



Jeremiah W. (Jay) Nixon, Governor • Sara Parker Pauley, Director

## DEPARTMENT OF NATURAL RESOURCES

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**JUN 22 2016**

Mr. Martin Kasper  
Environmental Compliance Specialist  
University of Missouri (MU) Power Plant  
Energy Management  
417 South Fifth Street  
Columbia, MO 65211

RE: New Source Review Permit Amendment - Permit Number: 092015-001A  
Project Number: 2015-12-024; Installation Number: 019-0004

Dear Mr. Kasper:

The Ash System Repairs project replaces the ash silo unloading spout, vent fan, silo bin vent, primary ash separator and silo unloading access platform with similar equipment. The primary ash separator and ash silo unloading spout are being replaced because of typical degradation of the equipment. The ash silo unloading vent fan and bin vent will have a larger air volume capacity to compensate for the originally installed and marginally designed equipment.

This project is being combined with the DSI System project (Permit # 092015-001) due to the proximity in timing. Therefore, in this amendment, the potential emissions for the West Silo were already calculated in Permit No. 092015-001. Emissions are calculated on a pound per ton basis. Even though there is a larger air volume, the throughput is not increasing and there is no potential emission increase.

This project is also being updated to include the particulate HAPs emissions total. There are trace element concentrations in coal fly ash as stated in Table 6, "Reuse Options For Coal Fired Power Plant Bottom Ash and Fly Ash," Jayaranjan, Hullebusch, and Annachhatrewe, 01 April 2014, "Characterization of Coal Combustion Residues from Electric Utilities – Leaching and Characterization Data" EPA December 2009, "Chemical Constituents In Coal Combustion Product Leachate: Beryllium" EPRI November 2006, "Technical Memorandum, Technical Briefing Paper on Selenium" prepared by Exponent for TVA July 2010, and "Coal Ash: Characteristics, Management and Environmental Issues" EPRI September 2009. The highest concentration found in subbituminous coal ash for each of the concerned HAPs was used to calculate the HAPs emission from particulate matter. All individual HAPs were below the SMAL and de minimis level. Table 1 reflects the HAPs emissions assuming continuous operation (8760 hours per year).

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**Table 1: Emissions Summary (tons per year)**

<b>Pollutant</b>	<b>Regulatory <i>De Minimis</i> Levels</b>	<b>Existing Potential Emissions</b>	<b>Existing Actual Emissions (2014 EIQ)</b>	<b>Potential Emissions of Permit 092015-001</b>	<b>Potential Emissions of Permit 092015- 001A</b>	<b>Combined Emissions</b>
HAPs	25.0	Major	49.89	N/D	0.0032	0.0032

N/D = Not Determined

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

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

Sincerely,

AIR POLLUTION CONTROL PROGRAM



Kendall B. Hale  
Permits Section Chief

KBH:kkj

Enclosures

c: Northeast Regional Office  
PAMS File: 2015-12-024