### RECEIVED



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AND GLEWHON CONTROL PGM

Chris

Jeff Creason Environmental Services P.O. Box 11739 10700 East 350 Highway Kansas City, MO 64138 phone (816) 737-7527 fax (816) 743-2931 jeff.creason@aquila.com

January 27, 2006

Enforcement Unit Missouri Department of Natural Resources Air Pollution Control Program PO Box 176

Jefferson City, MO 65102-0176 RE: Aguila - South Harper Peaking Facility, 037-0063 4th Ouarter Excess Emissions Report

#### Dear Enforcement Unit:

Pursuant to 40 CFR Part 60.7(d), and Condition 6.E.1 of Construction Permit 122004-017, Aquila submits the attached Excess Emissions Report for the above referenced facility. Please note that on December 6, 2005, Unit 3 recorded two excursions above 15 ppm NOx. The two values recorded were 15.5 and 15.1.

#### EVENT EXPLANATION and CORRECTIVE ACTION

The South Harper units, commissioned in August 2005, have had no cold weather operational experience before this season. On December 6, Unit 3 was operating during 16 degree ambient temperatures. Low frequency combustor dynamics and other cold-weather related issues contributed to elevated NOx emissions. Operators made adjustments necessary to lower NOx emissions. Aquila does not anticipate similar future events.

If you have any questions regarding this report, please contact me at 816.737.7527.

Sincerely,

Jeff Creason

Environmental Engineer

Enclosure

cc:

Tom Miller Debbie Nielsen Block Andrews Steve Brooks Corporate File

Case No(s).

## **Continuous Emissions Monitoring Quarterly Report**

		Date:	January 26, 2006
Installation Name: Aquila - South Har	per Peaking Facility		<del></del>
Installation Address: 24400 South Ha	rper Road, Peculiar, MO 64078		
County Plant Number: 037-0063			
Reporting Period: October 1, 2005 to			
Reporting Under: 40 CFR Part 60.7(d)	, Construction Permit 122004-0	17	
Emission Point: UNIT 1		·	
CEMS: Teledyne - API Model 200EM I			
Pollutant Monitored (limit): 15 ppmvd	of NOx @ 15% $O_2$ , 3-hr average	je	
Date of Last Audit: 8/10/2005 RATA	<del></del>	<del></del>	
Total Source Operation Per Emission	Point (hours): 9.87	<del></del>	
Reasons for Excess Emissions	Eccode 12 4 Miles	Duration (h	ours):">% >% > 0
Startup/Shutdown		0	
Control Equipment Problems		0	
Process Problems		0	
Other Known Excess Emissions		0	
Unknown Excess Emissions		0	
Fuel Problems		0	
Cleaning; Soot-Blowing		0	
Percent Operating Time Above Stand	ard	0.0%	
<1%			
Code Comments		aren Direces e de la cerc	
The contract of the second of the contract of		The state of the s	ATTORNEY STATE OF THE PROPERTY
		<del></del>	
Reason for Monitor Downtimes		Division /h	ours) 14 14 14 15 16
CEM Equipment Malfunction	and the court of	*Datation*(i)	OUIS/ERRORS SEEDING
Non-CEM Equipment Malfunction		<del></del>	
Calibration	<del> </del>	0	<del></del>
Other Known CEM Downtime *	13	3.88	
Unknown CEM Downtime	<u> </u>	0	
Percent Operating Downtime	<del></del>	39.3%	
<5%			······································
Code Comments			Company Logic 2045
13 * Monitor out-of-control period	A disconnected calibration line	reculted in a	
	t-of-control period. The out-of-co		
low operating hours, resulted		introl period,	ogether with very
low operating notice, resulted	in relatively high downthic.		<del></del>
<del></del>	<del></del>	<del></del>	
Submitted by: Block Andrews, Directo	r of Environmental Services		
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Signature: Block Under	eus Da	te:	/30/06

# Continuous Emissions Monitoring Quarterly Report Monitor Downtime Form

	Date:	January 26, 2006
Source Name: Aquila - South Harper Peaking Facility		
Reporting Quarter: Forth, 2005		
Emission Point: South Harper Unit 1		
Pollutant Monitored (limit): 15 ppm of NOx		

Downtii	ne Start	Total	Downti	me End	Reason Gode
Date //	Time	233	10/3/2005	1600	13 - out of control
10/3/2005	1200		10/3/2003	1000	10 - 04( 01 00/14/0)
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Sum De	nwatime	233			

Sun	n Downtime				
Submitted by	: Block Andr	rews, Director of Environme	ntal Services		
Signature:	Block	andreus	Date:	1/30/06	

## Continuous Emissions Monitoring Quarterly Report Excess Emissions Form

				Date:	January 26, 2006
Source Name: A	Aquila - South Har	per Peaking Facil	lity		
Reporting Quart	South Harper Un				
Pollutant Monito	red (limit): 15 pp	m of NOx		<del></del>	
Date 🕼	Time Start	Time End	Minutes 13.	Magnitude	Reason Code
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	Emissions Startu		0		
	lock Andrews, Dir		nental Services		
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Signature: D	lock and	rews		Date:	30/06

## **Continuous Emissions Monitoring Quarterly Report**

		Date:	January 26, 2006
Installation Name: Aquila - South H			
Installation Address: 24400 South F	larper Road, Pecul	ar, MO 64078	
County Plant Number: 037-0063			
Reporting Period: October 1, 2005 t			
Reporting Under: 40 CFR Part 60.7(	d), Construction Pe	ermit 122004-017	
Emission Point: UNIT 2			
CEMS: Teledyne - API Model 200EN			
Pollutant Monitored (limit): 15 ppm	/d of NOx @ 15% O	<sub>2</sub> , 3-hr average	
Date of Last Audit: 8/9/2005 RATA			
Total Source Operation Per Emissio	n Point (hours):	11.02	
Reasons for Excess Emissions	Code # ***	Duration (h	iours) x e a l'estate
Startup/Shutdown		0	
Control Equipment Problems		0	
Process Problems		0	
Other Known Excess Emissions		0	
Unknown Excess Emissions		0	
Fuel Problems		0	
Cleaning; Soot-Blowing		0	
Percent Operating Time Above Star	ndard	0.0%	
<1%			
Code : Comments :			
Code :: Comments: :: A - Comments			
<u> </u>		<del></del>	
		<del></del>	
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	<del></del>	<del></del>	
Reason for Monitor Downtime	Code 44	Duration (h	ours) 👢 🖟 🗱
CEM Equipment Malfunction		0	
Non-CEM Equipment Malfunction		0	
Calibration	12	0.87	
Other Known CEM Downtime *	13	3.28	
Unknown CEM Downtime	<del>- </del>	0 27.70/	
Percent Operating Downtime <5%	-J	37.7%	
<b>5</b> 76			
Code : Comments : Comments	Control of the Control		
13 * Monitor out-of-control perio	od. A disconnected of	alibration line resulted in a	"failed"
calibration and subsequent			
low operating hours, resulted	d in relatively high do	owntime.	
Submitted by: Block Andrews, Direct	tor of Environment	al Services	
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Signature: Block Cinhe		Pag. 1	1/30/06
Signature: Plack Until	wa	Date:	4 246

## Continuous Emissions Monitoring Quarterly Report Monitor Downtime Form

		Monitor De	owntime Form		
				Date:	January 26, 2006
Source Name: A	quila - South Har	per Peaking Faci	lity	·	
Reporting Quarte	er: Forth, 2005				
<b>Emission Point:</b>	South Harper Un	it 2			•
<b>Pollutant Monito</b>	red (limit): 15 pp	m of NOx			
					· · · · · · · · · · · · · · · · · · ·
Downtii	me Start	Total, 1	Downti	me End	and the second second second
Date:	Time L	Minutes	Date /	Time	Reason Code
10/3/2005	1300	197	10/3/2005	1600	13 - out of control
10/7/2005	0800	52	10/7/2005	0800	12 - calibration
			T		

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10/3/2005	1300	197	10/3/2005	1600	13 - out of control
10/7/2005	0800	52	10/7/2005	0800	12 - calibration
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Sum Do	wntime	249			

Submitted by	y: Block Andr	ews, Director of Env	vironmental Services			
Signature:	Block	anlieus		Date:	1/30/06	

#### Continuous Emissions Monitoring Quarterly Report **Excess Emissions Form**

		EVCE22 FIL	113310113 I OIIII		_
O-1 No	: January 26, 2006				
Reporting Quart	Aquila - South Har	per Peaking Faci	inty		-
Emission Point:	South Harper Ur	nit 2			~
Pollutant Monito	red (limit): 15 pp	m of NOx	<del></del>	<del></del>	-
Date	Time Start	Time End	Minutes	Magnitude	Reason Code
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	n Excess Emissio		0		
Sum Excess	<b>Emissions Startu</b>	p/Shutdown	00		
Submitted by: B	lock Androwe Dir	ector of Environ	nental Services		
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Signature:	lock and	reus		Date: 1/50	0/06

Signature:

## **Continuous Emissions Monitoring Quarterly Report**

		Date:	January 26, 2006
Installation Name: Aquila - South Harp	er Peaking Faci	lity	
Installation Address: 24400 South Harp	per Road, Pecul	iar, MO 64078	
County Plant Number: 037-0063			
Reporting Period: October 1, 2005 to D	ecember 31, 20	05	
Reporting Under: 40 CFR Part 60.7(d),	Construction Pe	ermit 122004-017	
Emission Point: UNIT 3			,
CEMS: Teledyne - API Model 200EM NO	0x/02 Analyzer,	SN 135	•
Pollutant Monitored (limit): 15 ppmvd o	of NOx @ 15% O	2, 3-hr average	
Date of Last Audit: 8/11/2005 RATA			•
Total Source Operation Per Emission P		16.5	·
Reasons for Excess Emissions	Code **	Duratio	on (hours)医基定性病毒
Startup/Shutdown	L	<u> </u>	0
Control Equipment Problems	1		0
Process Problems			0
Other Known Excess Emissions *	13	1	.98
Unknown Excess Emissions	<b></b>	 	0
Fuel Problems	<del> </del>		0
Cleaning, Soot-Blowing	<u> </u>		0
Percent Operating Time Above Standar	<u>rd</u>	12	2.0%
<1%			
Code Comments	ing a law along the	Name of the State	
* Low frequency combustor dy			
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Reason for Monitor Downtime	素製。Codential		
CEM Equipment Malfunction	<del> </del>		0
Non-CEM Equipment Malfunction  QA Calibration	12		.00
Other Known CEM Downtime *	13		.33
Unknown CEM Downtime			0
Percent Operating Downtime			.4%
<5%	<del> </del>		. 1 / /
Code Comments and Sandaran and had	a de la companya da		
13 * Monitor out-of-control period.	A disconnected	calibration line resulted i	n a "failed"
calibration and subsequent out-	of-control period.	The out-of-control peri	od, together with very
low operating hours, resulted in	relatively high do	owntime.	
L	<del></del>		
Submitted by: Block Andrews, Director	of Environment	al Services	•
$\widehat{}$			
Signature: Block anhe	Ma	Date:	1/30/06
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# Continuous Emissions Monitoring Quarterly Report Monitor Downtime Form

	Date:	January 26, 2006
Source Name: Aquila - South Harper Peaking Facility		
Reporting Quarter: Forth, 2005		
Emission Point: South Harper Unit 3		
Pollutant Monitored (limit): 15 ppm of NOx		

Downtime Start		Total	Downtime End V		A CAPE DE LA
Date	Time	Minutes	Date	Lime	Reason Code
10/3/2005	1200	221	10/3/2005	1500	13 - out of control
12/1/2005	0500	99	12/1/2005	0700	13 - out of control
12/5/2005	0600	60	12/5/2005	0600	12 - calibration
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			<u> </u>		<u> </u>
Sum Do	wntime	380			

Submitted by	y: Block Andrews, Director of Environmen	ital Services		
Signature:	Block andrews	Date:	1/30/06	

# Continuous Emissions Monitoring Quarterly Report Excess Emissions Form

Date:	January 26, 2006
Source Name: Aquila - South Harper Peaking Facility	-
Reporting Quarter: Forth, 2005	_
Emission Point: South Harper Unit 3	•
Pollutant Monitored (limit): 15 ppm of NOx	

Date	Time Start	Time End	Minutes -	Magnitude : -	Reason Code
12/6/2005	1800	1900	60	15.5	14
12/6/2005	1900	2000	60	15.1	14
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			yarrin Maana		
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Su	m Excess Emission	ons	120		
Sum Excess Emissions Startup/Shutdown			0		

Submitted by	y: Block Andı	rews, Director of Environme	ntal Services		
Signature:	Block	Cenheus	Date:	1/30/06	