

# PERMIT TO OPERATE INTERMEDIATE STATE

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.

**Intermediate Operating Permit Number:** OP2018-046  
**Expiration Date:** JUN 20 2023  
**Installation ID:** 047-2227  
**Project Number:** 2017-11-034

**Installation Name and Address**

KCMO Water Supply Treatment Plant  
1 NW Briarcliff Road  
Kansas City, MO 64116  
Clay County

**Parent Company's Name and Address**

City of Kansas City, MO Water Services  
Department  
1 NW Briarcliff Road  
Kansas City MO, 64116

**Installation Description:**

KCMO Water Supply Treatment Plant is located in Kansas City, MO. The activity at this facility is the treatment of water for the purpose of providing public drinking water. The plant gets its water from the Missouri River. The plant treats approximately one hundred eleven million gallons of water a day. The facility sells water to local communities. It is subject to 40 CFR Part 63, Subpart ZZZZ – *National Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines* and 40 CFR Part 63, Subpart CCCCCC – *National Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities*. The facility is a synthetic minor source of NO<sub>x</sub> and PM<sub>10</sub>.



Prepared by  
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Operating Permit Unit



Director of Designee  
Department of Natural Resources

JUN 20 2018

Effective Date

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## I. Installation Equipment Listing

### EMISSION UNITS WITH LIMITATIONS

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

<b>Emission Source</b>	<b>Description</b>
EP-1	Boiler #1, 200 hp (natural gas, fuel oil #2)
EP-2	Boiler #2, 200 hp (natural gas, fuel oil #2)
EP-3	Boiler #3, 100 hp (natural gas)
EP-4	Waukesha Engine, 1000 hp (natural gas)
EP-7	Lime Handling and Transfer, 25 tons/hr, controlled w/baghouse (CP-1)
EP-10	Electric Generator #1, 1500 kW (diesel)
	Electric Generator #2, 1500 kW (diesel)
-	Parts Washer
-	12,000 gallon underground unleaded gasoline storage tank

### EMISSION UNITS WITHOUT SPECIFIC LIMITATIONS

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

<b>Emission Source</b>	<b>Description</b>
-	20,000 gallon aboveground diesel storage tank (West)
-	20,000 gallon aboveground diesel storage tank (East)
-	12,000 gallon underground diesel storage tank
-	6,000 gallon aboveground diesel storage tank

## II. Plant Wide Emission Limitations

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

### **Recordkeeping:**

- 1) The permittee shall record all required record keeping in an appropriate format.
- 2) Records may be kept electronically using database or workbook systems, as long as all required information is readily available for compliance determinations.
- 3) The permittee shall keep a copy of this operating permit and review on site as well as copies of all issued construction permits and reviews on site.
- 4) All records must be kept for a minimum of 5 years and be made available to Department of Natural Resources' personnel upon request.

### **Reporting:**

- 1) The permittee shall report any exceedance of any of the terms imposed by this permit, or any malfunction which could cause an exceedance of any of the terms imposed by this permit, no later than ten (10) days after the exceedance or event causing the exceedance (unless otherwise specified in the specific condition).
- 2) The permittee shall report any deviations from the monitoring, recordkeeping, and reporting requirements of this permit condition in the annual compliance certification.
- 3) All reports and certifications shall be submitted to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or [AirComplianceReporting@dnr.mo.gov](mailto:AirComplianceReporting@dnr.mo.gov).

### 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.

<b>PERMIT CONDITION 001A</b>	
10 CSR 10-6.260, Restriction of Emission of Sulfur Compounds <sup>1</sup>	
Emission Source	Description
EP-10	Electric Generator #1, 1500 kW (diesel)
	Electric Generator #2, 1500 kW (diesel)

**Emission Limitation:**

- 1) The permittee shall not allow the emission in the atmosphere gases containing more than five hundred parts per million by volume (500 ppm<sub>v</sub>) of sulfur dioxide from the engine. [10 CSR 10-6.260(3)(A)2.]
- 2) Stack gases from the engine shall not contain more than thirty five milligrams per cubic meter (35 mg/m<sup>3</sup>) of sulfuric acid or sulfur trioxide or any combination of those gases averaged on any consecutive three (3)-hour time period. [10 CSR 10-6.260(3)(A)2.]

**Monitoring/Recordkeeping:**

Not required. See Statement of Basis.

<sup>1</sup> This regulation was rescinded from Missouri Code of State Regulations on November 30, 2015 but it still remains in the EPA-approved SIP and thus still remains an applicable regulation. Upon adoption of 10 CSR 10-6.261 into Missouri's SIP, 10 CSR 10-6.260 will be removed from the SIP and thus this rule will no longer be applicable to the installation. No action on the part of the permittee is needed to revise the operating permit. Upon removal of 10 CSR 10-6.260 from the SIP, Permit Condition 001A shall no longer be enforceable.

<b>PERMIT CONDITION 001B</b>	
10 CSR 10-6.260, Restriction of Emission of Sulfur Compounds <sup>1</sup>	
10 CSR 10-6.261, Control of Sulfur Dioxide Emissions <sup>2</sup>	
Emission Source <sup>3</sup>	Description
EP-1	Boiler #1, 200 hp (natural gas, fuel oil #2)
EP-2	Boiler #2, 200 hp (natural gas, fuel oil #2)

**Emission Limitation:**

The permittee shall not cause or permit emissions of sulfur dioxide containing in excess of eight (8) pounds per million Btu (MMBtu) of heat input averaged on any three (3)-hour period. [10 CSR 10-6.260(3)(B)2.A. & 10 CSR 10-6.261(3)(B)1.]

**Monitoring/Recordkeeping:**

Not required. See Statement of Basis.

<b>PERMIT CONDITION 002</b>	
10 CSR 10-6.220, Restriction of Emission of Visible Air Contaminants	
Emission Source <sup>4</sup>	Description
EP-1	Boiler #1, 200 hp (natural gas, fuel oil #2)
EP-2	Boiler #2, 200 hp (natural gas, fuel oil #2)
EP-7	Lime Handling and Transfer, 25 tons/hr, controlled w/baghouse (CP-1)

**Emission Limitation:**

- 1) The permittee shall not cause or permit to be discharged into the atmosphere from these emission sources any visible emissions with opacity greater than 20%. [10 CSR 10-6.220(3)(A)1.]
- 2) *Exception:* The permittee may discharge into the atmosphere from any source of emissions for a period aggregating not more than six minutes in any 60 minutes air contaminants with an opacity up to 60%. [10 CSR 10-6.220(3)(A)2.]

**Monitoring:**

- 1) The permittee shall conduct visible emission observations on each emission source using the procedures contained in USEPA Test Method 22. The permittee is only required to make observations when the emission unit is operating and when the weather conditions allow. If the permittee observes no visible using these procedures, then no further observations are required. If visible emissions are observed, the source representative would then conduct a Method 9 observation.

<sup>2</sup> This regulation has not yet been adopted into Missouri's SIP; therefore, this regulation is a state only requirement. Upon adoption into Missouri's SIP this regulation will be both a state and federal requirement. No action on the part of the permittee is needed to revise the operating permit.

<sup>3</sup> The limitation of this permit condition does not apply when only burning natural gas.

<sup>4</sup> The opacity limits do not apply to the boilers when they are burning exclusively natural gas. Natural gas-fueled units are exempt from the opacity limits per 10 CSR 10-6.220(1)(L). As a result, the permittee is not required to do monitoring/recordkeeping when burning natural gas. The opacity limits and monitoring/recordkeeping requirements do apply when burning fuel oil.

- 2) The permittee must maintain the following monitoring schedule. Reissuance of an operating permit does not reset this schedule:
  - a) The permittee shall conduct weekly observations for a minimum of eight (8) consecutive weeks after permit issuance.
  - b) Should the permittee observe no violations of this regulation during this period then-
    - i) The permittee may observe once every two (2) weeks for a period of eight (8) weeks.
    - ii) If a violation is noted, monitoring reverts to weekly.
    - iii) Should no violation of this regulation be observed during this period then-
      - (1) The permittee may observe once per month.
      - (2) 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.

**Recordkeeping:**

- 1) The permittee shall maintain records of all observation results using Attachments A1, A2 and B (or equivalents), 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;
  - c) Whether the visible emissions were normal for the process;
  - d) The permittee shall maintain records of any equipment malfunctions, which may contribute to visible emissions; and,
  - e) The permittee shall maintain records of all USEPA Method 9 opacity tests performed.

<b>PERMIT CONDITION 003</b>	
10 CSR 10-2.210, Control of Emissions from Solvent Metal Cleaners	
<b>Emission Source</b>	<b>Description</b>
-	Parts Washer

**Equipment Specifications:**

- 1) The permittee shall not operate a cold cleaner using a solvent with a vapor pressure greater than 1.0 mmHg at 20°C (68°F). [10 CSR 10-2.210(3)(A)1.A.]
  - a) *Exception:* The permittee may use an alternative method for reducing cold cleaning emissions if the level of emission control is equivalent to or greater than the requirements listed above. The Director must approve the alternative method. [10 CSR 10-2.210(3)(A)1.C.]
- 2) Each cold cleaner shall have a cover which shall prevent the escape of solvent vapors from the solvent bath while in the closed position, or an enclosed reservoir which limits the escape of solvent vapors from the solvent bath whenever parts are not being processed in the cleaner. [10 CSR 10-2.210(3)(A)1.D.]
- 3) When one or more of the following conditions exist, the design of the cover shall be such that is can be easily operated with one hand such that minimal disturbing of the solvent vapors in the tank occurs. (For covers larger than ten square feet, this shall be accomplished by either mechanical assistance such as a spring loading or counter weighing or by power systems): [10 CSR 10-2.210(3)(A)1.E.]
  - a) The solvent vapor pressure is greater than 0.3 psi measured at 37.8°C (100°F), such as in mineral spirits.
  - b) The solvent is agitated; or
  - c) The solvent is heated.

- 4) Each cold cleaner shall have an internal drainage facility so that parts are enclosed under the cover while draining. [10 CSR 10-2.210(3)(A)1.F.]
- 5) If an internal drainage facility cannot fit in the cleaning system and the solvent vapor pressure is less than 0.6 psi measured at 37.8°C (100°F), then the cold cleaner shall have an external drainage facility which provides for the solvent to drain back into the solvent bath. [10 CSR 10-2.210(3)(A)1.G.]
- 6) A permanent conspicuous label summarizing the operating procedures shall be affixed to the equipment or in a location readily visible during operation of the equipment. [10 CSR 10-2.210(3)(A)1.I.]
- 7) Any cold cleaner which uses a solvent that has a solvent vapor pressure greater than 0.6 psi measured at 37.8°C (100°F) or heated above 48.9°C (120°F) must use one of the following control devices: [10 CSR 10-2.210(3)(A)1.J.]
  - 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 demonstrating overall VOC emissions reduction efficiency greater than or equal to 65%. These control systems must receive approval from the Director prior to their use.

**Operational Limitations:**

- 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 except when performing maintenance or collection solvent samples. [10 CSR 10-2.210(3)(B)1.A.]
- 2) Cleaned parts shall be drained in the freeboard area for at least 15 seconds or until dripping ceases, whichever is longer. Parts having cavities or blind holes shall be tripped or rotated while the part is draining. During the draining, tripping, or rotating, the parts shall be positioned so that the solvent drains directly back into the cold cleaner. [10 CSR 10-2.210(3)(B)1.B.]
- 3) Whenever a cold cleaner fails to perform within its requirements stated in this permit condition, the unit shall be shut down immediately and shall remain shut down until operation is restored to meet the requirements of this permit condition. [10 CSR 10-2.210(3)(B)1.C.]
- 4) Solvent leaks shall be repaired immediately or the cold cleaner shall be shut down until the leaks are repaired. [10 CSR 10-2.210(3)(B)1.D.]
- 5) Any waste material removed from a cold cleaner shall be disposed of by one of the following methods or an equivalent method approved by the Director: [10 CSR 10-2.210(3)(B)1.E.]
  - a) Reduction of the waste material to less than 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 closed containers only. [10 CSR 10-2.210(3)(B)1.F.]
- 7) Only persons trained in at least the operational and equipment requirements specified in this permit condition for their particular solvent metal cleaning process shall be permitted to operate the equipment. [10 CSR 10-2.210(3)(C)1.]
- 8) The person who supervises any person who operates solvent cleaning equipment regulated by this permit condition shall receive equal or greater operational training than the operator. [10 CSR 10-2.210(3)(C)2.]
- 9) A procedural review shall be given to all solvent metal cleaning equipment operators at least one each twelve (12) months. [10 CSR 10-2.210(3)(C)3.]

**Monitoring/Recordkeeping:**

- 1) The permittee shall maintain all training records for solvent metal cleaning equipment operators using Attachment F or an equivalent. [10 CSR 10-2.210(3)(C)4.]
- 2) The permittee shall keep records of all types and amounts of solvent containing waste material from cleaning operations transferred to either a contract reclamation service or to a disposal facility and all amounts distilled on the premises using Attachments G or an equivalent. [10 CSR 10-2.210(4)(A)]
- 3) The permittee shall keep monthly inventory records of solvent types and amounts purchased and solvent consumption using Attachment D or an equivalent. [10 CSR 10-2.210(4)(B)]
- 4) The records shall also include maintenance and repair logs for both the parts washer and any associated control equipment using Attachment B or an equivalent.

<b>PERMIT CONDITION 004</b>	
10 CSR 10-6.075, Maximum Achievable Control Technology Regulations 40 CFR Part 63, Subpart ZZZZ – National Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines	
Emission Source	Description
EP-4	Waukesha Engine, 1000 hp (natural gas)
EP-10	Electric Generator #1, 1500 kW (diesel)
	Electric Generator #2, 1500 kW (diesel)

**Operational Limitation:**

- 1) The permittee must comply with the requirements in Table 2d of MACT ZZZZ.<sup>5</sup> [§63.6603(a) & Table 2d of MACT ZZZZ]
  - a) For EP-4:
    - i) Change oil and filter every 1,440 hours of operation, or annually, whichever comes first;<sup>6</sup>
    - ii) Inspect spark plugs every 1,440 hours of operation or annually, whichever comes first, and replace as necessary; and
    - iii) Inspect all hoses and belts every 1,440 hours of operation or annually, whichever come first, and replace as necessary.
  - b) For each engine under EP-10:
    - i) Change oil and filter every 1,000 hours of operation or annually, whichever comes first;<sup>6</sup>
    - ii) Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and
    - iii) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.
- 2) For EP-10, the permittee must use diesel fuel that meets the requirements in 40 CFR §80.510(b) for nonroad diesel fuel: [§63.6604(a)]
  - a) A maximum sulfur content of 15 ppm<sub>w</sub>; [§80.510(b)(1)(i)]
  - b) Cetane index or aromatic content, as follows: [§80.510(b)(2)]
    - i) A minimum cetane index of 40; or [§80.510(b)(2)(i)]

<sup>5</sup> The permittee does not need to meet the numerical CO emission limitations specified in Table 2d to MACT ZZZZ due to having a generating capacity of less than 12 MW. [§63.6603(b)(2)(iii)]

<sup>6</sup> The permittee has the option to utilize an oil analysis program as described in §63.6625(i) or (j) in order to extend the specified oil change requirement in Table 2d of MACT ZZZZ.

- ii) A maximum aromatic content of 35 volume percent. [§80.510(b)(2)(ii)]

**General Compliance Requirements:**

- 1) The permittee must be in compliance with the operational limitations and other requirements in this permit condition at all times. [§63.6605(a)]
- 2) The permittee must at all times operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require the permittee to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may 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)]
- 3) If the engines of EP-10 do not already have a closed crankcase ventilation system installed, the permittee must comply with the following: [§63.6625(g)]
  - a) The permittee shall install a closed crankcase ventilation system on EP-10 that prevents crankcase emissions from being emitted to the atmosphere, or [§63.6625(g)(1)]
  - b) Install an open crankcase filtration emission control system on EP-10 that reduces emissions from the crankcase by filtering the exhaust stream to remove oil mist, particulates, and metals. [§63.6625(g)(2)]
- 4) The permittee must follow the manufacturer's specified maintenance requirements for operating and maintaining the open or closed crankcase ventilation systems and replacing the crankcase filters, or can request the Administrator to approve different maintenance requirements that are as protective as manufacturer requirements. [§63.6625(g)]

**General Provisions:**

The permittee shall comply with the applicable General Provisions in §§63.1 through 63.15 as listed in Table 8 of MACT ZZZZ. [§63.6665]

**Continuous Compliance Requirements:**

- 1) The permittee shall demonstrate continuous compliance with each operating limitation and other requirements in this condition according to the methods specified below: [§63.6640(a) and Table 6 to MACT ZZZZ]
  - a) Operate and maintain the stationary RICE according to the manufacturer's emission-related operation and maintenance instructions; or
  - b) The permittee may develop and follow their 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.

**Recordkeeping:**

- 1) The permittee shall keep the following records: [§63.6655(a)]
  - a) A copy of each notification and report that they submitted to comply with MACT ZZZZ, including all documentation supporting any Initial Notification or Notification of Compliance Status submitted, according to the requirement in §63.10(b)(2)(xiv). [§63.6655(a)(1)]
  - b) Records of the occurrence and duration of each malfunction of operation (i.e. process equipment) or the air pollution control and monitoring equipment. [§63.6655(a)(2)]

- c) Records of performance tests and performance evaluations as required in §63.10(b)(2)(viii).  
[§63.6655(a)(3)]
- d) Records of all required maintenance performed on the air pollution control and monitoring equipment. [§63.6655(a)(4)]
- e) Records of actions taken during periods of malfunction to minimize emissions in accordance with §63.6605(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.  
[§63.6655(a)(5)]
- 2) The permittee must keep the records required in Table 6 of MACT ZZZZ to show continuous compliance with each operating limitation that applies. [§63.6655(d)]
- 3) The permittee must keep records of the maintenance conducted on the stationary RICE in order to demonstrate that they operated and maintained the stationary RICE according to their own maintenance plan. [§63.6655(e)]
- 4) The permittee shall keep all fuel records which indicate sulfur content, cetane index, and aromatic content of fuel used.
- 5) Records may be kept in either written or electronic form and maintained for at least five years.  
[§63.6660(c)]
- 6) These records shall be made available immediately for inspection to any Missouri Department of Natural Resources' personnel upon request. [§63.6660(a)]

**Reporting:**

- 1) The permittee shall report each instance in which they did not meet the requirements of this permit condition or Table 2d of MACT ZZZZ according to the requirements in §63.6650. [§63.6640(b)]
- 2) The permittee must also report each instance in which they did not meet the requirements in Table 8 of MACT ZZZZ that apply. [§63.6640(e)]
- 3) The permittee shall submit applicable reports as specified in §63.6650 to the Missouri Air Compliance Coordinator at EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219 and shall send copies to the Missouri Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102.

<b>PERMIT CONDITION 005</b>	
10 CSR 10-6.060 Construction Permits Required	
Kansas City Construction Permit 1280, issued September 16, 2009	
<b>Emission Source</b>	<b>Description</b>
EP-10	Electric Generator #1, 1500 kW (diesel)
	Electric Generator #2, 1500 kW (diesel)

**Operating Limitations:**

The permittee shall operate the generators of EP-10 less than 1050 hours per consecutive 12 months.  
[Special Condition 1]

**Monitoring/Recordkeeping:**

The permittee shall record the total hours of operation with Attachment E or an equivalent form.

<b>PERMIT CONDITION 006</b>	
10 CSR 10-6.065(5)(C)2. Voluntary Limitation(s)	
<b>Emission Source</b>	<b>Description</b>
EP-4	Waukesha Engine, 1000 hp (natural gas)

**Operational Limitation:**

The permittee shall not operate the engine more than 1900 hours per 12 consecutive months.

**Monitoring/Recordkeeping:**

The permittee shall record the total hours of operation with Attachment F or an equivalent form.

<b>PERMIT CONDITION 007</b>	
10 CSR 10-6.065(5)(C)2. Voluntary Limitation(s)	
<b>Emission Source</b>	<b>Description</b>
EP-7	Lime Handling and Transfer, 25 tons/hr, controlled w/baghouse (CP-1)

**Operational Limitation:**

- 1) The permittee shall control particulate matter emissions from the baghouse at all times EP-7 is in operation.
- 2) The baghouse shall be maintained in accordance with the manufacturer's specifications.
- 3) The baghouse shall be equipped with a gauge or meter, which indicates the pressure drop across the control device. This gauge or meter shall be located such that Missouri Department of Natural Resources' personnel may easily observe it.

**Monitoring/Recordkeeping:**

- 1) The permittee shall monitor and record the operating pressure drop across the baghouse at least once daily using Attachment C or an equivalent form.
- 2) The permittee shall maintain an operating and maintenance log (Attachment B or an equivalent) for the filters, which shall include the following:
  - a) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions;
  - b) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.; and

- c) A record of regular inspection schedule, the date and results of all inspections, including any actions or maintenance activities that result from the inspection.
- 3) The permittee shall maintain a copy of the manufacturer's specifications on-site.

<b>PERMIT CONDITION 008</b>	
10 CSR 10-6.075, Maximum Achievable Control Technology Regulations 40 CFR Part 63, Subpart CCCCCC – National Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities	
Emission Source	Description
-	12,000 gallon underground unleaded gasoline storage tank

**Applicability:**

- 1) The permittee with a GDF with a monthly throughput of less than 10,000 gallons of gasoline must comply with the requirements in §63.11116. [§63.11111(b)]
- 2) The permittee shall, upon request by the Administrator, demonstrate the monthly throughput is less than 10,000 gallons. Recordkeeping to document monthly throughput must begin in January 10, 2008. [§63.11111(e)]
- 3) If the throughput of the GDF ever exceeds an applicable throughput threshold, the permittee shall remain subject to the requirements for sources above the threshold, even if the throughput later falls below the applicable throughput threshold. [§3.11111(i)]

**Management Practices:**

- 1) The permittee must, at all times, operate and maintain the affected source in a manner consistent with safety and good air pollution control practices for minimizing emissions. [§63.11115(a)]
- 2) The permittee shall not allow gasoline to be handled in a manner that would result in vapor releases to the atmosphere for extended periods of time. Measures to be taken include, but are not limited to, the following: [§63.11116(a)]
  - a) Minimize gasoline spills; [§63.11116(a)(1)]
  - b) Clean up spills as expeditiously as practicable; [§63.11116(a)(2)]
  - c) Cover all open gasoline containers and all gasoline storage tank fill-pipes with a gasketed seal when not in use; [§63.11116(a)(3)]
  - d) Minimize gasoline sent to open waste collection systems that collect and transport gasoline to reclamation and recycling devices, such as oil/water separators. [§63.11116(a)(4)]
- 3) The permittee is not required to submit notifications or reports, but the permittee shall have records available within 24 hours of a request by the Administrator to document the installation's gasoline throughput. [§63.11116(b)]

**General Provisions:**

The permittee shall comply with the applicable General Provisions in Table 3 to MACT CCCCCC. [§63.11130]

**Recordkeeping:**

- 1) The permittee shall keep records as specified in §63.11125(d)(1) and (2). [§63.11125(d)]
- 2) Records of the occurrence and duration of each malfunction of operation (*i.e.*, process equipment) or the air pollution control and monitoring equipment. [§63.11125(d)(1)]

- 3) Records of actions taken during periods of malfunction to minimize emissions in accordance with §63.11115(a), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. [§63.11125(d)(2)]

## IV. Core Permit Requirements

The installation shall comply with each of the following requirements: Consult the appropriate sections in the Code of Federal Regulations (CFR), the Code of State Regulations (CSR), and local ordinances for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued. The following are only excerpts from the regulation or code, and are provided for summary purposes only.

### **10 CSR 10-6.045 Open Burning Requirements**

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

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

- 1) In the event of a malfunction, which results in excess emissions that exceed one hour, the permittee shall submit to the director within two business days, in writing, the following information:
  - a) Name and location of installation;
  - b) Name and telephone number of person responsible for the installation;
  - c) Name of the person who first discovered the malfunction and precise time and date that the malfunction was discovered.
  - d) Identity of the equipment causing the excess emissions;
  - e) Time and duration of the period of excess emissions;
  - f) Cause of the excess emissions;
  - g) Air pollutants involved;
  - h) Estimate of the magnitude of the excess emissions expressed in the units of the applicable requirement and the operating data and calculations used in estimating the magnitude;
  - i) Measures taken to mitigate the extent and duration of the excess emissions; and
  - j) Measures taken to remedy the situation that caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations.
- 2) The permittee shall submit the paragraph 1 information to the director in writing at least ten days prior to any maintenance, start-up or shutdown activity which is expected to cause an excessive release of emissions that exceed one hour. If notice of the event cannot be given ten days prior to the planned occurrence, notice shall be given as soon as practicable prior to the activity.
- 3) Upon receipt of a notice of excess emissions issued by an agency holding a certificate of authority under section 643.140, RSMo, the permittee may provide information showing that the excess emissions were the consequence of a malfunction, start-up or shutdown. The information, at a minimum, should be the paragraph 1 list and shall be submitted not later than 15 days after receipt of the notice of excess emissions. Based upon information submitted by the permittee or any other pertinent information available, the director or the commission shall make a determination whether the excess emissions constitute a malfunction, start-up or shutdown and whether the nature, extent and duration of the excess emissions warrant enforcement action under section 643.080 or 643.151, RSMo.

- 4) Nothing in this rule shall be construed to limit the authority of the director or commission to take appropriate action, under sections 643.080, 643.090 and 643.151, RSMo to enforce the provisions of the Air Conservation Law and the corresponding rule.
- 5) Compliance with this rule does not automatically absolve the permittee of liability for the excess emissions reported.

#### **10 CSR 10-6.060 Construction Permits Required**

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

#### **10 CSR 10-6.065 Operating Permits**

The permittee shall file a complete application for renewal of this operating permit at least six months before the date of permit expiration. In no event shall this time be greater than eighteen months. The permittee shall retain the most current operating permit issued to this installation on-site. The permittee shall immediately make such permit available to any Missouri Department of Natural Resources personnel upon request.

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

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

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

- 1) The permittee shall submit a Full Emissions Report either electronically via MoEIS, which requires Form 1.0 signed by an authorized company representative, or on Emission Inventory Questionnaire (EIQ) paper forms on the frequency specified in this rule and in accordance with the requirements outlined in this rule. Alternate methods of reporting the emissions, such as spreadsheet file, can be submitted for approval by the director.
- 2) Public Availability of Emission Data and Process Information. Any information obtained pursuant to the rule(s) of the Missouri Air Conservation Commission that would not be entitled to confidential treatment under 10 CSR 10-6.210 shall be made available to any member of the public upon request.
- 3) The permittee shall submit a full EIQ for the 2017 and 2020 reporting years. In the interim years the installation may submit a Reduced Reporting Form; however, if the installation's emissions increase or decrease by more than five tons when compared to their last submitted full EIQ, the installation shall submit a full EIQ rather than a Reduced Reporting Form.
- 4) In addition to the EIQ submittal schedule outlined above, any permit issued under 10 CSR 10-6.060 section (5) or (6) triggers a requirement that a full EIQ be submitted in the first full calendar year after the permitted equipment initially operates.

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

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

**10 CSR 10-6.150 Circumvention**

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

**10 CSR 10-6.165 Restriction of Emission of Odors**

**This requirement is a State Only permit requirement.**

No person may cause, permit or allow the emission of odorous matter in concentrations and frequencies or for durations that odor can be perceived when one volume of odorous air is diluted with seven volumes of odor-free air for two separate trials not less than 15 minutes apart within the period of one hour.

**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.

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

**This is a State Only permit requirement.**

The permittee shall conduct all asbestos abatement projects within the procedures established for certification and accreditation by 10 CSR 10-6.250. This rule requires individuals who work in asbestos abatement projects to be certified by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires training providers who offer training for asbestos abatement occupations to be accredited by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires persons who hold exemption status from certain requirements of this rule to allow the department to monitor training provided to employees.

**10 CSR 10-6.280 Compliance Monitoring Usage**

- 1) The permittee is not prohibited from using the following in addition to any specified compliance methods for the purpose of submission of compliance certificates:
  - a) Monitoring methods outlined in 40 CFR Part 64;
  - b) Monitoring method(s) approved for the permittee pursuant to 10 CSR 10-6.065, “Operating Permits”, and incorporated into an operating permit; and
  - c) Any other monitoring methods approved by the director.
- 2) Any credible evidence may be used for the purpose of establishing whether a permittee has violated or is in violation of any such plan or other applicable requirement. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred at an installation:
  - a) Monitoring methods outlined in 40 CFR Part 64;
  - b) A monitoring method approved for the permittee pursuant to 10 CSR 10-6.065, “Operating Permits”, and incorporated into an operating permit; and
  - c) Compliance test methods specified in the rule cited as the authority for the emission limitations.
- 3) The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
  - a) Applicable monitoring or testing methods, cited in:
    - i) 10 CSR 10-6.030, “Sampling Methods for Air Pollution Sources”;
    - ii) 10 CSR 10-6.040, “Reference Methods”;
    - iii) 10 CSR 10-6.070, “New Source Performance Standards”;
    - iv) 10 CSR 10-6.080, “Emission Standards for Hazardous Air Pollutants”;
  - b) Other testing, monitoring, or information gathering methods, if approved by the director, that produce information comparable to that produced by any method listed above.

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

- 1) The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
  - a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to 40 CFR §82.106.
  - b) The placement of the required warning statement must comply with the requirements of 40 CFR §82.108.

- c) The form of the label bearing the required warning statement must comply with the requirements of 40 CFR §82.110.
- d) No person may modify, remove, or interfere with the required warning statement except as described in 40 CFR §82.112.
- 2) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B of 40 CFR Part 82:
  - a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices described in 40 CFR §82.156.
  - b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment described in 40 CFR §82.158.
  - c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR §82.161.
  - d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with the record keeping requirements of 40 CFR §82.166. ("MVAC-like" appliance as defined at 40 CFR §82.152).
  - e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to 40 CFR §82.156.
  - f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR §82.166.
- 3) If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.
- 4) If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements contained in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.
- 5) The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program. *Federal Only - 40 CFR Part 82.*

## VI. 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, §(5)(C)1, §(6)(C)1.B, §(5)(E)2.C 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. If a timely and complete application for a permit renewal is submitted, but the Air Pollution Control Program fails to take final action to issue or deny the renewal permit before the end of the term of this permit, this permit shall not expire until the renewal permit is issued or denied.

### **10 CSR 10-6.065, §(5)(C)1 and §(6)(C)1.C General Record Keeping and Reporting Requirements**

- 1) Record Keeping
  - a) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
  - b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any Missouri Department of Natural Resources' personnel upon request.
- 2) Reporting
  - a) All reports shall be submitted to the Air Pollution Control Program, Compliance and Enforcement Section, P. O. Box 176, Jefferson City, MO 65102.
  - b) The permittee shall submit a report of all required monitoring by:
    - i) April 1st for monitoring which covers the January through December time period.
    - ii) Exception. Monitoring requirements which require reporting more frequently than annually shall report no later than 30 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.
  - d) Submit supplemental reports as required or as needed. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
    - i) Notice of any deviation resulting from an emergency (or upset) condition as defined in paragraph (6)(C)7.A of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two working days after the date on which the emission limitation is exceeded due to the emergency, if the permittee wishes to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and the permittee can identify the cause(s) of the emergency. The permitted installation must show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or requirements in the permit. The notice must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.

- ii) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.
- iii) Any other deviations identified in the permit as requiring more frequent reporting than the permittee's semiannual report shall be reported on the schedule specified in this permit.
- e) Every report submitted shall be certified by the responsible official, except that, if a report of a deviation must be submitted within ten days after the deviation, the report may be submitted without a certification if the report is resubmitted with an appropriate certification within ten days after that, together with any corrected or supplemental information required concerning the deviation.
- f) The permittee may request confidential treatment of information submitted in any report of deviation.

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

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

**10 CSR 10-6.065(6)(C)1.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 under this rule.
- 6) Failure to comply with the limitations and conditions that qualify the installation for an Intermediate permit make the installation subject to the provisions of 10 CSR 10-6.065(6) and enforcement action for operating without a valid part 70 operating permit.

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

None.

**10 CSR 10-6.065, §(5)(B)4; §(5)(C)1, §(6)(C)3.B; and §(6)(C)3.D; and §(5)(C)3 and §(6)(C)3.E.(I) – (III) and (V) – (VI) Compliance Requirements**

- 1) Any document (including reports) required to be submitted under this permit shall contain a certification signed by the responsible official.

- 2) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized officials of the Missouri Department of Natural Resources, or their authorized agents, to perform the following (subject to the installation's right to seek confidential treatment of information submitted to, or obtained by, the Air Pollution Control Program):
  - a) Enter upon the premises where a permitted installation is located or an emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
  - b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
  - c) Inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
  - d) As authorized by the Missouri Air Conservation Law, Chapter 643, RSMo or the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the terms of this permit, and all applicable requirements as outlined in this permit.
- 3) All progress reports required under an applicable schedule of compliance shall be submitted semiannually (or more frequently if specified in the applicable requirement). These progress reports shall contain the following:
  - a) Dates for achieving the activities, milestones or compliance required in the schedule of compliance, and dates when these activities, milestones or compliance were achieved, and
  - b) An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measures adopted.
- 4) The permittee shall submit an annual certification that it is in compliance with all of the federally enforceable terms and conditions contained in this permit, including emissions limitations, standards, or work practices. These certifications shall be submitted annually by April 1st, unless the applicable requirement specifies more frequent submission. These certifications shall be submitted to EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, as well as the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. 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)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(5)(C)5 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. 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 a Title I modification; Please Note: Changes at the installation which affect the emission limitation(s) classifying the installation as an intermediate source (add additional equipment to the record keeping requirements, increase the emissions above major source level) do not qualify for off-permit changes.
  - b) The permittee must provide contemporaneous written notice of the change to the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219. 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; and
  - 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.

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

The application utilized in the preparation of this permit was signed by Michael Klender, 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 30 days of the change. The notification shall include the name and title of the new person assigned by the source owner or operator to represent and bind the installation in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible person that were used in the establishment of limiting permit conditions on this permit will continue to be binding on the installation until such time that a revision to this permit is obtained that would change said representations, agreements and covenants.

**10 CSR 10-6.065, §(5)(E)4 and §(6)(E)6.A(III)(a)-(c) Reopening-Permit for Cause**

This permit shall be reopened for cause if:

- 1) The Missouri Department of Natural Resources (MoDNR) or the Environmental Protection Agency (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,
- 2) 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,
- 3) MoDNR or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

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

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

## VII. Attachments

Attachments follow.

















## STATEMENT OF BASIS

### Voluntary Limitations

In order to qualify for this Intermediate State Operating Permit, the permittee has accepted voluntary, federally enforceable emission limitations. Per 10 CSR 10-6.065(5)(C)1.A.(VI), if these limitations are exceeded, the installation immediately becomes subject to 10 CSR 10-6.065(6) and enforcement action for operating without a valid part 70 operating permit. It is the permittee's responsibility to monitor emission levels and apply for a part 70 operating permit far enough in advance to avoid this situation. This may mean applying more than eighteen months in advance of the exceedance, since it can take that long or longer to obtain a part 70 operating permit.

### INSTALLATION DESCRIPTION

KCMO Water Supply Treatment Plant is located in Kansas City, MO. The activity at this facility is the treatment of water for the purpose of providing public drinking water. The plant gets its water from the Missouri River. The plant treats approximately one hundred eleven million gallons of water a day. The facility sells water to local communities. It is subject to 40 CFR Part 63, Subpart ZZZZ – *National Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines* and 40 CFR Part 63, Subpart CCCCCC – *National Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities*. The facility is a synthetic minor source of NO<sub>x</sub> and PM<sub>10</sub>. It is not on the List of Named Installations in 10 CSR 10-6.020.

### Updated Potential to Emit for the Installation

Pollutant	Potential to Emit (tons/yr) <sup>8</sup>
PM <sub>10</sub>	5.26
PM <sub>2.5</sub>	5.26
Sulfur Oxides (SO <sub>x</sub> )	1.58
Nitrogen Oxides (NO <sub>x</sub> )	63.06
Volatile Organic Compounds (VOCs)	1.95
Carbon Monoxide (CO)	17.84
Hazardous Air Pollutants (HAPs)	0.16

<sup>8</sup> Each emission unit was evaluated at 8,760 hours of uncontrolled annual operation unless otherwise noted. The PTE is under major levels due to limitations on engine hours and the use of a baghouse on EP-7.

- EP-4 was calculated at 1900 hours of operation and EP-10 was calculated at 1050 hours of operation due to federally enforceable limits in the operating permit.
- EP-7 was calculated with the use of its baghouse at 99% control efficiency.
- Emissions from the parts washer were not included in the PTE.

**Reported Air Pollutant Emissions, tons per year**

<b>Pollutants</b>	<b>2016</b>	<b>2015</b>	<b>2014</b>	<b>2013</b>	<b>2012</b>
Particulate Matter ≤ Ten Microns (PM <sub>10</sub> )	0.84	0.81	0.70	0.98	8.13
Particulate Matter ≤ 2.5 Microns (PM <sub>2.5</sub> )	0.62	0.61	0.49	0.77	3.48
Sulfur Oxides (SO <sub>x</sub> )	0.11	0.07	0.06	0.30	0.17
Nitrogen Oxides (NO <sub>x</sub> )	11.36	6.88	5.97	12.63	10.34
Volatile Organic Compounds (VOC)	0.52	0.38	0.31	0.69	0.56
Carbon Monoxide (CO)	5.03	5.04	3.65	6.38	5.53
Hazardous Air Pollutants <sup>9</sup> (HAPs)	--	--	--	--	--

**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) Intermediate Operating Permit Application, received November 27, 2017;
- 2) 2016 Emissions Inventory Questionnaire, received January 24, 2017;
- 3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition;
- 4) WebFIRE;
- 5) Kansas City Construction Permit 904, issued January 1, 2000;
- 6) Kansas City Construction Permit 1280, issued September 6, 2009

**Construction Permit History**

Kansas City Construction Permit 904, issued January 1, 2000

This construction permit was issued for the addition of two boilers. It contains no special conditions.

Kansas City Construction Permit 1280, issued September 6, 2009

This construction permit was issued for the addition of two generators. It contains 7 special conditions.

- Special Condition 1 limits the annual hours of operation for the generators. The ‘annual’ limit has been reworded to ‘per consecutive 12 months’ in this operating permit.
- Special Condition 2 requires the generators to be equipped with a non-resettable hour meter. This condition is already required by MACT ZZZZ. In order to streamline this operating permit, this condition has not been incorporated into the operating permit.

<sup>9</sup> HAPs are below the reporting threshold for the EIQ.

- Special Condition 3 requires monthly fuel records be kept. While this condition requires recordkeeping for at least 3 years, this operating permit requires recordkeeping for at least 5 years. This special condition has been added to the operating permit.
- Special Condition 4 requires notification of any exceedance in five (5) business days. This condition was not incorporated into the operating permit; this operating permit instead requires notification of any exceedances within ten (10) days.
- Special Condition 5 requires reporting for the generators. In order to streamline this operating permit, this condition was not incorporated. Refer to Section V. General Permit Requirements for reporting requirements.
- Special Condition 6 limits the sulfur fuel content to 0.5 weight%. However, a more stringent, applicable sulfur limit exists in MACT ZZZZ. As a result, this permit condition was not added to the operating permit in order to streamline it.
- Special Condition 7 requires the permittee to receive a permit prior to replacing or adding more generators. This condition has not been incorporated into the operating permit. The permittee should only receive a new construction permit from the Air Pollution Control Program if required by 10 CSR 10-6.060 Construction Permits Required.

#### **New Source Performance Standards (NSPS) Applicability**

40 CFR Part 60, Subpart IIII – *Standards of Performance for Stationary Compression Ignition Internal Combustion Engines*

This subpart does not apply. All compression engines were manufactured before the applicability date.

40 CFR Part 60, Subpart JJJJ – *Standards of Performance for Stationary Spark Ignition Internal Combustion Engines*

This subpart does not apply. All spark ignitions were manufactured before the applicability date.

#### **Maximum Achievable Control Technology (MACT) Applicability**

40 CFR Part 63, Subpart ZZZZ – *National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*

This subpart applies to the installation and has been incorporated into the operating permit. The engines are used for voluntary load reduction to help prevent potential power issues in the grid. Because they are used for this activity, they do not meet the definition of an emergency generator in the subpart.

#### **National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability**

None.

#### **Missouri Code of State Regulations (CSR) Applicability**

10 CSR 10-2.210, *Control of Emissions From Solvent Metal Cleaning*

This rule applies to the installation. The installation uses cold cleaners.

10 CSR 10-6.100, *Alternate Emission Limits*

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

10 CSR 10-6.170, *Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin*

While this rule applies, it is unlikely that particulate matter will emit beyond the installation's property line in any significant quantities due to the nature of its emission points. As a result, the monitoring and recordkeeping requirements of this condition have been removed from the Core Permit Requirements.

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

This rule applies to the installation. The opacity limitations do not apply to the boilers EP-1 and EP-2 when they are burning exclusively natural gas. Engines are exempt per 10 CSR 10-6.220(1)(A). The boilers are subject to the rule when burning fuel other than natural gas. Lime Handling and Transfer is subject due to emitting PM.

10 CSR 10-6.260, *Restriction of Emission of Sulfur Compounds*

This regulation was rescinded from the code of state regulations (CSR). However, this regulation is still contained in Missouri's State Implementation Plan (SIP). This regulation is a federally enforceable requirement until it is removed from the SIP, therefore it must appear in this operating permit.

The EP-10 generators are subject to this regulation. The following calculations demonstrate that when fuel with a sulfur content less than 0.0015 weight% is used, the engines will be in compliance with 10 CSR 10-6.260.

**SO<sub>2</sub>:**

$$\text{Distillate Oil SO}_2 \text{ Emission Factor (lbs/MMBtu)} = \frac{142(0.0015)\text{lb}/10^3\text{gal}}{140\text{ MMBtu}/10^3\text{gal}} = 0.0015\text{ lb/MMBtu}$$

(AP-42 Table 1.3-1(9/98))

$$\text{ppmv SO}_2 = \left(\frac{0.0015\text{lb}}{\text{MMBtu}}\right) \times \left(\frac{\text{MMBtu}}{10,320\text{ wscf}}\right) \times \left(\frac{\text{ppmw}}{1.660E^{-7}\text{lb/scf}}\right) \times \left(\frac{0.45\text{ppmv}}{\text{ppmw}}\right) = 0.395\text{ ppmv}$$

(Appendix A-7 to Part 60)

**SO<sub>3</sub>**

$$\text{Distillate Oil SO}_3 \text{ emission factor (lb/MMBtu)} = \frac{2(0.0015)\text{ lb}/10^3\text{gal}}{140\text{ MMBtu}/10^3\text{gal}} = 2.14E^{-5}\text{ lb/MMBtu}$$

(AP-42 Table 1.3-1(9/98))

$$\text{ppmv SO}_3 = \left(\frac{2.14E^{-5}\text{ lb}}{\text{MMBtu}}\right) \times \left(\frac{\text{MMBtu}}{10,320\text{ wscf}}\right) \times \left(\frac{1.602E^7\text{ mg ft}^3}{\text{lb m}^3}\right) = 0.033\text{ mg/m}^3$$

(Appendix A-7 to Part 60)

10 CSR 10-6.261, *Control of Sulfur Dioxide Emissions*

These rules apply to the installation. This rule does not apply to EP-1 and EP-2 when burning natural gas. Generators EP-10 are exempt from this regulation per 10 CSR 10-6.261(1)(C)2 for having a more restrictive sulfur limitation in Kansas City Construction Permit 1280.

Monitoring/recordkeeping is not required for boilers EP-1 and EP-2 when burning fuel oil #2. Their emission factor when burning fuel oil #2 is 0.6 lb/10<sup>3</sup> gal (SCC 10200503). According to AP-42, Chapter 1.3, fuel oil #2 as a heat content of 140 MMBtu/10<sup>3</sup> gal. When converted, the emission factor is ~0.004 lb/MMBtu. This is considerably lower than the limit in Permit Condition 001B. As a result, it is unlikely that the installation will surpass this limit.

10 CSR 10-6.400, *Control of Emission of Particulate Matter From Industrial Processes*

This rule does not apply. The engines do not meet the definition of process weight in 10 CSR 10-6.020 and thus 10 CSR 10-6.400 is not applicable to them. The boilers are exempt per 10 CSR 10-6.400(1)(B)6 due to being indirect heating sources. EP-7 Lime Handling and Transfer is exempt per 10 CSR 10-6.400(1)(B)15 for having a control device efficiency over 90%.

**Greenhouse Gas Emissions**

The installation is a minor source of GHGs. There are no currently issued GHG regulations applicable to this installation. Missouri regulations do not require the installation to report CO<sub>2</sub>e emissions in their Missouri Emissions Inventory Questionnaire; therefore, the installation's CO<sub>2</sub>e emissions were not included within this permit.

**Other Regulatory Determinations**

None.

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

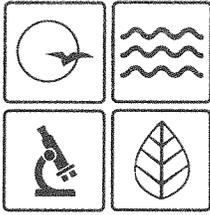
Any regulation which is not specifically listed in either the Operating Permit or in the above Statement of Basis does not appear, based on this review, to be an applicable requirement for this installation for one or more of the following reasons:

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 ACP'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 ACP a schedule for achieving compliance for that regulation(s).

## **Response to Public Comments**

The operating permit draft was put up on public notice on April 20, 2018 for a period of 30 days. During this period no comments were received.



Missouri Department of dnr.mo.gov

# NATURAL RESOURCES

Eric R. Greitens, Governor

Carol S. Comer, Director

JUN 20 2018

Mr. Michael Klender  
KCMO Water Supply Treatment Plant  
1 NW Briarcliff Road  
Kansas City, MO 64116

Re: KCMO Water Supply Treatment Plant, 047-2227  
Permit Number: OP2018-046

Dear Mr. Klender:

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

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

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

If you have any questions or need additional information regarding this permit, please contact the Air Pollution Control Program (APCP) at (573) 751-4817, or you may write to the Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

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

MJS:kwj

Enclosures

c: PAMS File: 2017-11-034



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