source of HAP emissions. [63.6645(f)]

PERMIT CONDITION EU0160-002

10 CSR 10-6.070 New Source Performance Standards
 40 CFR Part 60 Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal
 Combustion Engines

Operational Limitation:

- 1) The owner or operator of the emergency generator must use diesel fuel that meets the requirements of 40 CFR 80.510(b) for nonroad diesel fuel. [60.4207(a)]
- 2) The owner or operator must have installed a non-resettable hour meter prior to the startup of the engine. [60.4209(a)]
- 3) The owner or operator must operate and maintain the emergency generator according to the manufacturer’s written instructions or procedures developed by the owner or operator that are approved by the engine manufacturer. [60.4211(a)]
- 4) The emergency generator may be operated for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by Federal, State, or local government, the manufacturer, the vendor, or the insurance company associated with the engine. Maintenance checks and readiness testing of such units is limited to 100 hours per year. There is no time limit on the use of emergency stationary ICE in emergency situations. Anyone may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that Federal, State, or local standards require maintenance and testing of emergency ICE beyond 100 hours per year. [60.4211(e)]

EU0170 –Existing Emergency Generator

Emission Unit	Description	Manufacturer	EIQ Reference #
EU0170	375 hp Diesel fired CI Emergency Generator; Installed pre 12/19/2002	unknown	EP-33

PERMIT CONDITION EU0170-001

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

Emission/Operation Limitations:

- 1) Any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per year, is prohibited. [63.6640(f)(1)]
- 2) There is no time limit on the use of the emergency generator in emergency situations. [63.6640(f)(1)(i)]
- 3) The owner or operator may operate the emergency generator for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by Federal, State or local government, the manufacturer, the vendor, or the insurance company associated with the generator. Maintenance checks and readiness testing are limited to 100 hours per year. The owner or operator may petition the administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating the Federal, State or local standards require maintenance testing beyond 100 hours per year. [63.6640(f)(1)(ii)]
- 4) The owner or operator may operate the emergency generator up to 50 hours per year in non-emergency situations, but those 50 hours are counted towards the 100 hours per year provided for maintenance and testing. The 50 hours per year for non-emergency situations cannot be used for peak shaving or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity; except that owners and operators may operate the emergency engine for a maximum of 15 hours per year as part of a demand response program if the regional transmission organization or equivalent balancing authority and transmission operator has determined there are emergency conditions that could lead to a potential electrical blackout, such as unusually low frequency, equipment overload, capacity or energy deficiency, or unacceptable voltage level. The engine may not be operated for more than 30 minutes prior to the time when the emergency condition is expected to occur, and the engine operation must be terminated immediately after the facility is notified that the emergency condition is no longer imminent. The 15 hours per year of demand response operation are counted as part of the 50 hours of operation per year provided for non-emergency situations. The supply of emergency power to another entity or entities pursuant to financial arrangement is not limited by this paragraph (f)(1)(iii), as long as the power provided by the financial arrangement is limited to emergency power. [63.6640(f)(1)(iii)]
- 5) The owner or operator must meet the following requirement, except during periods of startup:
 - a) Change oil and filter every 500 hours of operation or annually, whichever comes first;
 - b) Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first;
 - c) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary. [63.6602 and Table 2c]
- 6) During periods of startup, the owner or operator must:
 - a) Minimize the engine's time spent at idle and minimize the engine's startup time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the non-startup emission limitations apply. [63.6602 and Table 2c]
- 7) The owner or operator has the option of utilizing an oil analysis program in order to extend the specified oil change requirement. The oil analysis must be performed at the same frequency specified for changing the oil. The analysis program must at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The condemning limits for

these parameters are as follows: Total Base Number is less than 30 percent of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the engine owner or operator is not required to change the oil. If any of the limits are exceeded, the engine owner or operator must change the oil before continuing to use the engine. The owner or operator must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine. [63.6625(i)]

- 8) The emergency generator must be in compliance with the emission limitations and operating limitations in this subpart that apply at all times. [63.6605 (a)]
- 9) At all times the owner or operator must operate and maintain the emergency generator, including any 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 you 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 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)]
- 10) The owner or operator must comply with the applicable emission limitations and operating limitations no later than May 3, 2013. [63.6595(a)]

Monitoring:

- 1) The owner or operator must operate and maintain the emergency generator according to the manufacturer's emission related written instructions or develop your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. [63.6625(a)]
- 2) The owner or operator must install a non-resettable hour meter if one is not already installed. [63.6625(f)]

Recordkeeping:

- 1) If the permittee must comply with the operating limitations, the permittee must keep the records described in Paragraphs (a)(1) through (a)(5), (b)(1) through (b)(3) and (c) of this section. [§63.6655(a)]
 - a) A copy of each notification and report submitted to comply with this subpart, including all documentation supporting any Notification of Compliance Status that 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 all required maintenance performed on the air pollution control and monitoring equipment. [§63.6655(a)(4)]
 - d) 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 records of the maintenance conducted on the emergency generator in order to demonstrate that the permittee operated and maintained the emergency generator according to their own maintenance plan. [§63.6655(e)]

- 3) The owner or operator must keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The owner or operator must document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation. If the engines are used for demand response operation, the owner or operator must keep records of the notification of the emergency situation, and the time the engine was operated as part of demand response. [§63.6655(f)]
- 4) Records must be in a form suitable and readily available for expeditious review according to §63.10(b)(1). [§63.6660(a)]
- 5) 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)]
- 6) The permittee must keep each record readily accessible in hard copy or electronic form for at least 5 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 the permittee did not meet each operating limitation that applies. These instances are deviations from the operating limitations in this subpart. These deviations must be reported according to the requirements in §63.6650. [§63.6640(b)]
- 2) The permittee shall submit each report in Table 7 of this subpart that applies. [§63.6650(a)]
- 3) Unless the Administrator has approved a different schedule for submission of reports under §63.10(a), the permittee must submit each report by the date in Table 7 of this subpart and according to the requirements in Paragraphs (b)(1) through (b)(9) of this section. [§63.6650(b)]
 - a) For annual Compliance reports, the first Compliance report must cover the period beginning on the compliance date that is specified for the affected source in §63.6595 and ending on December 31. [§63.6650(b)(6)]
 - b) For annual Compliance reports, the first Compliance report must be postmarked or delivered no later than January 31 following the end of the first calendar year after the compliance date that is specified for the affected source in §63.6595. [§63.6650(b)(7)]
 - c) For annual Compliance reports, each subsequent Compliance report must cover the annual reporting period from January 1 through December 31. [§63.6650(b)(8)]
 - d) For annual Compliance reports, each subsequent Compliance report must be postmarked or delivered no later than January 31. [§63.6650(b)(9)]
- 4) The Compliance report must contain the information in Paragraphs (c)(1) through (6) of this section. [§63.6650(c)]
 - a) Company name and address. [§63.6650(c)(1)]
 - b) Statement by a responsible official, with that official's name, title, and signature, certifying the accuracy of the content of the report. [§63.6650(c)(2)]
 - c) Date of report and beginning and ending dates of the reporting period. [§63.6650(c)(3)]
 - d) If the affected source had a malfunction during the reporting period, the compliance report must include the number, duration, and a brief description for each type of malfunction which occurred during the reporting period and which caused or may have caused any applicable emission limitation to be exceeded. The report must also include a description of actions taken by an owner or operator during a malfunction of an affected source to minimize emissions in accordance with §63.6605(b), including actions taken to correct a malfunction. [§63.6650(c)(4)]
 - e) If there are no deviations from any emission or operating limitations that apply to you, a statement that there were no deviations from the emission or operating limitations during the reporting period. [§63.6650(c)(5)]

- 5) For each deviation from an emission or operating limitation that occurs, the Compliance report must contain the information in Paragraphs (c)(1) through (4) of this section and the information in Paragraphs (d)(1) and (2) of this section. [§63.6650(d)]
 - a) The total operating time of the stationary RICE at which the deviation occurred during the reporting period. [§63.6650(d)(1)]
 - b) Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken. [§63.6650(d)(2)]
- 6) Each affected source that has obtained a title V operating permit pursuant to 40 CFR Part 70 or 71 must report all deviations as defined in this subpart in the semi-annual monitoring report required by 40 CFR 70.6 (a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A). If an affected source submits a Compliance report pursuant to Table 7 of this subpart along with, or as part of, the semi-annual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), and the Compliance report includes all required information concerning deviations from any emission or operating limitation in this subpart, submission of the Compliance report shall be deemed to satisfy any obligation to report the same deviations in the semi-annual monitoring report. However, submission of a Compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permit authority. [§63.6650(f)]

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) 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 following is only an excerpt from the regulation or code, and is provided for summary purposes only.

10 CSR 10-6.045 Open Burning Requirements

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

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

10 CSR 10-6.050 Start-up, Shutdown and Malfunction Conditions
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- 1) In the event of a malfunction, which results in excess emissions that exceed one hour, the permittee shall submit to the Director within two business days, in writing, the following information:
 - a) Name and location of installation;
 - b) Name and telephone number of person responsible for the installation;
 - c) Name of the person who first discovered the malfunction and precise time and date that the malfunction was discovered.
 - d) Identity of the equipment causing the excess emissions;
 - e) Time and duration of the period of excess emissions;
 - f) Cause of the excess emissions;
 - g) Air pollutants involved;
 - h) Best estimate of the magnitude of the excess emissions expressed in the units of the applicable requirement and the operating data and calculations used in estimating the magnitude;

- i) Measures taken to mitigate the extent and duration of the excess emissions; and
 - j) Measures taken to remedy the situation that caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations.
- 2) The permittee shall submit the Paragraph 1 information list to the Director in writing at least ten days prior to any maintenance, start-up or shutdown, which is expected to cause an excessive release of emissions that exceed one hour. If notice of the event cannot be given ten days prior to the planned occurrence, it shall be given as soon as practicable prior to the release. If an unplanned excess release of emissions exceeding one hour occurs during maintenance, start-up or shutdown, the Director shall be notified within two (2) business days of the release. In all cases, the notification shall be a written report.
 - 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 fifteen 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 Section 643.151, RSMo.
 - 4) Nothing in this rule shall be construed to limit the authority of the Director or commission to take appropriate action, under Sections 643.080, 643.090 and 643.151, RSMo to enforce the provisions of the Air Conservation Law and the corresponding rule.
 - 5) Compliance with this rule does not automatically absolve the permittee of liability for the excess emissions reported.

10 CSR 10-6.060 Construction Permits Required

The permittee shall not commence construction, modification, or major modification of any installation subject to this rule, begin operation after that construction, modification, or major modification, or begin operation of any installation which has been shut down longer than five years without first obtaining a permit from the permitting authority.

10 CSR 10-6.065 Operating Permits

The permittee shall file a complete application for renewal of this operating permit at least six months before the date of permit expiration. In no event shall this time be greater than eighteen months.

[10 CSR 10-6.065(6)(B)1.A(V)] The permittee shall retain the most current operating permit issued to this installation on-site. [10 CSR 10-6.065(6)(C)1.C(II)] The permittee shall immediately make such permit available to any Missouri Department of Natural Resources' personnel upon request.

[10 CSR 10-6.065(6)(C)3.B]

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

- 1) The permittee shall complete and submit an Emission Inventory Questionnaire (EIQ) annually.
- 2) The permittee may be required by the Director to file additional reports.
- 3) Public Availability of Emission Data and Process Information. Any information obtained pursuant to the rule(s) of the Missouri Air Conservation Commission that would not be entitled to confidential treatment under 10 CSR 10-6.210 shall be made available to any member of the public upon request.

- 4) The permittee shall pay an annual emission fee per ton of regulated air pollutant emitted according to the schedule in the rule. This fee is an emission fee assessed under authority of RSMo. 643.079 to satisfy the requirements of the Federal Clean Air Act, Title V.
- 5) The permittee shall complete required reports on state supplied EIQ forms or in a form satisfactory to the Director and the reports shall be submitted to the Director by April 1 after the end of each reporting period. If the full emissions report is filed electronically via MoEIS, this due date is extended to May 1.
- 6) The reporting period shall end on December 31 of each calendar year. Each report shall contain the required information for each emission unit for the twelve (12)-month period immediately preceding the end of the reporting period.
- 7) The permittee shall collect, record and maintain the information necessary to complete the required forms during each year of operation of the installation.

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

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

10 CSR 10-6.150 Circumvention

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

10 CSR 10-6.170

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

Emission Limitation:

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

10 CSR 10-6.180 Measurement of Emissions of Air Contaminants

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

Title VI – 40 CFR Part 82 Protection of Stratospheric Ozone

- 1) The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
 - a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to §82.106.
 - b) The placement of the required warning statement must comply with the requirements pursuant to §82.108.
 - c) The form of the label bearing the required warning statement must comply with the requirements pursuant to §82.110.
 - d) No person may modify, remove, or interfere with the required warning statement except as described in §82.112.
- 2) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B:
 - a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
 - b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
 - c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
 - d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record keeping requirements pursuant to §82.166. ("MVAC-like" appliance as defined at §82.152).
 - e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to §82.156.
 - f) Owners/operators of appliances normally containing fifty or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.
- 3) If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR Part 82, Subpart A, Production and Consumption Controls.
- 4) If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air

conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.

- 5) The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR Part 82, Subpart G, Significant New Alternatives Policy Program.
Federal Only - 40 CFR Part 82

10 CSR 10-6.280 Compliance Monitoring Usage
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|--|
| <p>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:</p> <ul style="list-style-type: none">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; andc) Any other monitoring methods approved by the Director. <p>2) Any credible evidence may be used for the purpose of establishing whether a permittee has violated or is in violation of any such plan or other applicable requirement. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred by a permittee:</p> <ul style="list-style-type: none">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; andc) Compliance test methods specified in the rule cited as the authority for the emission limitations. <p>3) The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:</p> <ul style="list-style-type: none">a) Applicable monitoring or testing methods, cited in:<ul style="list-style-type: none">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"; orb) Other testing, monitoring, or information gathering methods, if approved by the Director, that produce information comparable to that produced by any method listed above. |
|--|

V. General Permit Requirements

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

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

This permit is issued for a term of five years, commencing on the date of issuance. This permit will expire at the end of this period unless renewed.

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

- 1) Record Keeping
 - a) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
 - b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any Missouri Department of Natural Resources' personnel upon request.
- 2) Reporting
 - a) All reports shall be submitted to the Air Pollution Control Program's Enforcement Section, P. O. Box 176, Jefferson City, Missouri 65102.
 - b) The permittee shall submit a report of all required monitoring by:
 - i) October 1st for monitoring which covers the January through June time period, and
 - ii) April 1st for monitoring which covers the July through December time period.
 - iii) Exception. Monitoring requirements which require reporting more frequently than semi-annually shall report no later than thirty days after the end of the calendar quarter in which the measurements were taken.
 - c) Each report shall identify any deviations from emission limitations, monitoring, record keeping, reporting, or any other requirements of the permit, this includes deviations or Part 64 exceedances.
 - d) Submit supplemental reports as required or as needed. Supplemental reports are required no later than ten days after any exceedance of any applicable rule, regulation or other restriction. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
 - i) Notice of any deviation resulting from an emergency (or upset) condition as defined in Paragraph (6)(C)7.A of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two working days after the date on which the emission limitation is exceeded due to the emergency, if the permittee wishes to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and the permittee can identify the cause(s) of the emergency. The permitted installation must show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or requirements in the permit. The notice must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.

- ii) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.
- iii) Any other deviations identified in the permit as requiring more frequent reporting than the permittee's semi-annual report shall be reported on the schedule specified in this permit, and no later than ten days after any exceedance of any applicable rule, regulation, or other restriction.
- e) Every report submitted shall be certified by the responsible official, except that, if a report of a deviation must be submitted within ten days after the deviation, the report may be submitted without a certification if the report is resubmitted with an appropriate certification within ten days after that, together with any corrected or supplemental information required concerning the deviation.
- f) The permittee may request confidential treatment of information submitted in any report of deviation.

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

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

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

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

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

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

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

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

This facility was issued Phase II Acid Rain Permit OP2010-007, on February 3, 2010.

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)3 Compliance Requirements

- 1) Any document (including reports) required to be submitted under this permit shall contain a certification signed by the responsible official.
- 2) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized officials of the Missouri Department of Natural Resources, or their authorized agents, to perform the following (subject to the installation's right to seek confidential treatment of information submitted to, or obtained by, the Air Pollution Control Program):
 - a) Enter upon the premises where a permitted installation is located or an emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
 - b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - c) Inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
 - d) As authorized by the Missouri Air Conservation Law, Chapter 643, RSMo or the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the terms of this permit, and all applicable requirements as outlined in this permit.
- 3) All progress reports required under an applicable schedule of compliance shall be submitted semi-annually (or more frequently if specified in the applicable requirement). These progress reports shall contain the following:

- a) Dates for achieving the activities, milestones or compliance required in the schedule of compliance, and dates when these activities, milestones or compliance were achieved, and
 - b) An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measures adopted.
- 4) The permittee shall submit an annual certification that it is in compliance with all of the federally enforceable terms and conditions contained in this permit, including emissions limitations, standards, or work practices. These certifications shall be submitted annually by April 1st, unless the applicable requirement specifies more frequent submission. These certifications shall be submitted to EPA Region VII, 901 North 5th Street, Kansas City, KS 66101, as well as the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102. All deviations and Part 64 exceedances and excursions must be included in the compliance certifications. The compliance certification shall include the following:
- a) The identification of each term or condition of the permit that is the basis of the certification;
 - b) The current compliance status, as shown by monitoring data and other information reasonably available to the installation;
 - c) Whether compliance was continuous or intermittent;
 - d) The method(s) used for determining the compliance status of the installation, both currently and over the reporting period; and
 - e) Such other facts as the Air Pollution Control Program will require in order to determine the compliance status of this installation.

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

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

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

- 1) An emergency or upset as defined in 10 CSR 10-6.065(6)(C)7.A shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emissions limitations. To establish an emergency- or upset-based defense, the permittee must demonstrate, through properly signed, contemporaneous operating logs or other relevant evidence, the following:
 - a) That an emergency or upset occurred and that the permittee can identify the source of the emergency or upset,

- b) That the installation was being operated properly,
 - c) That the permittee took all reasonable steps to minimize emissions that exceeded technology-based emissions limitations or requirements in this permit, and
 - d) That the permittee submitted notice of the emergency to the Air Pollution Control Program within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.
- 2) Be aware that an emergency or upset shall not include noncompliance caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

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

An installation that has been issued a Part 70 operating permit is not required to apply for or obtain a permit revision in order to make any of the changes to the permitted installation described below if the changes are not Title I modifications, the changes do not cause emissions to exceed emissions allowable under the permit, and the changes do not result in the emission of any air contaminant not previously emitted. The permittee shall notify the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, KS 66101, 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's Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, KS 66101, describing the changes to be made, the date on which the change will occur, and any changes in emission and any permit terms and conditions that are affected. The permittee shall maintain a copy of the notice with the permit, and the Air Pollution Control Program shall place a copy with the permit in the public file. Written notice shall be provided to the EPA and the Air Pollution Control Program as above at least seven days before the change is to be made. If less than seven days notice is provided because of a need to respond more quickly to these unanticipated conditions, the permittee shall provide notice to the EPA and the Air Pollution Control Program as soon as possible after learning of the need to make the change.
 - b) The permit shield shall not apply to these changes.

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

- 1) Except as noted below, the permittee may make any change in its permitted operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Insignificant activities listed in the application, but not otherwise addressed in or prohibited by this permit, shall not be considered to be constrained by this permit for purposes of the off-permit provisions of this section. Off-permit changes shall be subject to the following requirements and restrictions:
 - a) The change must meet all applicable requirements of the Act and may not violate any existing permit term or condition; the permittee may not change a permitted installation without a permit revision if this change is subject to any requirements under Title IV of the Act or is a Title I modification;
 - b) The permittee must provide written notice of the change to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, KS 66101, no later than the next annual emissions report. This notice shall not be required for changes that are insignificant activities under 10 CSR 10-6.065(6)(B)3. This written notice shall describe each change, including the date, any change in emissions, pollutants emitted and any applicable requirement that would apply as a result of the change.
 - c) The permittee shall keep a record describing all changes made at the installation that result in emissions of a regulated air pollutant subject to an applicable requirement and the emissions resulting from these changes; and
 - d) The permit shield shall not apply to these changes.

10 CSR 10-6.020(2)(R)12 Responsible Official

The application utilized in the preparation of this permit was signed by Thomas J. Mackin, Plant Manager. 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 thirty days of the change. The notification shall include the name and title of the new person assigned by the source owner or operator to represent and bind the installation in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible person that were used in the establishment of limiting permit conditions on this permit will continue to be binding on the installation until such time that a revision to this permit is obtained that would change said representations, agreements and covenants.

10 CSR 10-6.065(6)(E)6 Reopening-Permit for Cause

This permit may be reopened for cause if:

- 1) The Missouri Department of Natural Resources receives notice from the Environmental Protection Agency (EPA) that a petition for disapproval of a permit pursuant to 40 CFR § 70.8(d) has been granted, provided that the reopening may be stayed pending judicial review of that determination,
- 2) The Missouri Department of Natural Resources or EPA determines that the permit contains a material mistake or that inaccurate statements were made which resulted in establishing the emissions limitation standards or other terms of the permit,
- 3) Additional applicable requirements under the Act become applicable to the installation; however, reopening on this ground is not required if—:
 - a) The permit has a remaining term of less than three years;

- b) The effective date of the requirement is later than the date on which the permit is due to expire;
or
- c) The additional applicable requirements are implemented in a general permit that is applicable to the installation and the installation receives authorization for coverage under that general permit,
- 4) The installation is an affected source under the acid rain program and additional requirements (including excess emissions requirements), become applicable to that source, provided that, upon approval by EPA, excess emissions offset plans shall be deemed to be incorporated into the permit;
or
- 5) The Missouri Department of Natural Resources or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

10 CSR 10-6.065(6)(E)1.C Statement of Basis
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This permit is accompanied by a statement setting forth the legal and factual basis for the permit conditions (including references to applicable statutory or regulatory provisions). This Statement of Basis, while referenced by the permit, is not an actual part of the permit.

VI. Attachments

Attachments follow.

ATTACHMENT A

TITLE IV: ACID RAIN PERMIT

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

Installation Name: Kansas City Power & Light (Iatan), ORIS Code: 6065
Project Number: 2009-06-064
Permit Number: OP2010-007
Unit IDs: 1 and 2 (Under Construction)
Effective Dates: January 1, 2010 through December 31, 2014

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

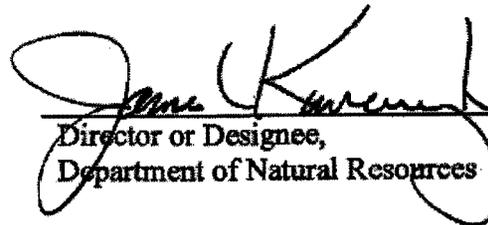
The number of allowances actually held by an affected source in a unit account may differ from the number allocated by the United States Environmental Protection Agency. Pursuant to 40 CFR 72.84, *Automatic permit amendment*, this does not necessitate a revision to any unit SO₂ allowance allocations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

Pursuant to 40 CFR Part 76, the Missouri Department of Natural Resources Air Pollution Control Program approves the Phase II NO_x Compliance Plan submitted for these units, effective for calendar years 2010 through 2014. Unit 2, which is currently under construction, will be subject to this permit upon completion. In addition to complying with these NO_x limits, these units shall comply with all other applicable requirements of 40 CFR Part 76, including the requirement to reapply for a NO_x compliance plan and requirements covering excess emissions.

This acid rain permit is effective for the five-year period shown above, per 40 CFR 72.69, *Issuance and effective date of acid rain permits*. The designated representative must submit an application for renewal of this permit no later than June 30, 2014, per 40 CFR 72.30, *Requirement to apply*, and in conjunction with the operating permit renewal application.

FEB 03 2010

Date


Director or Designee,
Department of Natural Resources

Facility (Source) Name (from STEP 1)

Acid Rain - Page 2

Permit Requirements

STEP 3

Read the standard requirements.

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

Monitoring Requirements

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

Sulfur Dioxide Requirements

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

Facility (Source) Name (from STEP 1)

Acid Rain - Page 3

Sulfur Dioxide Requirements, Cont'd.

STEP 3, Cont'd.

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

Nitrogen Oxides Requirements

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

Excess Emissions Requirements

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

Recordkeeping and Reporting Requirements

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

Facility (Source) Name (from STEP 1)

Acid Rain - Pag

Recordkeeping and Reporting Requirements. Cont'd.

STEP 3, Cont'd.

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

Liability

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

Effect on Other Authorities

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

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

Facility (Source) Name (from STEP 1)

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Effect on Other Authorities. Cont'd.

STEP 3, Cont'd.

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

Certification

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

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

Name Scott Heldtbrink, D.R.	
Signature <i>Scott Heldtbrink</i>	Date <i>6/16/09</i>



United States
Environmental Protection Agency
Acid Rain Program

OMB No. 2060-0266

Phase II NO_x Compliance Plan

Page 11 of 21

For more information, see instructions and refer to 40 CFR 70.9

This submission is: New Revised (Revised)

STEP 1
Indicate plant name, state, and CRIS code from NAQS, if applicable.

Plant Name IATAN	State MO	CRIS Code 6065
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STEP 2

Identify each affected Group 1 and Group 2 boiler using the boiler ID# from NAQS, if applicable. Indicate boiler type: "CB" for oil burner, "CY" for cyclone, "DB" for dry bottom wet-fired, "V" for horizontally fired, "V" for vertically fired, and "WB" for wet bottom. Indicate the compliance option selected for each unit.

Boiler ID#	Type								
1	DBW								

(a) Standard annual average emission limitation of 0.25 lb/MMBtu (for Group 1 dry bottom wet-fired boilers)	<input checked="" type="checkbox"/>	<input type="checkbox"/>							
(a) Standard annual average emission limitation of 0.25 lb/MMBtu (for Group 1 temporarily fired boilers)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(c) EPA-approved early start-up test cycle (see instructions for test cycle and test procedure)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(a) Standard annual average emission limitation of 0.25 lb/MMBtu (for Group 1 dry bottom wet-fired boilers)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(a) Standard annual average emission limitation of 0.25 lb/MMBtu (for Group 1 temporarily fired boilers)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(c) Standard annual average emission limitation of 0.25 lb/MMBtu (for oil burner boilers)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(c) Standard annual average emission limitation of 0.25 lb/MMBtu (for cyclone boilers)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(b) Standard annual average emission limitation of 0.30 lb/MMBtu (for vertically fired boilers)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(d) Standard annual average emission limitation of 0.30 lb/MMBtu (for wet bottom boilers)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(E) NO _x Averaging Plan (include NO _x Averaging form)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(C) Common stack pursuant to 40 CFR 70.9(a)(2)(ii) (check the standard emission limitation box above for each alternative limitation applicable to any unit utilizing stack)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(D) Common stack pursuant to 40 CFR 70.9(a)(2)(iii) (check the standard emission limitation box above for each alternative limitation applicable to any unit utilizing stack)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Plant Name (from Step 1) **IATAN**

NO_x Compliance - Page 2
 Page 21 of 22

STEP 2, cont'd.

ID#	ID#	ID#	ID#	ID#	ID#
Type	Type	Type	Type	Type	Type

- (m) EPA-approved common stack gas monitoring method pursuant to 40 CFR 76.5 (MOPUC), (MOPUC), or (MOPUC)
- (n) AEL (includes Phase II AEL) demonstration period, Final AEL, Pollution, or AEL Removal form as appropriate
- (o) Petition for AEL demonstration period or final AEL under review by U.S. EPA or demonstration period ongoing
- (p) Recovering emissions plan approved or under review

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

Standard Requirements

General. This source is subject to the standard requirements in 40 CFR 72.9 (consistent with 40 CFR 76.8(e)(1)(ii)). These requirements are listed in this source's Acid Rain Permit.

Special Provisions for Early Election Units

Nitrogen Oxides. A unit that is governed by an approved early election plan shall be subject to an emissions limitation for NO_x, as provided under 40 CFR 76.8(a)(2) except as provided under 40 CFR 76.8(a)(3)(ii).

Liability. The owners and operators of a unit governed by an approved early election plan shall be liable for any violation of the plan or 40 CFR 76.8 at that unit. The owners and operators shall be liable, beginning January 1, 2000, for fulfilling the obligations specified in 40 CFR Part 77.

Termination. An approved early election plan shall be in effect only until the earlier of January 1, 2008 or January 1 of the calendar year for which a termination of the plan takes effect. If the designated representative of the unit under an approved early election plan fails to demonstrate compliance with the applicable emissions limitation under 40 CFR 76.5 for any year during the period beginning January 1 of the first year the early election takes effect and ending December 31, 2007, the permitting authority will terminate the plan. The termination will take effect beginning January 1 of the year after the year for which there is a failure to demonstrate compliance, and the designated representative may not submit a new early election plan. The designated representative of the unit under an approved early election plan may terminate the plan any year prior to 2008 but may not submit a new early election plan. In order to terminate the plan, the designated representative must submit a notice under 40 CFR 72.40(d) by January 1 of the year for which the termination is to take effect. If an early election plan is terminated any year prior to 2000, the unit shall meet, beginning January 1, 2000, the applicable emissions limitation for NO_x for Phase II units with Group 1 boilers under 40 CFR 76.7. If an early election plan is terminated on or after 2000, the unit shall meet, beginning on the effective date of the termination, the applicable emissions limitation for NO_x for Phase II units with Group 1 boilers under 40 CFR 76.7.

Certification

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

Name **SCOTT HEIDTBRINK, D.R.**
 Signature *Scott Heidtbrink* **6/14/09**

ATTACHMENT C
Method 22 (Outdoor) Observation Log

This record keeping sheet or an equivalent form may be used for the record keeping requirements of 10 CSR 10-6.220, *Restriction of Emission of Visible Air Contaminants*.

Method 22 (Outdoor) Observation Log		
Emission Unit		
Observer	Date	
Sky Conditions		
Precipitation		
Wind Direction	Wind Speed	
Sketch process unit: Indicate the position relative to the source and sun; mark the potential emission points and/or the observing emission points.		
Observation Clock Time	Observation Period Duration (minute: second)	Accumulative Emission Time (minute: second)
Begin Observation		
End Observation		

ATTACHMENT E
Method 9 Opacity Emissions Observations

This record keeping sheet or an equivalent form may be used for the record keeping requirements of 10 CSR 10-6.220, *Restriction of Emission of Visible Air Contaminants*.

Method 9 Opacity Emissions Observations								
Company					Observer			
Location					Observer Certification Date			
Date					Emission Unit			
Time					Control Device			
Hour	Minute	Seconds				Steam Plume (check if applicable)		Comments
		0	15	30	45	Attached	Detached	
	0							
	1							
	2							
	3							
	4							
	5							
	6							
	7							
	8							
	9							
	10							
	11							
	12							
	13							
	14							
	15							
	16							
	17							
	18							
SUMMARY OF AVERAGE OPACITY								
Set Number	Time				Opacity			
	Start	End	Sum	Average				

Readings ranged from _____ to _____ % opacity.

Was the emission unit in compliance at the time of evaluation? _____
 YES NO Signature of Observer _____

ATTACHMENT H

**TITLE V: CLEAN AIR INTERSTATE RULE
(CAIR) PERMIT**

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

Installation Name: Kansas City Power and Light -Iatan Generating Station, ORIS Code: 006065

Project Number: 2007-07-005, **Permit Number:** OP2009-009A

Unit IDs: Unit 1

Effective Dates: March 23, 2009 through March 22, 2014

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

This CAIR Permit applies only to Unit 1 at KCPL Iatan Generating Station, plant 165-0007.

This CAIR permit is effective for the five-year period shown above. The designated representative must submit an application for renewal of this permit no later than September 23, 2013, and in conjunction with the operating permit renewal application.

Date

Director or Designee,
Department of Natural Resources

Plant Name (from Step 1) Iatan Generating Station

**STEP 3,
continued**

(b) Monitoring, reporting, and recordkeeping requirements.

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

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

(c) Nitrogen oxides emissions requirements.

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

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

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

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

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

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

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

Sulfur dioxide emission requirements.

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

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

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

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

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

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

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

Nitrogen oxides ozone season emissions requirements.

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

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

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

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

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

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

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

Plant Name (from Step 1) Iatan Generating Station

**STEP 3,
continued**

(d) Excess emissions requirements.

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

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

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

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

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

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

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

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

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

(e) Recordkeeping and Reporting Requirements.

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

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

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

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

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

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

(f) Liability.

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

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

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

Plant Name (from Step 1)	IATAN
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CAIR Permit Application
Page 4

**STEP 3,
continued**

(g) Effect on Other Authorities.

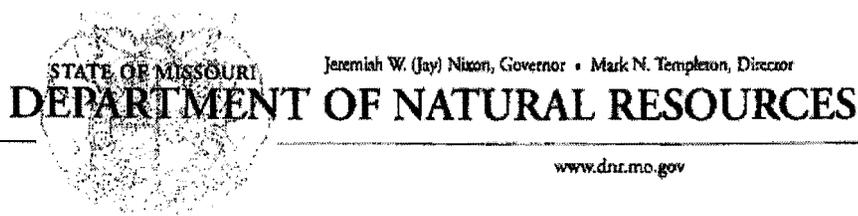
No provision of the CAIR NO_x Annual Trading Program, CAIR SO₂ Trading Program, and CAIR NO_x Ozone Season Trading Program (as applicable), a CAIR permit application, a CAIR permit, or an exemption under § 96.105, §96.205, and §96.305 (as applicable) shall be construed as exempting or excluding the owners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

Certification

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

Name	SCOTT HEIDTBRINK	
Signature	<i>Scott Heidtbrink</i>	Date 11-18-10

ATTACHMENT I



AUG 26 2010

Mr. Dan Haas
Kansas City Power & Light Company
P.O. Box 418679
Kansas City, MO 64141-9679

RE: Iatan Station Construction Permit #012006-019D
Limestone Handling Performance Testing Requirements

Dear Mr. Haas:

The Missouri Department of Natural Resources' Air Pollution Control Program (APCP) has received Kansas City Power & Light Companies (KCP&L) request to waive the initial particulate matter (PM) performance testing requirements specified in 40 CFR Part 60, Subpart OOO — "Standards of Performance for Non-metallic Mineral Processing Plants." KCP&L is required to conduct initial performance testing to measure stack gas emissions from a reclaim hopper and its associated conveyor, and from two silos enclosed in the limestone preparation building and their associated conveyors and ball mills. These affected facilities are located at KCP&L's Iatan Station near Weston, MO.

I understand the transfer point from the reclaim hopper to the conveyor belt is controlled by a baghouse, and this transfer point is located underground. I further understand that the hopper is operated intermittently throughout the day, and the duration of each operation is less than 30 minutes.

The APCP believes that the intermittent operation of the hopper precludes the ability to perform a meaningful PM test via Environmental Protection Agency (EPA) Method 5 or 17. In addition, PM emissions from a single hopper and conveyor belt, operated intermittently, should be minimal. Therefore, the APCP hereby approves KCP&L's request to waive the PM testing requirement. In lieu of the PM test, KCP&L must conduct an EPA Method 9 visible emissions test of the baghouse stack emissions in order to demonstrate compliance with the 40 CFR Part 60, Subpart OOO initial performance testing requirements. The performance test must be conducted while the hopper is operating at a normal production rate, and the duration of the test must be at least 30 minutes. KCP&L is required to meet the single bin emission limit of 7% opacity for emissions from this process.

I understand the limestone preparation building contains two silos where limestone is stored for later use by the scrubber system. Limestone is transported via conveyor belts to the silos, and the limestone is also processed through ball mills; all transfer points are fully enclosed and located inside the building. I understand the limestone is moist during this process and emissions are controlled by two fabric filters, one for each silo operation, and the fabric filters vent emissions inside the building.

Mr. Dan Haas
Page Two

Your letter indicates the silos are filled no more than once per day, and that operation takes no more than 30 to 45 minutes. Your letter also indicates the building has vents as defined in 40 CFR Part 60, Subpart 000.

40 CFR Part 60, Subpart 000 states that facilities enclosed in a building must meet their applicable emission limits as specified in tables 2 and 3 of the subpart. In lieu of conducting a performance test on each facility enclosed in a building, owners and operators may choose to comply with alternative emission limits as follows:

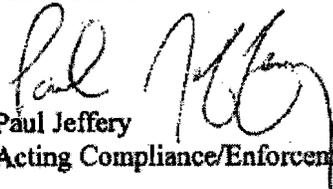
- 40 CFR 60.672(e)(1) – Fugitive emissions from the building openings (except for vents as defined in 60.671) must not exceed 7% opacity.
- 40 CFR 60.672(e)(2) – Vents (as defined in 60.671) in the building must meet the applicable stack emission limits and compliance requirements in Table 2 of this subpart.

As the operation of the limestone handling equipment in the limestone preparation building is limited, and the limestone is moist during operations, the APCP believes little meaningful data would result from attempting to conduct an EPA Method 5 or 17 PM emissions test on the building vents. Therefore, the APCP hereby approves KCP&L's request to waive the PM testing requirement. KCP&L is however required to conduct initial performance testing to meet the emission limit specified in 40 CFR 60.672(e)(1) referenced above. During this testing opacity must be read from all building openings, including the mechanical vents.

We appreciate your cooperation in this matter. If you have any further questions regarding this issue, please contact Mr. Richard Swartz at the Department's Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, or by phone at (573) 751-4817.

Sincerely,

AIR POLLUTION CONTROL PROGRAM


Paul Jeffery
Acting Compliance/Enforcement Section Chief

PJ:rstt

c: Mr. Scott Postma, U.S. EPA, Region VII
Mr. Richard Vani, Kansas City Regional Office
Source file: 165-0007

STATEMENT OF BASIS

Permit Reference Documents

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

- 1) Part 70 Operating Permit Application, received April 26, 2004;
- 2) 2009 Emissions Inventory Questionnaire, received May 28, 2010;
- 3) Part 70 Operating Permit Application for Significant Modification, received October 5, 2009;
- 4) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition;
- 5) Construction Permit 012006-019D, Issued October 27, 2008; and
- 6) Phase II Acid Rain Permit OP2010-007, Issued February 3, 2010.

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 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 is not applicable because the installation is in an ozone attainment area.

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

This rule no longer applied to the Unit 1 boiler.

Construction Permit Revisions

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

Kansas City Power and Light Company has been issued the following construction permits:

Permit Number	Description
1293-004	A Section (5) permit involving a decrease to the amount of power delivered to the Unit 1 electrostatic precipitator. (ESP is no longer operational)
012006-019	A Section (8) permit for installation of a pulverized coal boiler and associated pollution control equipment (Iatan Unit 2), a fuel-oil fired auxiliary boiler, emergency fire pump, a fuel oil storage tank and a combustion by-product landfill. Modification of an existing electrical utility steam generating unit (Iatan Unit 1) to upgrade the pollution control system and increase the heat input rate.

Permit Number	Description
012006-019A	An amendment to permit number 012006-019 specifying that the Unit 2 boiler will be a supercritical boiler. The amendment was made in accordance with the stipulation agreement between KCPL and the Sierra Club.
012006-019B	An amendment to permit number 012006-019A incorporating the following Unit 1 modifications: replacement of existing low-NO _x burners, addition of over-fire air ports, turbine overhaul/partial replacement work, increase of economizer surface area and replacement/modification of the ash handling system. This amendment also modified the emission limitations for NO _x , SO ₂ and sulfuric acid mist in accordance with the stipulation agreement between KCPL and the Sierra Club.
102006-019C	An amendment to permit number 012006-019B that added a third sentence to Special Conditions 2.E.12 and 3.E.12, for the intended purpose of clarifying the sulfuric acid mist emission limitations for the Unit 1 and Unit 2 boilers.
102006-019D	An amendment to permit number 012006-019C to make changes including: relocating the Unit 1 and 2 Boiler stacks; relocating the facility fence line; relocate emergency fire pump engines and increase capacity; add cells to cooling tower and decrease circulation rate; change new building dimensions and locations; increase coal storage pile areas; change landfill dimensions and emission rates; material handling changes; change capacity of coal handling sources; reconfigure haul roads and change permitted haul road emissions; and modify the Unit 1 Boiler feedwater pump

Construction Permit 012006-019D, October 27, 2008

The following special conditions of Construction Permit 012006-019D were not included in this operating permit:

Special Condition 1D: This condition states that the coal storage, handling and processing shall be conducted in compliance with 40 CFR Part 60 Subpart Y. Since Subpart Y is included as a permit condition in this permit it was considered unnecessary to include this special condition.

Special Condition 1E: This condition states that the coal storage, handling and processing shall be conducted in compliance with 10 CSR 10-6.170. Since this regulation is included in the core permit requirements section of the operating permit, it was considered unnecessary to include this special condition.

Special Condition 2B, 2C and 2D: These special conditions require the permittee to submit within 120 of startup, the design specifications and operations and maintenance manuals for the SCR, flue gas desulfurization system and fabric filtration (baghouse) system for the Unit 1 Boiler. The permittee has fulfilled these requirements and the conditions were modified in the operating permit to require the permittee to maintain this information on site.

Special Conditions 6A, 6B, 6C, and 6D: These special conditions were not included because they apply to the oil-fired Auxiliary boiler. While this boiler was included in the construction permit the facility never installed it.

Special Conditions 12A, 12B, 12C, 12D, 12E, 12F and 12G were not included in this operating permit modification because they contain requirements for initial performance tests which have been completed. All required reports were submitted on time.

Special conditions 7A and 7B were not included in this operating permit because they apply to a 500,000 gallon fuel oil storage tank that was never installed.

As a part of the Significant Modification to Operating Permit OP2009-009, the following special conditions are being added to the permit as construction is complete on the added units:

- Special Condition 3 (A through F): This special condition applies to the Unit 2 boiler.
- Special Condition 7 (A and B) and Special Condition 14F: These special conditions apply to the fuel oil storage tank.
- Special Condition 17 (A through E): This condition requires post construction ambient monitoring.
- Special Condition 20: This condition limited the heat input rate of Unit 1 to 6,600 MMBtu per hour until the new pollution controls are in place and fully operations which will then allow the boiler up to 7,800 MMBtu per hour. This special condition was changed to state that the Unit 1 Boiler heat input rate shall not exceed 7,800 MMBtu per hour.

New Source Performance Standards (NSPS) Applicability

40 CFR Part 60 Subpart D, *Standards of Performance for Fossil-Fuel-Fired Steam Generating Units for Which Construction is Commenced After August 17, 1971*

Currently Emission Unit EU0010 – Boiler 1 is subject to this subpart because it has a heat input greater than 250 MMBtu per hour and was constructed after August 17, 1971, but before September 18, 1978. Although the control devices for Boiler 1 will be upgraded it will remain subject to this subpart rather than becoming subject to Subpart Da because these upgrades will not be considered a “modification.” This is due to the fact that the emissions from this unit will decrease as a result of the upgraded controls on SO₂, NO_x and PM emissions.

40 CFR Part 60 Subpart Y, *Standards of Performance for Coal Preparation Plants*

Emission Units EU0030 through EU0070 – Coal Handling, Transfer and Storage, are subject to this subpart.

40 CFR Part 60 Subpart IIII, *Standards of Performance for Stationary Compression Ignition Internal Combustion Engines*, applies to Emission Unit EU0160 New Emergency Generator. It does not apply to Emission Unit EU01040 New Fire Pump because according to §60.4200(a)(1)(ii), the subpart applies to fire pump engines with a model year later than what is listed in Table 3 of the subpart, which for this 510 hp fire pump is 2009. The model year of the

fire pump is 2008, therefore this subpart was not applied to this emission unit. Subpart IIII also does not apply to Emission Unit EU0170 Existing Fire Pump because It was not manufactured before the applicable date.

Maximum Achievable Control Technology (MACT) Applicability

40 CFR Part 63 Subpart Q *National Emission Standards for Hazardous Air Pollutants for Industrial Process Cooling Towers* does not apply to Emission Unit EU0150 Cooling Towers because the cooling towers will not be operated with chromium based water treatment chemicals.

40 CFR Part 63, Subpart ZZZZ – *National Emission Standard for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines* applies to Emission Unit EU0140 Emergency Fire Pump, EU0160 New Emergency Generator, and EU0170 Existing Emergency Generator.

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

In the permit application and according to Air Pollution Control Program records, there was no indication that any Missouri Air Conservation Law, Asbestos Abatement, 643.225 through 643.250;

10 CSR 10-6.080, Emission Standards for Hazardous Air Pollutants, Subpart M, National Standards for Asbestos; and 10 CSR 10-6.250, Asbestos Abatement Projects - Certification, Accreditation, and Business Exemption Requirements apply to this installation. The installation is subject to these regulations if they undertake any projects that deal with or involve any asbestos containing materials. None of the installation's operating projects underway at the time of this review deal with or involve asbestos containing material. Therefore, the above regulations were not cited in the operating permit. If the installation should undertake any construction or demolition projects in the future that deal with or involve any asbestos containing materials, the installation must follow all of the applicable requirements of the above rules related to that specific project.

Compliance Assurance Monitoring (CAM) Applicability

40 CFR Part 64, *Compliance Assurance Monitoring (CAM)*

The CAM rule applies to each pollutant specific emission unit that:

- Is subject to an emission limitation or standard, and
- Uses a control device to achieve compliance, and
- Has pre-control emissions that exceed or are equivalent to the major source threshold.

40 CFR Part 64 is not applicable to EU0010 – Boiler 1 because it is subject to 40 CFR Part 60 Subpart D and the requirements of Construction Permit 012006-019D, issued October 27, 2008, which specify a continuous compliance determination method (the use of CEMS for particulate matter monitoring) for each unit.

Other Regulatory Determinations

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

This regulation does not apply to EU0030 through EU0070 because these units are subject to 40 CFR Part 60 Subpart Y. Emission Unit EU0080 is an enclosed process and thus qualifies as an area source and therefore is not subject to this regulation. The special conditions of Construction Permit 012006-019D require that emissions from Emission Unit EU0090-Fly Ash Silo be controlled by a baghouse. This control device make this unit a point source and thus subject to 10 CSR 10-6.400. The following calculation demonstrates compliance with the particulate matter emission limit for this unit. No monitoring of the baghouse is required to ensure compliance because the uncontrolled emissions for this unit remain under the emission limit.

MHDR = 22.0 ton/hr

Emission Factor = .05 lb/ton

Control Device Efficiency = 99%

Controlled Emissions = $22.0 \times .05 \times ((100-99)/100) = 0.01 \text{ lb/hr}$

Uncontrolled Emissions = $20.93 \times .05 = 1.05 \text{ lb/ton}$

Emission Limit = $4.1 \times (22)^{0.67} = 32.52 \text{ lb/hr}$

Emission Unit EU0130 – Limestone Handling is not subject to this rule because it is subject to 40 CFR Part 60 Subpart OOO.

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

This regulation does not apply to EU0010 – Boiler 1 because it is subject to 40 CFR Part 60 Subpart D.

This regulation does not apply to EU0030 through EU0070 because these emission units are subject to 40 CFR Part 60, Subpart Y, *Standards of Performance for Coal Preparation Plants*. This federal regulation establishes a twenty percent opacity limit for these units. This regulation does not apply to EU0130 because it is subject to 40 CFR Part 60, Subpart OOO.

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

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

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

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

Prepared by:

Jill Wade, P.E.
Environmental Engineer

CERTIFIED MAIL: 70093410000190189442
RETURN RECEIPT REQUESTED

Mr. Thomas J. Mackin
Plant Manger
KCPL - Iatan Generating Station
20250 Highway 45 North
Weston, MO 64098

Re: Iatan Generating Station – KCPL, 165-0007
Permit Number: **OP2009-009A**

Dear Mr. Mackin:

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

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

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

Sincerely,

AIR POLLUTION CONTROL PROGRAM

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

MJS:jwk

Enclosures

c: Kansas City Regional Office
PAMS File: 2009-10-017