



Aquila

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AIR POLLUTION  
CONTROL PGM

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Chris

October 31, 2005

Enforcement Unit  
Missouri Department of Natural Resources  
Air Pollution Control Program  
PO Box 176  
Jefferson City, MO 65102-0176

FILED<sup>3</sup>

MAY 11 2006

Missouri Public  
Service Commission

RE: Aquila - South Harper Peaking Facility, 037-0063  
3<sup>rd</sup> Quarter 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 the attached is the first quarterly report for this newly constructed installation. The operating period covered is from ~~Continuous Emissions Monitor (CEM)~~ provisional acceptance to September 30. Although the CEMS systems are working properly, a few programming changes are still required to fully utilize all of the reporting features of the Data Acquisition and Handling System (DAHS). The attached report is based on manual queries of the quarterly CEMS data.

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

Exhibit No. 77  
Case No(s). EA-2006-0309  
Date 4-27-06 Rptr KR

# Continuous Emissions Monitoring Quarterly Report

Date: October 28, 2005

Installation Name: Aquila - South Harper Peaking Facility

Installation Address: 24400 South Harper Road, Peculiar, MO 64078

County Plant Number: 037-0063

Reporting Period: July 1, 2005 to September 30, 2005

Reporting Under: 40 CFR Part 60.7(d), Construction Permit 122004-017

Emission Point: UNIT 1

CEMS: Teledyne - API Model 200EM NOx/O2 Analyzer, SN 133

Pollutant Monitored (limit): 15 ppmvd of NOx @ 15% O<sub>2</sub>, 3-hr average

Date of Last Audit: 8/10/2005 RATA

Total Source Operation Per Emission Point (hours): 84.4

| Reasons for Excess Emissions          | Code | Duration (hours) |
|---------------------------------------|------|------------------|
| 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 Standard |      | 0.0%             |

<1%

| Code | Comments    |
|------|-------------|
|      | <b>COPY</b> |
|      |             |
|      |             |
|      |             |

| Reason for Monitor Downtime   | Code | Duration (hours) |
|-------------------------------|------|------------------|
| CEM Equipment Malfunction     |      | 0                |
| Non-CEM Equipment Malfunction |      | 0                |
| Calibration                   |      | 0                |
| Other Known CEM Downtime      |      | 0                |
| Unknown CEM Downtime *        |      | 1.5              |
| Percent Operating Downtime    |      | 1.8%             |

<5%

| Code | Comments  |
|------|---|
|      | * This report is the first Excess Emission Report for this new Unit. Some remaining software work is required by the CEMS DAHS vendor in order to fully utilize all reporting features. If further details or information other than that contained in this report is discovered, a follow-up report will be submitted. |

Submitted by: Block Andrews, Director of Environmental Services

Signature: Block Andrews

Date: 10/31/05

## 1

**Date:** October 28, 2005

**Installation Address:** 24400 South Harper Road, Peculiar, MO 64078

**County Plant Number: 037-0063**

Reporting Under: 40 CFR Part 60.7(d), Construction Permit 122004-017

**Emission Point: UNIT 2**

**CEMS: Teledyne - API Model 200EM NOx/O2 Analyzer, SN 134**

Pollutant Monitored (limit): 15 ppmvd of NOx @ 15% O<sub>2</sub>, 3-hr average

**Date of Last Audit: 8/9/2005 RATA**

115.0

<1%

**COPY**

| Reason for Monitor Downtime   | Code | Duration (hours) |
|-------------------------------|------|------------------|
| CEM Equipment Malfunction     |      | 0                |
| Non-CEM Equipment Malfunction |      | 0                |
| Calibration                   |      | 0                |
| Other Known CEM Downtime      |      | 0                |
| Unknown CEM Downtime *        |      | 3.2              |
| Percent Operating Downtime    |      | 2.8%             |

<5%

| Code | Comments  |
|------|---|
|      | * This report is the first Excess Emission Report for this new Unit. Some remaining software work is required by the CEMS DAHS vendor in order to fully utilize all reporting features. If further details or information other than that contained in this report is discovered, a follow-up report will be submitted. |

**Submitted by: Block Andrews, Director of Environmental Services**

Block Andrews

10/31/05

10/31/05

# Continuous Emissions Monitoring Quarterly Report

Date: October 28, 2005

**Installation Name:** Aquila - South Harper Peaking Facility  
**Installation Address:** 24400 South Harper Road, Peculiar, MO 64078  
**County Plant Number:** 037-0063  
**Reporting Period:** July 1, 2005 to September 30, 2005  
**Reporting Under:** 40 CFR Part 60.7(d), Construction Permit 122004-017  
**Emission Point:** UNIT 3  
**CEMS:** Teledyne - API Model 200EM NOx/O2 Analyzer, SN 135  
**Pollutant Monitored (limit):** 15 ppmvd of NOx @ 15% O<sub>2</sub>, 3-hr average  
**Date of Last Audit:** 8/11/2005 RATA

**Total Source Operation Per Emission Point (hours):** 83.6

| Reasons for Excess Emissions          | Code | Duration (hours) |
|---------------------------------------|------|------------------|
| Startup/Shutdown *                    |      |                  |
| 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 Standard |      | 1.2%             |

<1%

| Code | Comments   |
|------|--|
|      | * A 3-hr corrected NOx average of 15.4 was recorded on hour 17 of 8/30/2005. This exceedance appears to include startup/shutdown concentrations, which are not to be included per Construction Permit 122004-017, Condition 2.A. If new details concerning this "exceedance" are discovered, a follow-up report will be submitted. |

| Reason for Monitor Downtime   | Code | Duration (hours) |
|-------------------------------|------|------------------|
| CEM Equipment Malfunction     |      | 0                |
| Non-CEM Equipment Malfunction |      | 0                |
| Calibration                   |      | 0                |
| Other Known CEM Downtime      |      | 0                |
| Unknown CEM Downtime **       |      | 1.2              |
| Percent Operating Downtime    |      | 1.4%             |

<5%

| Code | Comments   |
|------|--|
|      | ** This report is the first Excess Emission Report for this new Unit. Some remaining software work is required by the CEMS DAHS vendor in order to fully utilize all reporting features. If further details or information other than that contained in this report is discovered, a follow-up report will be submitted. |

**Submitted by:** Block Andrews, Director of Environmental Services

**Signature:** Block Andrews

**Date:** 10/31/05