

FILED
April 30, 2024
Data Center
Missouri Public
Service Commission

Exhibit No. 113

Staff – Exhibit 113
Whitworth Declaration
File No. EF-2024-0021

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)
)
 Plaintiff,)
)
 v.)
)
 AMEREN MISSOURI,)
)
 Defendant.)

Case No. 4:11-CV-00077-RWS
Judge Rodney W. Sippel

AMEREN MISSOURI'S SUMMARY JUDGMENT MOTIONS

EXHIBIT A1

FILED UNDER SEAL PURSUANT TO ECF # 90

PART 1 OF 3

Staff Exhibit No. 113
Date 4-14-24 Reporter TV
File No. EP-2024-0021

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)
)
 Plaintiff,)
)
 v.)
)
 AMEREN MISSOURI,)
)
 Defendant.)
)

Case No. 4:11-CV-00077-RWS

Judge Rodney W. Sippel

DECLARATION OF STEVEN WHITWORTH

I, Steven Whitworth, am over 18 years of age and make the following declaration pursuant to 18 U.S.C. § 1746:

1. I make this declaration on behalf of Ameren Missouri (“Ameren”) based on my personal knowledge, and the records of Ameren or information available through employees of Ameren. I am prepared to testify to the following facts if called as a witness.

2. I am employed by Ameren Services Company, which provides services to Ameren Corporation’s operating companies, including Ameren Missouri (which I will generally refer to below as “Ameren”). I have worked in Ameren’s Environmental Services Department for over 16 years, and since 2007 I have managed and directed that Department. My title is Senior Director, Environmental Policy and Analysis. I am familiar with Ameren’s emissions assessments for the 2007 and 2010 Projects at issue in this case.

Assessment of Projects for Construction Permitting Applicability

3. Ameren’s Environmental Services Department (“Environmental Services”) plays a lead role in evaluating whether environmental permits are required for activities Ameren

undertakes, including whether major New Source Review (“NSR”) or other construction permits are required under the Missouri State Implementation Plan (“SIP”) Construction Permitting Rule, 10 C.S.R. 10-6.060. Typically, we reach a consensus decision within Environmental Services on permit applicability through collaborative discussion.

4. To assess the nature of a project and to determine whether it should be considered for air construction permitting, Environmental Services typically works in conjunction with Ameren engineering personnel in the Project Engineering and Performance Engineering departments. We will also consult other Ameren departments (for example, Corporate Planning) as needed.

5. Environmental Services staff have considerable knowledge and experience with assessing permit applicability regarding all manner of projects at Ameren, including component replacements at Ameren’s power plants, like Rush Island. We used that prior experience with similar activities in assessing any emission impact of the 2007 and 2010 Projects.

6. Environmental Services also relies on the subject matter expertise of our engineering colleagues to identify projects that have the potential, from an engineering point of view, to result in emissions increases, due to their nature and scope. Ameren had conducted dozens of similar boiler component replacement projects at its other plants prior to performing the 2007 and 2010 Projects. Our experience with and knowledge gained from those similar projects informed our decision-making and analysis with respect to the 2007 and 2010 Projects.

7. Ameren assesses the impact that a project is expected to have on unit operations well before beginning construction, as part of its project planning and justification processes. Consistent with normal practice, Ameren assessed the expected impact of the 2007 and 2010 Projects before beginning construction of those projects.

Ameren's Emissions Assessment for the 2007 Projects at Rush Island Unit 1

8. Ameren conducted a planned unit outage at Rush Island Unit 1 from approximately February to May 2007. During this outage, I understand that Ameren performed nearly 100 discrete projects. I understand that just four of those projects are at issue in this case: the replacements of the reheater, economizer, lower slope and air preheater components (the "2007 Projects"). While Ameren made emissions assessments with respect to all of the activities taking place during the 2007 Outage as a whole, to simplify the following discussion, I will refer to the 2007 Projects.

9. I understand from David Boll, currently Ameren's Consulting Engineer in Ameren's Environmental Project Engineering Department, that before the 2007 Outage, Ameren engineering personnel assessed the nature and scope of the 2007 Projects and the other projects planned to be undertaken during the 2007 Outage, and concluded that none of those projects would increase the unit's maximum annual rated design capacity given continuous year-round operations. Based on our considerable experience with NSR permitting under the Missouri SIP, and the language of the SIP, we understand that such projects would not increase the unit's annual rate of potential emissions, and therefore did not constitute "modifications" under the Missouri SIP. Accordingly, we determined that such Projects would not trigger the application of the Missouri Construction Permit Rule, meaning no construction permit was required.

10. As explained in Mr. Boll's declaration, Ameren engineering personnel had also determined that the 2007 Projects were routine in nature because, among other reasons, they were like-kind replacements of existing components with new components that were functionally equivalent. Ameren was aware that such replacements were commonly performed throughout the industry. I and my colleagues in Environmental Services knew that Ameren had conducted

dozens of similar component replacements at its other generating units in prior years. Accordingly, I and my colleagues in Environmental Services determined, prior to the 2007 Projects, that Ameren's routine boiler component replacements such as the 2007 Projects constituted routine maintenance repair and replacement activities that are excluded from NSR permitting under the Missouri SIP.

11. In addition to assessing the applicability of the Missouri SIP and whether the 2007 Projects constituted routine maintenance repair and replacement, Ameren also assessed any impact of the Projects on projected actual future emissions. We had experience with and knowledge of the similar projects described above, and were familiar with the Rush Island units' operational characteristics. This included our knowledge that Ameren's coal-fired generating units operate below their available capacity and thus have a large amount of unused capacity to generate. Based on these and other considerations derived from our experience, knowledge and judgment, and based on the judgment of Ameren's engineering personnel, we in Environmental Services concluded that the 2007 Projects would not cause actual emissions to increase.

Ameren's Emissions Assessment for the 2010 Projects at Rush Island Unit 2

12. Ameren conducted a planned unit outage at Rush Island Unit 2 from approximately January to April 2010. During this outage, I understand that Ameren performed over 100 discrete projects. I understand that only 3 of these projects are at issue: the replacements of the reheater, economizer, and air preheater components of Rush Island Unit 2 (the "2010 Projects"). While Ameren made emissions assessments with respect to all of the activities taking place during the 2010 Outage as a whole, to simplify the following discussion, I will refer only to the 2010 Projects.

13. I understand from Mr. Boll that before the 2010 Outage, Ameren engineering personnel assessed the nature and scope of the 2010 Projects and the other projects planned to be

undertaken during the 2010 Outage, and concluded that none of those projects would increase the unit's maximum annual rated design capacity given continuous year-round operations. Based on our considerable experience with NSR permitting under the Missouri SIP, and the language of the SIP, we in Environmental Services understand that such projects would not increase the unit's annual rate of potential emissions, and therefore did not constitute "modifications" under the Missouri SIP. Accordingly, we determined that such Projects would not trigger the application of the Missouri Construction Permit Rule, meaning no construction permit was required.

14. As explained in Mr. Boll's declaration, Ameren engineering personnel had also determined that the 2010 Projects were routine in nature because, among other reasons, they were like-kind replacements of existing components with new components that were functionally equivalent. Ameren was aware that such replacements were commonly performed throughout the industry. I and my colleagues in Environmental Services knew that Ameren had conducted dozens of similar component replacements at its other generating units in prior years. Accordingly, I and my colleagues in Environmental Services determined, prior to the 2010 Projects, that Ameren's routine boiler component replacements such as the 2010 Projects constituted routine maintenance repair and replacement activities that are excluded from NSR permitting under the Missouri SIP.

15. In addition to assessing the applicability of the Missouri SIP and whether the 2010 Projects constituted routine maintenance repair and replacement, Ameren also assessed any impact of the Projects on projected actual future emissions. We had experience with and knowledge of the similar projects described above, and were familiar with the Rush Island units' operational characteristics. This included our knowledge that Ameren's coal-fired generating

units operate below their available capacity and thus have a large amount of unused capacity to generate. Based on these and other considerations derived from our experience, knowledge and judgment, and based on the judgment of Ameren's engineering personnel, we in Environmental Services concluded that the 2010 Projects would not cause actual emissions to increase.

16. In addition to the foregoing assessment of actual emissions, Ameren also documented an assessment of whether there was a reasonable possibility, within the meaning of the relevant rules, that the 2010 Projects would increase emissions from the unit. The Missouri state permitting rules had changed in late 2009, requiring Missouri operators to perform in certain instances a numerical calculation of emissions, a requirement that had not applied under either the applicable state or federal regulations prior to that. While we believed (see above) that no construction permit of any kind was required under the Missouri Construction Permitting Rule, and that the 2010 Projects were excluded from New Source Review permitting because they constituted routine maintenance repair and replacement, we nonetheless prepared a numerical calculation out of an abundance of caution.

17. To determine whether there was a reasonable possibility of an emissions increase from the 2010 Outage, Environmental Services prepared a numerical emissions projection. A true and correct copy of the results of that projection, titled "Rush Island Unit 2 – Spring 2010 Outage – Reasonable Possibility Analysis Summary" is attached hereto as Attachment 1. (The document attached as Attachment 1 is the summary or conclusion page of a much larger document containing all the details of Ameren's analysis. Ameren produced the entire analysis during discovery in this case, but given its volume has not attached it here. Ameren stands ready to provide it to the Court upon request.)

18. Pursuant to 40 C.F.R. 52.21(b)(48) (as incorporated by reference in the Missouri SIP at 10 C.S.R. 10-6.060(8)), Ameren first calculated Unit 2's "baseline actual emissions" rate by taking the average annual rate from the 24-month period of April 2005 through March 2007. That rate was 14,288 tons per year.

19. Pursuant to 40 C.F.R. 52.21(b)(41)(i) (incorporated by reference in the Missouri SIP at 10 C.S.R. 10-6.060(8)), Ameren then determined Unit 2's "maximum annual rate" of future actual emissions in the five years following the date Unit 2 would resume regular operation after the 2010 Outage. That maximum annual rate was 16,818.88 tons per year. In Attachment 1, this is shown under the column labeled "Projected Actual Emissions (tons/year)." This calculation of emissions following the Projects did not yet account for causation, which the NSR regulations require be accounted for through application of the "capable of accommodating" provision.

20. We did not believe that any relevant fugitive emissions were quantifiable, and so did not project them according to 40 C.F.R. 52.21(b)(41)(ii)(b) (incorporated by reference in the Missouri SIP at 10 C.S.R. 10-6.060(8)). Emissions associated with startups, shutdowns and malfunctions were included in the projection of the maximum annual rate of projected future emissions following the 2010 Outage.

21. Finally, as required pursuant to the "capable of accommodating" provision (sometimes called the demand growth provision), 40 C.F.R. 52.21(b)(41)(ii)(c) (as incorporated by reference in the Missouri SIP at 10 C.S.R. 10-6.060(8)), Ameren determined the amount of emissions following the 2010 Projects that was unrelated to the 2010 Projects. We initially determined the amount of emissions that Unit 2 could have accommodated during the baseline period above and beyond those it actually emitted during the baseline period. That amount was

3,275.11 tons per year. In Attachment 1, this is shown under the column labeled “Capable of Accommodating Emissions (tons/year).”

22. Ameren determined that additional amount of SO₂ emissions (3,275 tons per year) was unrelated to the Projects because it could have been emitted during the baseline period and was related to: (a) increased utilization due to increased market demand, up to a level not exceeding the unused capacity that actually was available during the baseline period; and/or (b) normal variations in hourly emissions rates due to a combination of factors unrelated to the 2010 Projects, none of which were expected to affect hourly emissions rates.

23. To determine the amount of emissions (if any) following the Projects that were related to the Projects, Ameren then excluded (*i.e.*, subtracted) a portion (2,531.15 tons per year, “Excluded Emissions” on Attachment 1) of the unrelated SO₂ emissions from the difference between baseline emissions (14,287.73 tons per year) and the emissions following the Projects (16,818.88 tons per year).

24. The result of this calculation was zero, and is shown as the “Net Change” on Attachment 1. Stated mathematically: 16,818.88 *minus* 14,287.73 *minus* 2,531.15 *equals* 0.00, the emissions related to the Project. (We did not subtract all 3,275.11 tons per year of unrelated emissions because that would have resulted in a negative number.)

25. Because, after following the requirements of the regulation, any amount of projected SO₂ emission increase related to the 2010 Projects was less than the 40-ton significance threshold for SO₂, Ameren determined that the 2010 Projects (and the 2010 Outage as a whole) would not cause a significant increase in emissions of SO₂.

26. Pursuant to 40 C.F.R. 52.21(b)(41)(ii)(a) (incorporated by reference in the Missouri SIP at 10 C.S.R. 10-6.060(8)), when determining the annual rate of “projected actual

emissions,” (as defined under 40 C.F.R. 52.21(b)(41)(i), Ameren considered all relevant information. In addition to the considered judgment and expertise of Environmental Services, we relied (as described above) on the judgment and expertise of Ameren’s engineering personnel, performance engineering personnel, and Corporate Planning department, among others. Ameren considered all relevant information regarding Unit 2’s historical operational data, Unit 2’s expected business activity and Ameren’s highest projections of business activity. Ameren also considered the amount of unused, but available generating capacity that was available to it during the baseline period, and which Unit 2 could have utilized had the market called upon it to do so. Ameren also considered the normal variations in hourly emission rates that occur during the normal operations of Unit 2.

27. Ameren retained records of this calculation. Since well before the Projects took place, Ameren reports the SO₂ emissions from both Rush Island units to EPA as part of its submission of CEMS data (see below).

Rush Island Emissions and Generation Over Time

28. Ameren’s Environmental Services Department plays a role in monitoring the emissions of each of Ameren’s plants, including Rush Island.

29. Rush Island’s Continuous Emissions Monitor Systems (CEMS) measure and record emissions data on a continuous basis during Rush Island’s operations. Ameren gathers that data and reports it to EPA. EPA keeps this data in databases and publishes it on the internet, where it can be accessed by the general public. The CEMS data contains multiple data points in addition to emissions, including gross generation. I am familiar with CEMS Data and use it routinely in carrying out my job responsibilities.

30. I reviewed the CEMS data for SO₂ emissions, NO_x emissions, and gross generation over time. As the below table demonstrates, compared to 1990 levels, Rush Island’s

annual emissions of SO₂ in 2014 were just 39% of their 1990 levels, a decrease of over 27,500 tons per year. That decrease came about even though Rush Island's annual generation of electricity has increased and is now 152% of their 1990 levels, an increase of over 3 gigawatt-hours per year. Likewise, Rush Island's emissions of NO_x are at just 28% of their 1995 levels, a decrease of nearly 9,000 tons per year.

Rush Island Generation and Emissions 1990-2014

	(MWH)	(TPY)	(TPY)	(MWH)	(TPY)	(TPY)
1990	2,786	21,343	-	3,101	23,609	-
1995	3,614	21,412	4,593	2,821	22,209	7,734
1996	3,401	13,225	4,077	3,917	14,044	3,922
1997	3,735	13,484	3,826	3,222	11,659	3,032
1998	3,936	13,485	3,396	4,281	13,924	3,710
1999	3,721	12,653	2,711	4,276	14,543	2,981
2000	4,228	13,643	2,801	4,107	13,257	2,589
2001	3,169	8,963	1,824	3,794	10,912	2,295
2002	4,426	12,744	2,092	3,506	10,511	1,900
2003	4,565	13,127	1,928	3,797	11,866	1,856
2004	3,916	11,725	1,602	3,995	11,193	1,665
2005	4,467	14,070	1,971	4,952	14,315	2,098
2006	4,613	14,584	1,991	4,638	14,090	1,976
2007	2,936	9,126	1,268	4,484	13,336	2,019
2008	4,794	15,492	2,086	4,456	14,102	2,106
2009	4,484	14,754	1,927	4,000	13,573	1,934
2010	4,506	14,964	1,935	3,360	11,103	1,449
2011	3,802	12,272	1,587	4,853	15,764	1,853
2012	4,455	10,642	1,549	4,097	9,780	1,405
2013	4,359	9,595	1,525	4,581	9,992	1,542
2014	4,161	8,846	1,456	4,171	8,598	1,394

Rush Island Emissions Variations Over Time


31. The amount of SO₂ emitted at Rush Island varies significantly from year to year. In my experience, such fluctuations are normal at coal-fired power plants and are caused by a variety of factors including variations in market demand. I have reviewed the emissions data for Rush Island for the decade from 1996 to 2006. I then determined the changes in emissions from year-to-year. Below is an accurate summary of the amount of SO₂ emitted at Rush Island from 1996 to 2006.

Rush Island SO₂ Emissions Variations Over Time

Year	Unit 1		Unit 2	
	SO ₂ Emissions	Change from previous year	SO ₂ Emissions	Change from previous year
1996	13,225	--	14,044	--
1997	13,484	259	11,659	-2,385
1998	13,485	1	13,924	2,265
1999	12,653	-832	14,543	619
2000	13,643	990	13,257	-1,286
2001	8,963	-4,680	10,912	-2,345
2002	12,744	3,781	10,511	-401
2003	13,127	383	11,866	1,355
2004	11,725	-1,402	11,193	-673
2005	14,070	2,345	14,315	3,122
2006	14,584	514	14,090	-225


32. I reviewed the SO₂ emissions data for Rush Island Unit 1 for 2007 to 2014. I have provided a chart of the SO₂ emissions by year for the unit, below. The data for 2007 only includes a partial year of service because the plant was not operating during the Spring 2007 outage. Annual emissions are now about 5,000 tons per year below their averages before the 2007 Projects.

Unit 1 SO₂ Emissions After the 2007 Projects

	
2007	9,126
2008	15,492
2009	14,754
2010	14,964
2011	12,272
2012	10,642
2013	9,595
2014	8,846

33. I reviewed the SO₂ emissions data for Rush Island Unit 2 for 2010 to 2014. I have provided a chart of the SO₂ emissions by year for the unit, below. The data for 2010 only includes a partial year of service because the plant was not operating during the Spring 2010 outage. As with Unit 1, annual emissions are now about 5,000 tons per year below their averages before the 2010 Projects.

Unit 2 SO₂ Emissions After the 2010 Projects

	
2010	11,103
2011	15,764
2012	9,780
2013	9,992
2014	8,598

Title V

34. Environmental Services is responsible for obtaining and securing the renewal of Title V Permits for the Rush Island plant. The applicable permit for the Rush Island units at the

time of the 2007 and 2010 outages, Operating Permit No. OP2000061, was issued on May 18, 2000. A true and correct copy of the Title V permit is attached hereto as Attachment 2 (AM-02511339).

35. It is my understanding that before issuing a Title V Permit, the Missouri Department of Natural Resources provides the draft permit to EPA for comment or objection. EPA did not make any objection to Ameren's Title V operating permit before it was issued on May 18, 2000.

36. Generally, Title V permits have a 5-year term length. Although Title V permits must be renewed before they expire, because of permitting delays, permit renewals often take years to complete.

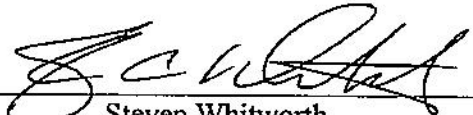
37. On or about November 18, 2004, Ameren filed an application to renew the May 18, 2000 Title V permit (Permit No. OP2000061).

38. On or about May 29, 2010, the Missouri Department of Natural Resources provided EPA a copy of the draft Rush Island Title V Permit. EPA did not object to the permit renewal.

39. On August 30, 2010, MDNR renewed Ameren's Title V Permit for the Rush Island Units, Operating Permit No. OP2010-047. A true and correct copy of the Title V permit is attached hereto as Attachment 3 (AM-00424093).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 23, 2015


Steven Whitworth

ATTACHMENT 1

**Rush Island Unit 2
Spring 2010 Outage
Reasonable Possibility Analysis Summary**

Unit	Pollutant	Baseline Emissions (tons/year)	Projected Actual Emissions (tons/year)	Capable of Accommodating Emissions (tons/year)	Excluded Emissions (tons/year)	Net Change (tons/year)	Significance Level (tons/year)	Significant (Yes/No)
Rush Island 2	NO _x	2,099.73	2,522.83	459.51	423.10	-	40	No
	SO ₂	14,287.73	16,818.88	3,275.11	2,531.15	-	40	No
	PM ₁₀	56.24	67.73	11.28	11.28	0.20	15	No

Notes:

Baseline NOx emissions based on CEMS data from November 2007 to October 2009.

Projected Actual NOx emission based on ProSym modeling of projected loads and average emission rate during 5 year lookback period.

NOx emissions the unit was capable of accommodating based on unit equivalent availability during the baseline period and representative hourly emission rates during the baseline period.

Excluded emissions are the emissions the unit was capable of accommodating up to but not exceeding the difference between the baseline emissions and the projected future emissions.

Baseline SO2 emissions based on CEMS data from April 2005 to March 2007

Projected Actual SO2 emission based on ProSym modeling of projected loads and average emission rate during 5 year lookback period.

SO2 emissions the unit was capable of accommodating based on unit equivalent availability during the baseline period and representative hourly emission rates during the baseline period.

PM10 baseline emissions based on heat input data recorded by CEMS for the period April 2005 to March 2007 and a stack test from 2004.

PM10 projected actual emissions based on ProSym modeling of projected loads and 2004 stack test data.

PM10 emissions the unit was capable of accommodating is based on unit equivalent availability during the baseline period and representative heat input data and 2004 stack test data.

ATTACHMENT 2

STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

Mel Carnahan, Governor • Stephen M. Mahfood, Director

DIVISION OF ENVIRONMENTAL QUALITY

P.O. Box 176 Jefferson City, MO 65102-0176

PERMIT TO OPERATE

Under the authority of RSMo 643 and the Federal Clean Air Act the applicant is authorized to operate the air contaminant source(s) described below, in accordance with the laws, rules, and conditions set forth here in.

Operating Permit Number: OP2000061
Expiration Date: May 18, 2005
Project Number: 099-0016-020

Installation Name and Address

Union Electric Rush Island Plant
Highway 61 at AA via Big Hollow Road
Festus, MO 63028
Jefferson County

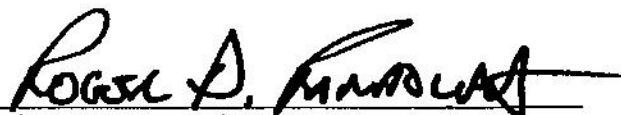
Parent Company's Name and Address

Union Electric Company
P.O. Box 66149 (MC-602)
St. Louis, MO 63166

Installation Description: Union Electric Company's (doing business as AmerenUE) Rush Island Plant is a power plant that converts the energy from coal and other fuels to electrical energy. The Union Electric-Rush Island Plant Power Plant is located in Jefferson County, Missouri at highway 61 at AA by way of Big Hollow road. The installation has coal unloading, conveying, stockpiles and pulverizing equipment to supply the coal burning boilers. The primary emission sources, Unit 1 and Unit 2 are boilers that are primarily fueled with coal. Fuel oil is utilized for ignition, flame stabilization and supplemental load. The boilers produce steam that powers electrical generating equipment. Equipment for fly-ash and bottom ash disposal are on site. The installation has an oil fired auxiliary boiler.

MAY 18 2000

Effective Date



Director or Designee
Department of Natural Resources

Table of Contents

I. INSTALLATION DESCRIPTION AND EQUIPMENT LISTING.....	4
INSTALLATION DESCRIPTION:.....	4
EMISSION UNITS WITH LIMITATIONS.....	4
EMISSION UNITS WITHOUT LIMITATIONS.....	5
DOCUMENTS INCORPORATED BY REFERENCE.....	5
II. PLANT WIDE EMISSION LIMITATIONS	6
Permit Condition PW001	6
10 CSR 10-6.170	6
Permit Condition PW002	7
Construction Permit Number 0992-017A.....	7
Permit Condition PW003	8
10 CSR 10-5.030	8
Permit Condition PW004	8
10 CSR 10-6.250	8
Permit Condition PW005	9
10 CSR 10-6.080	9
40 CFR Part 61 Subpart M.....	9
III. EMISSION UNIT SPECIFIC EMISSION LIMITATIONS	10
EU0010 and EU0020	10
Permit Condition EU0010 and EU0020-01	10
10 CSR 10-5.030	10
Permit Condition EU0010 and EU0020-02	13
10 CSR 10-5.090 and 10 CSR 10-6.220.....	13
Permit Condition EU0010 and EU0020-03	14
10 CSR 10-6.260	14
EU0030.....	15
Permit Condition EU0030-01.....	15
10 CSR 10-5.030	15
Permit Condition EU0030-02.....	16
10 CSR 10-5.090 and 10 CSR 10-6.220.....	16
Permit Condition EU0030-03.....	18
10 CSR 10-6.260	18
EU0060.....	19
Permit Condition EU0060-01	19
10 CSR 10-6.260	19
EU0070.....	20
Permit Condition EU0070-01.....	20
10 CSR 10-5.090 and 10 CSR 10-6.220.....	20
EU0080.....	22
Permit Condition EU0080-01.....	22
10 CSR 10-5.300	22
IV. CORE PERMIT REQUIREMENTS	24
V. GENERAL PERMIT REQUIREMENTS	27
PERMIT DURATION	27
GENERAL RECORD KEEPING AND REPORTING REQUIREMENTS	27

RISK MANAGEMENT PLANS UNDER SECTION 112(R).....	28
SEVERABILITY CLAUSE.....	28
GENERAL REQUIREMENTS.....	28
INCENTIVE PROGRAMS NOT REQUIRING PERMIT REVISIONS.....	29
REASONABLY ANTICIPATED OPERATING SCENARIOS.....	29
TITLE IV ALLOWANCES.....	29
COMPLIANCE REQUIREMENTS.....	29
PERMIT SHIELD.....	30
EMERGENCY PROVISIONS.....	31
OPERATIONAL FLEXIBILITY.....	31
OFF-PERMIT CHANGES.....	32
RESPONSIBLE OFFICIAL.....	32
STATEMENT OF BASIS.....	33
Attachment A.....	34
Attachment B.....	35
Attachment D.....	36
Attachment E.....	39
Attachment F.....	43
Attachment G.....	47
Attachment H.....	48
Attachment I.....	49
Attachment J.....	50
Attachment K.....	51
Attachment L.....	52

I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION:

Union Electric Company's (doing business as AmerenUE) Rush Island Plant is a power plant that converts the energy from coal and other fuels to electrical energy. The Union Electric-Rush Island Plant Power Plant is located in Jefferson County, Missouri at highway 61 at AA by way of Big Hollow road. The installation has coal unloading, conveying, stockpiles and pulverizing equipment to supply the coal burning boilers. The primary emission sources, Unit 1 and Unit 2 are boilers that are primarily fueled with coal. Fuel oil is utilized for ignition, flame stabilization and supplemental load. The boilers produce steam that powers electrical generating equipment. Equipment for fly-ash and bottom ash disposal are on site. The installation has an oil fired auxiliary boiler.

EMISSION UNITS WITH LIMITATIONS

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

<u>Emission Unit #</u>	<u>Description of Emission Unit</u>
EU0010	Tangential coal fired boiler Combustion Engineering CE #7770 Date of Manufacturer 06-18-71 5922 MMBTU/HR Stack ID -1 Control Device CD1 Device Code 010 Electrostatic precipitator Control Device CD1A Device Code 024 Low NO _x Burners Coal or fuel oil fired
EU0020	Tangential coal fired boiler Combustion Engineering CE #1771 Date of Manufacturer 06-18-71 5922 MMBTU/HR Stack ID -2 Control Device CD2 Device Code 010 Electrostatic precipitator Control Device CD2A Device Code 024 Low NO _x Burners Coal or fuel oil fired
EU0030	Auxiliary Boiler Combustion Engineering Model 23-A-14 Date of Manufacturer 6-71 135 MMBTU/HR Stack ID -3
EU0060	Emergency Diesel Generator General Motors 12-645E1 Date of Manufacture 10-72 Stack ID -4
EU0070	12 Coal Storage Silos Control Device CD7 Device Code 008 Cyclones Manufactured by Industrial Clean Air Cyclone Numbers 1A, 1B, 1C, 2A, 2B, & 2C

EU0080 Parts Washers(Cold Cleaners)
 Equipment is serviced by contractors
 size and manufactured date varies

EMISSION UNITS WITHOUT LIMITATIONS

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

Description of Emission Source

M1 Coal Unloading
 Control Device CDM1 Device Code 061 water spray

M2 Coal Storage Pile 26 acres

M3 Coal Transferring & Conveying
 Control Device CDM3 Device Code 061 water spray

1-200,000 gallon fuel oil storage tank
1-15,000 gallon fuel oil tank
1-4000 gallon used oil tank
1-1000 gallon above ground gasoline tank
2-12,000 gallon lube oil tanks
1-16,000 gallon lube oil tank
2-7,000 gallon main turbine lube oil reservoirs
4-650 gallon boiler feed pump oil reservoirs
Emergency generator fuel oil tank
12-110,000 BTU portable oil fired heaters
2-fuel oil pressure washers
2-oil fired torpedo heaters
2 gasoline powered generators
A gasoline powered air compressor
Turbine lube oil reservoir vapor extraction vents
2- boiler feed pump turbine lube oil reservoir extraction vents
Generator hydrogen seal oil vapor extraction vents
Bio-venting of subsurface number 2 diesel fuel oil

DOCUMENTS INCORPORATED BY REFERENCE

These documents have been incorporated by reference into this permit.

- 1) Construction Permit 0992-017A(SO₃ Injection System)
- 2) 1997 EIQ
- 3) Title Five Operating Permit Application
- 4) March 01, 1996 Letter from Steve Feeler, Chief of Enforcement Air Pollution Control Program to Mr. Michael L. Menne, Supervisor, Environmental Services Union Electric Company

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.

Permit Condition PW001	
10 CSR 10-6.170	
Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin	
<i>Emission Limitation:</i>	<p>No person may 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 to go beyond the premises of origin in quantities that the particulate matter:</p> <ul style="list-style-type: none">• Remains visible in the ambient air beyond the property line of origin; or• May be found on surfaces beyond the property line of origin. <p>The nature or origin of the particulate matter shall be determined by microscopy or other technique proven to be equally accurate and approved by the Director. The staff director may allow an exemption for unusual and adverse weather conditions for any activity that would otherwise be a violation. These conditions may include, but are limited to high winds, extended dry weather periods and extreme cold weather.</p>
<i>Monitoring:</i>	<p>To the extent practicable, the permittee shall conduct inspections of its installation sufficient to determine compliance with this regulation. The source representative would maintain a log noting 1) whether fugitive particulate matter emissions (except for water vapor) remain visible in the ambient air beyond the property line of origin; and 2) whether the visible emissions were normal for the installation. If no visible or other significant emissions are observed, then no further progressive observations would be required, this inspection.</p> <p>If a violation of this regulation is discovered, the source representative would indicate in the log the cause of the abnormal emissions and any corrective action(s) taken. The source representative will also indicate the total duration of any visible emission incident as part of the log described above.</p> <p>Weekly observations shall be conducted for a minimum of eight (8) consecutive weeks. Should no violations of this regulation be observed in that time period, then periodic observations shall be conducted every other week for a period of two (2) calendar months. Should no violations be observed in this time period, then periodic observations need be done no more often than once per month. Should violations be observed, then:</p> <ul style="list-style-type: none">• The frequency of periodic monitoring will revert to weekly, though the frequency of monitoring would follow the reduction in frequency of monitoring as just outlined, provided no further violations were observed.• The permittee will take whatever steps are necessary to bring the installation back in to compliance with this regulation. These measures will be implemented as soon as is practicable.
<i>Record Keeping:</i>	<p>The permittee shall maintain records of any exceedances of any of the terms imposed by this regulation, or equipment malfunctions which could possibly cause an exceedance of this regulation. Attachment A, or an equivalent record keeping sheet shall be used to record all information required by this rule. All records must be maintained for a minimum of five (5) years.</p>

Reporting:

The permittee shall report to the Air Pollution Control Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.

Permit Condition PW002

Construction Permit Number 0992-017A

Emission Limitation:

The control system for the SO₃ injection system shall be operated in a manner that promotes the maximum particulate matter collection efficiency of the electrostatic precipitators and in accordance with construction permit 0992-017A.

Each of the two (2) steam generating units shall emit particulate matter at no greater rate than 0.12 pounds per million BTU of heat input as set forth in Missouri regulation 10 CSR 10-5.030.

Each of the two (2) steam generating units shall not emit exhaust gas with an opacity of 20% or greater as set forth in Missouri regulation 10 CSR 10-5.090.

Monitoring:

The installation shall monitor the opacity and sulfur dioxide emission rate as described in the construction permit. The injection system equipment shall be maintained in good working condition at all times.

Record Keeping:

This installation shall keep records of all six (6) minute average opacity readings in percent as read by transmissometer for each unit. The beginning time for each 6-minute period shall be noted in the records.

The installation shall keep records of all one (1) hour average SO₂ emissions rates in pounds per million BTU's of heat input for each unit. The beginning time for each one (1) hour period shall be noted in the records.

Reporting:

The permittee shall report to the Air Pollution Control Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, an exceedance or noncompliance demonstrated by the appropriate record keeping forms or requirements set forth in this condition. In accordance with the construction permit, this report will be submitted within thirty (30) days of the end of the calendar quarter.

Permit Condition PW003	
10 CSR 10-5.030	
Maximum Allowable Emission of Particulate Matter from Fuel Burning Equipment Used for Indirect Heating	
<i>Emission Limitation:</i>	The permittee shall not emit particulate matter in excess of 0.12 pounds per million BTU of heat input, for units 1 (EU0010) and 2 (EU0020). The auxiliary boiler (EU0030) limit is 0.31 pounds particulate per million BTU. Provisions in this rule 10 CSR 10-5.030 (2)(A) allows for independent consideration of additional equipment added to the installation.
<i>Monitoring:</i>	This is an installation wide applicable requirement, but periodic monitoring requirements vary for each individual indirect heating source subject to this rule (see the Emission Unit Specific Emission Limitations section for individual emission unit specific periodic monitoring requirements).
<i>Record Keeping:</i>	Maintain a written or electronic record of all inspections and any action resulting from an inspection. Periodic monitoring requirements vary for each individual indirect heating source subject to this rule. The record keeping requirements found in the Emission Unit Specific Emission Limitations section shall be utilized if plant wide heat input information is desired.
<i>Reporting:</i>	The permittee shall report to the Air Pollution Control Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after any exceedance or non-compliance of 10 CSR 10-5.030 demonstrated by the requirements set forth in this condition.

Permit Condition PW004	
10 CSR 10-6.250	
Asbestos Abatement Projects - Certification, Accreditation, and Business Exemption Requirements	
<i>Emission Limitation:</i>	The permittee shall conduct all asbestos abatement projects within the procedures established for certification and accreditation by 10 CSR 10-6.250. <ul style="list-style-type: none">• An individual must receive certification from the department before that individual participates in an asbestos abatement project operating in Missouri according to Section (3). This certification is annually renewable. Certification as an AHERA inspector, AHERA management planner and AHERA project designer apply to AHERA-related projects.• To be a training provider for the purpose of this rule a school shall apply for accreditation to the department and comply with the United States Environmental Protection Agency AHERA Model Accreditation plan 40 CFR part 763 Appendix C, subpart E. Details of the requirements for accreditation are found in Section (4).
<i>Monitoring:</i>	Any appropriate monitoring to demonstrate compliance with Certification and Accreditation standards.
<i>Record keeping:</i>	Any appropriate record keeping to demonstrate compliance with Certification and Accreditation standards.
<i>Reporting:</i>	Any appropriate reporting to demonstrate compliance with Certification and Accreditation standards.

<p style="text-align: center;">Permit Condition PW005</p>
<p style="text-align: center;">10 CSR 10-6.080</p>
<p>Emission Standards for Hazardous Air Pollutants</p>
<p style="text-align: center;">40 CFR Part 61 Subpart M</p>
<p>National Emission Standard for Asbestos</p>
<p><i>Emission Limitation:</i> 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, <i>National Emission Standard for Asbestos</i>.</p>
<p><i>Monitoring:</i> Any appropriate monitoring to demonstrate compliance with registration, certification, notification, and Abatement Procedures and Practices standards as specified in 40 CFR Part 61, Subpart M.</p>
<p><i>Record keeping:</i> Any appropriate record keeping as specified in 40 CFR Part 61, Subpart M.</p>
<p><i>Reporting:</i> Any appropriate reporting as specified in 40 CFR Part 61, Subpart M.</p>

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.

EU0010 and EU0020 Boilers Unit 1 and Unit 2
--

General Description:	Tangential coal fired boilers
Manufacturer/Model #:	Unit 1 and 2 are Combustion Engineering boilers # 7770 and #1771
EIQ Reference # (1997):	EP#=B1 and EP#=B2

Permit Condition EU0010 and EU0020-01
10 CSR 10-5.030
Maximum Allowable Emission of Particulate Matter from Fuel Burning Equipment Used for Indirect Heating
<i>Emission Limitation:</i> The permittee shall not emit particulate matter in excess of 0.12 pounds per million BTU of heat input. Exception: Except as defined for 10 CSR 6.050, Start Up, Shutdown, and Malfunction Conditions." Operation of the control device must be maintained using standard manufacturer recommendations.

Monitoring:

Periodic monitoring, as defined below, is not required during periods of time greater than one (1) day in which the source does not operate. The control device is required to be operated and maintained within the operating and maintenance plan of this installation. The control device is required to be in service and operational when EU0010 and EU0020 is/are operating.

A record of the initial stack test and other stack testing conducted on each unit or any subsequent testing will be maintained and made available immediately for inspection to the department of Natural Resources upon request. The permittee shall monitor (4) specific parameters that can be used to indicate the electrostatic precipitators' (ESP) performance for the duration of the permit period to provide relevant operational and parameter data. The operational and parameter data collection will be used to develop an appropriate compliance assurance-monitoring plan, if needed, based on the stated permit condition, above. The permittee shall monitor the primary and secondary voltage, primary and secondary current, sparking rate, and number of fields on line at least once each week when the unit is on line.

The installation makes a commitment to take timely corrective action during periods of excursions where the indicators of the electrostatic precipitator performance are out of range. A corrective action may include an investigation of the reason for the excursion, evaluation of the situation and necessary follow-up action to return the operation within the indicator range. An excursion can be determined by the average discrete data point over a period of time, or the presence of a monitored abnormal condition. ESP parameters alone are not prima facie evidence of a violation but may be used with other information to establish a violation of a particulate matter limitation.

Opacity monitoring will be continuous and used as an indicator of the proper operation of the electrostatic precipitators. Corrective action measures will be implemented when the opacity exceeds 40% percent for more than one (1) six (6) minute average. A corrective action may include an investigation of the reason for the excursion, evaluation of the situation and necessary follow-up action to return the operation within the indicator range.

An audible or visual alarm that indicates precipitator trouble will be monitored.

Inspection of the rapper operation, T-R set operation, inspection of the ash removal system are required to be included in the operation and maintenance plan. Corrective action measures will be implemented when system inspections indicate an abnormal condition. Abnormal conditions will include the following: a T-R set failure, rapper system failure, ash transport system failure. Random T-R system failure and rapper failure (up to 4 T-R sets and 20 percent of the rappers) will not significantly affect precipitator performance.

Each major unit overhaul shall be defined in the maintenance plan to include the inspection of plate electrode alignment, the inspection of the collection surface for fouling, the mechanical condition of the T-R set and the inspection of the internal structural components. Corrective action procedures will be devised and implemented on the occurrence of an abnormal condition(s). The appropriate measures for corrective action(s) will be implemented in a timely manner.

Record Keeping:

The permittee shall maintain a record of the initial stack testing and any other subsequent testing or test information for particulate matter required by this rule.

The permittee shall maintain records of any monitoring or control equipment malfunctions.

All corrective actions records required by this condition shall be maintained.

The permittee shall maintain records of the annual USEPA Method 9 Visual Observation and any other Method 9 test performed in accordance with this permit.

The permittee shall maintain records of all six (6) minute opacity averages. Attachment D or an equivalent record keeping form shall be used to record all opacity exceedances and monitor downtime events that occur when the electrostatic precipitator is required to be in operation. These records are not required to be stored as hardcopies, but may be stored in the permittees computerized emissions system as an electronic record.

These records shall be made available immediately for inspection to the Department of Natural Resource's personnel upon request.

Opacity reports and supporting data shall be maintained at the installation in either hardcopy or electronic format. The permittee shall maintain a written or electronic copy of all inspections and any action resulting from the inspection.

Electrostatic precipitator maintenance and inspection records shall be kept for a period of five (5) years and made available upon request.

Maintain a spare parts inventory by a computerized inventory or other administrator approved management system.

Reporting:

The permittee shall report to the Air Pollution Control Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after any exceedance of 10 CSR 10-5.030 demonstrated by a stack test required by this rule or as requested by the Department of Natural Resources. The installation shall report to the Air Pollution Control Enforcement Section the compliance status concerning the provisions of periodic monitoring in the semiannual and annual reports.

Permit Condition EU0010 and EU0020-02
10 CSR 10-5.090 and 10 CSR 10-6.220
Restriction of Emission of Visible Air Contaminants
<p><i>Emission Limitation:</i> No person may discharge into the ambient air from any single existing source of emission whatsoever, any air contaminant:</p> <ul style="list-style-type: none">• of a shade or density equal to or darker than that designated as No. 1 on the Ringlemann Chart (20% opacity) or• of an opacity as to obscure an observer's view to a degree equal to or greater than does smoke designated as No. 1 on the Ringlemann Chart (20% opacity) or• Exception: A person may discharge into the atmosphere from any single source of emissions for a period(s) aggregating not more than six (6) minutes in any 60 minutes air contaminants of a shade or density not equal to nor darker than No. 2 (40% opacity) on the Ringlemann Chart; or of an opacity as to obscure an observer's view to a degree not equal to nor greater than does smoke designated as No. 2 (40% opacity) on the Ringlemann Chart.
<p><i>Monitoring:</i></p> <ul style="list-style-type: none">• A continuous opacity monitoring system shall be used to determine the opacity of the stack gases generated by the boiler. Sampling frequency shall be in accordance with 40 CFR Part 60.13(e)(1). Results shall be recorded on a Data Acquisition System (DAS)• The permittee shall calibrate, maintain, and operate a continuous opacity monitoring system for measuring opacity. The installation shall conduct a daily calibration check on the monitoring system as outlined by 40 CFR Part 60, Appendix B, Spec. 1.
<p><i>Record Keeping:</i></p> <ul style="list-style-type: none">• The permittee shall record the daily monitoring system calibration check done on the continuous opacity monitoring system. Attachment D or an equivalent record keeping sheet or an electronic record shall be used to record all exceedances of the emission limitation and monitor downtime events.• This installation shall maintain records (the data these records are to contain are defined in the regulations) to include: The permittee shall maintain records of each six (6) minute opacity period. The permittee shall maintain records of any opacity or monitoring equipment malfunctions. The permittee shall maintain records of Method 9 visual observation performed in accordance with this permit condition.• These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.• All records will be maintained for five (5) years.

Reporting:

- The permittee shall report to the Air Pollution Control Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after any exceedance of the opacity limit established by 10 CSR 10-5.090, based on USEPA Method 9 Visual Observation test(s).
- The permittee shall report quarterly when the monitoring system showed exceedances of the opacity limitations set forth in this rule. If any exceedances were recorded, the quarterly report should give the day, the duration of how long the emission unit was out of the limitations set forth in this rule, and a data summary of the exceedance (the data summary shall consist of the magnitude in actual percent opacity of all six (6)-minute averages of opacity greater than the opacity emission limitation). Additionally, the report shall give a detailed explanation of why the plant was in exceedance (nature and cause) and corrective action taken by the permittee to bring the emission unit back into the limitations set forth in this rule. Further, the permittee shall report when the monitoring system is down due to inoperative periods, repairs, malfunctions or monitor adjustments. The report shall give a reason why the monitor was down, the duration of the downtime event, and provide the percent of the total operating period the monitor experienced downtime. The report shall distinguish between those downtime events that were due to Quality Assurance activities and those events that occurred for other reasons. However, if no excess emissions occurred within the quarter and the continuous opacity monitoring system has not been inoperative, repaired, or adjusted, that information shall be included in the report. All quarterly reports shall be postmarked by the 30th day following the end of each calendar quarter.
- **10 CSR10-6.220 is a state-only requirement and has not been approved as part of the federally approved State Implementation Plan (SIP).**

Permit Condition EU0010 and EU0020-03

10 CSR 10-6.260

Restriction of Emission of Sulfur Compounds

Emission Limitation:

INDIRECT HEATING SOURCES

- No person shall cause or allow emissions of sulfur dioxide into the atmosphere from any indirect heating source in excess of 2.3 pounds of sulfur dioxide per million BTUs actual heat input averaged on any consecutive three (3) hour time period.
- 10 CSR 10-6.260 (4) No person shall cause or permit the emission of sulfur compounds from any source which causes or contributes to concentrations exceeding those specified in 10 CSR 10-6.010 Ambient Air Quality Standards.

Monitoring:

- The permittee shall install, maintain, and operate a continuous emission monitoring system for measuring the sulfur dioxide (SO₂) emission rate (#SO₂/mmBtu) in accordance with 40 CFR Part 75 and 40 CFR Part 60, Appendix A, Method 19.
- In addition, the permittee shall comply with the quality assurance requirements in 40 CFR Part 75, Appendix B.
- The permittee shall conduct on the frequency required in Part 75, Appendix B, a Relative Accuracy Test Audit on the continuous emission monitoring system, pursuant to 40 CFR Part 75, in 40CFR Part 60, Appendix A, using Reference Method 6c for SO₂, or equivalent EPA approved method.
- For a complete list of all testing and quality assurance measures required review 40 CFR Part 75 and 40 CFR Part 60.

Record Keeping:

- The permittee shall maintain hourly records of the sulfur dioxide emission rate (#SO₂/mmBtu) in accordance with 40 CFR Part 75 and 40 CFR Part 60, Appendix A, Method 19.

Reporting

- The permittee shall report to the Air Pollution Control Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after any exceedance or non-compliance of 10 CSR 10-6.260 demonstrated by the requirements set forth in this condition.
- The permittee shall report quarterly when the monitoring system showed exceedances of the sulfur dioxide limitations set forth in this rule. If any exceedances were recorded, the quarterly report should give the day, the duration of how long the emission unit was out of the limitations set forth in this rule, and a data summary of the exceedance (the data summary shall consist of the magnitude in actual pounds of sulfur dioxide per million BTU's actual heat input averaged over three consecutive hours). Additionally, the report shall give a detailed explanation of why the plant was in exceedance (nature and cause) and corrective action taken by the permittee to bring the emission unit back into the limitations set forth in this rule. Further, the permittee shall report when the monitoring system is down due to inoperative periods, repairs, malfunctions or monitor adjustments. The report shall give a reason why the monitor was down, the duration of the downtime event, and provide the percent of the total operating period the monitor experienced downtime. The report shall distinguish between those downtime events that were due to Quality Assurance activities and those events that occurred for other reasons. However, if no excess emissions occurred within the quarter and the continuous sulfur dioxide monitoring system has not been inoperative, repaired, or adjusted, that information shall be included in the report. All quarterly reports shall be postmarked by the 30th day following the end of each calendar quarter.

10 CSR 10-6.260(4) is a state-only requirement and has not been approved as part of the federally approved State Implementation Plan (SIP).

EU0030
 Auxiliary Boiler

General Description:	Auxiliary Boiler 135 MMBTU/hr
Manufacturer/Model #:	Combustion Engineering Model 23-A-14
EIQ Reference # (Year):	EP#=B3

Permit Condition EU0030-01

10 CSR 10-5.030

Maximum Allowable Emission of Particulate Matter from Fuel Burning Equipment Used for Indirect Heating

Emission Limitation:

The permittee shall not emit particulate matter in excess of 0.31 pounds per million BTU of heat input.

Monitoring:

The permittee shall monitor the quantity and quality of fuel oil consumed (burned).

Record keeping:

Purchase receipts, analyzed samples or certifications that verify the fuel type as a grade level with a sulfur content less than 0.5% by weight will be acceptable. The fuel oils known to be less than 0.5% by weight sulfur per Chapter 414 RSMo, section 414.032, ASTM D396 – Table 1 and ASTM D975 – Table 1, are fuel oil No. 1 and No. 2 and diesel fuel oil Grade Low Sulfur No. 1-D, Grade Low Sulfur No. 2-D. If this can not be accomplished then compliance to the emission limitations shall be determined by source testing and shall be accomplished as specified in 10 CSR 10-6.030(6). Other methods approved by the staff director in advance may be used.

Reporting:

The permittee shall report to the Air Pollution Control Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after any exceedance of 10 CSR 10-5.030 demonstrated by a stack test required by this rule or as requested by the Department of Natural Resources.

Permit Condition EU0030-02

10 CSR 10-5.090 and 10 CSR 10-6.220

Restriction of Emission of Visible Air Contaminants

Emission Limitation:

No person may discharge into the ambient air from any single existing source of emission whatsoever, any air contaminant:

- of a shade or density equal to or darker than that designated as No. 1 on the Ringlemann Chart (20% opacity); or
- of an opacity as to obscure an observer's view to a degree equal to or greater than does smoke designated as No. 1 on the Ringlemann Chart (20% opacity) or
- Exception: A person may discharge into the atmosphere from any single source of emissions for a period(s) aggregating not more than six (6) minutes in any 60 minutes air contaminants of a shade or density not equal to nor darker than No. 2 (40% opacity) on the Ringlemann Chart; or of an opacity as to obscure an observer's view to a degree not equal to nor greater than does smoke designated as No. 2 (40% opacity) on the Ringlemann Chart.

Monitoring:

- The permittee shall conduct opacity measurements on this emission unit using USEPA Test Method 22. Readings are only required when the emission unit is operating and when the weather conditions allow. If no visible or other significant emissions are observed by a method 22 reading, then no further progressive observations would be required, this inspection. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct a Method 9 observation.
- The following monitoring schedule must be maintained:
 - a) **Frequency of Monitoring:** An operating period shall be defined as continuous operating totaling four (4) or more hours. Weekly observations (once per operating period, but not less than once per week) shall be conducted on this emission point for a minimum of eight consecutive operating periods. Should no violations of this regulation be observed in that time period, then observations shall be conducted every other operating period for a period of eight operating periods (but not less than once every other week). Should no violations be observed in this time period, then periodic observations need be done no more than once every six months. Should violations be observed at any emission point, then:
 - (1) The frequency of periodic monitoring will revert to weekly and would follow the reduction in frequency of monitoring as just outlined, provided no further violations were observed.
 - (2) Union Electric Rush Island Plant will take whatever steps are necessary to bring the installation back in to compliance with this regulation. These measures will be implemented as soon as is practical.
- The permittee shall conduct an annual opacity measurement on the emission unit by USEPA Test Method 9 with a certified Method 9 observer.

Record keeping:

- The permittee shall maintain records of all Method 22 results (see Attachment B) noting:
 - Whether any air emissions (except for water vapor) were visible from the emission units,
 - All emission units from which visible emissions occurred, and
 - Whether the visible emissions were normal for the process.
- The permittee shall maintain records of equipment malfunctions.
- The permittee shall maintain records of the annual USEPA Method 9 opacity test and any other Method 9 test performed in accordance with this permit condition.

Reporting:

The permittee shall report to the Air Pollution Control Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after any exceedance of the opacity limit established by 10 CSR 10-5.090, or equipment malfunction which could possible cause an opacity exceedance.

10 CSR 10-6.220 is a state-only requirement and has not been approved as part of the federally approved State Implementation Plan (SIP).

Permit Condition EU0030-03
10 CSR 10-6.260
Restriction of Emission of Sulfur Compounds
<i>Emission Limitation:</i> INDIRECT HEATING SOURCES <ul style="list-style-type: none">• 10 CSR 10-6.260(4) No person shall cause or permit the emission of sulfur compounds from any source which causes or contributes to concentrations exceeding those specified in 10 CSR 10-6.010 Ambient Air Quality Standards.• During the months of October, November, December, January, February and March of every year, no person shall burn or permit the burning of any coal containing more than two percent (2%) sulfur or of any fuel oil containing more than two percent (2%) sulfur in any installation having a capacity of less than two thousand (2000) million BTU's per hour. Otherwise, no person shall burn or permit the burning of any coal or fuel oil containing more than four percent (4%) sulfur in any installation having a capacity of less than two thousand (2000) million Btu's per hour.• Or, this rule shall not apply to any installation if it can be shown that emissions of sulfur dioxide from the installation into the atmosphere will not exceed two and three-tenths (2.3) pounds per million BTUs of heat input to the installation. No person shall cause or allow emissions of sulfur dioxide into the atmosphere from any indirect heating source in excess of 2.3 pounds of sulfur dioxide per million BTUs actual heat input to the installation.
<i>Monitoring:</i> The installation shall maintain monthly records of the quantity and fuel type used verifying a sulfur content less than or equal to the allowable sulfur limits by weight for the appropriate time periods. Purchase receipts, analyzed samples or certifications that verify the fuel type as a grade level with a sulfur content less than the allowable sulfur limits by weight for the appropriate time periods will be acceptable. If this can not be accomplished then compliance with the emission limitations shall be determined by source testing and shall be accomplished as specified in 10 CSR 10-6.030(6). Other methods approved by the staff director in advance may be used.
<i>Record Keeping:</i> The permittee shall maintain monthly records of the sulfur content of the fuel, the amount of fuel oil burned and the amount of heat input to the boiler.
<i>Reporting:</i> The permittee shall report to the Air Pollution Control Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after any exceedance of 10 CSR 10-6.260 demonstrated by the record keeping provisions of this permit condition. 10 CSR 10-6.260(4) is a state-only requirement and has not been approved as part of the federally approved State Implementation Plan.

EU0060
Emergency Diesel Generator

General Description:	Diesel fueled generator 10.8 MMBTU/HR
Manufacturer/Model #:	General Motors 12-645E1 DOM 10-72
EIQ Reference # (1997):	EP#=B4

Permit Condition EU0060-01
10 CSR 10-6.260
Restriction of Emission of Sulfur Compounds
<p><i>Emission Limitation:</i> DIRECT HEATING</p> <ul style="list-style-type: none"> • Emissions from any new source operation shall not contain more than five hundred parts per million by volume (500 ppmv) of sulfur dioxide, averaged on any consecutive three (3) hour time period. • Emissions from any new source operation shall not contain more than thirty-five milligrams (35 mg) per cubic meter 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(4) No person shall cause or permit the emission of sulfur compounds from any source which causes or contributes to concentrations exceeding those specified in 10 CSR 10-6.010 Ambient Air Quality Standards.
<p><i>Monitoring:</i> The installation shall maintain records of the fuel type used verifying a sulfur content less than 0.5% by weight. Purchase receipts, analyzed samples or certifications that verify the fuel type as a grade level with a sulfur content less than 0.5% by weight will be acceptable. The fuel oils known to be less than 0.5% by weight sulfur per Chapter 414 RSMo, section 414.032, ASTM D396 - Table 1 and ASTM D975 - Table 1, are fuel oil no. 1 and no. 2 and diesel fuel oil Grade Low Sulfur No. 1-D, Grade Low Sulfur No. 2-D. If this can not be accomplished then compliance to the emission limitations shall be determined by source testing and shall be accomplished as specified in 10 CSR 10-6.030(6). Other methods approved by the staff director in advance may be used.</p>
<p><i>Record keeping:</i> The permittee shall maintain an accurate record of the sulfur content of fuel. Purchase receipts, analyzed samples or certifications that verify the fuel type as a grade level with a sulfur content less than 0.5% by weight will be acceptable. These records shall be made available in a timely manner for inspection to the Department of Natural Resources' personnel upon request.</p>
<p><i>Reporting:</i> The permittee shall report to the Air Pollution Control Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after any exceedance of 10 CSR 10-6.260 demonstrated by the appropriate record keeping forms.</p>
<p>10 CSR 10-6.260(4) is a state-only requirement and has not been approved as part of the federally approved State Implementation Plan.</p>

EU0070
12 silos for coal storage

General Description:	12 silos for coal storage
Manufacturer/Model #:	Industrial Clean Air 1A, 1B, 1C, 2A, 2B, and 2C
EIQ Reference # (Year):	Not listed on EIQ

Permit Condition EU0070-01

10 CSR 10-5.090 and 10 CSR 10-6.220

Restriction of Emission of Visible Air Contaminants

Emission Limitation:

No person may discharge into the ambient air from any single existing source of emission whatsoever, any air contaminant:

- of a shade or density equal to or darker than that designated as No. 1 on the Ringlemann Chart (20% opacity); or
- of an opacity as to obscure an observer's view to a degree equal to or greater than does smoke designated as No. 1 on the Ringlemann Chart (20% opacity) or

Exception: A person may discharge into the atmosphere from any single source of emissions for a period(s) aggregating not more than six (6) minutes in any 60 minutes air contaminants of a shade or density not equal to nor darker than No. 2 (40% opacity) on the Ringlemann Chart; or of an opacity as to obscure an observer's view to a degree not equal to nor greater than does smoke designated as No. 2 (40% opacity) on the Ringlemann Chart.

Monitoring:

- The permittee shall conduct opacity readings on this emission unit using the procedures contained in USEPA Test Method 22. Readings are only required when the emission unit is operating and when the weather conditions allow. If no visible or other significant emissions are observed, then no further progressive observations would be required, this inspection. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct a Method 9 observation.
 - The following monitoring schedule must be maintained:
 1. Weekly observations shall be conducted for a minimum of eight (8) consecutive weeks after permit issuance. Should no violation of this regulation be observed during this period then-
 2. Observations must be made once every two weeks for a period of eight (8) weeks. If a violation is noted, monitoring reverts to weekly. Should no violation of this regulation be observed during this period then-
 3. Observations must be made once per month. If a violation is noted, monitoring reverts to weekly.
 - If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.
- I) The permittee shall conduct an annual opacity measurement on the emission unit by USEPA Test Method 9 with a certified Method 9 observer.

Record keeping:

- The permittee shall maintain records of all Method 22 results (see Attachment B) noting:
Whether any air emissions (except for water vapor) were visible from the emission units,
All emission units from which visible emissions occurred, and
Whether the visible emissions were normal for the process.
- The permittee shall maintain records of equipment malfunctions.
- The permittee shall maintain records of the annual USEPA Method 9 opacity test and any other Method 9 test performed in accordance with this permit condition.

Reporting:

The permittee shall report to the Air Pollution Control Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after any exceedance of the opacity limit established by 10 CSR 10-5.090, or any malfunction which could possible cause an opacity exceedance.

10 CSR 10-6.220 is a state-only requirement and has not been approved as part of the federally approved State Implementation Plan (SIP).

EU0080
Cold Solvent Cleaner

General Description:	Parts Washer
Manufacturer/Model #:	(may vary with suppliers)
EIQ Reference # (1997):	EP#-P1

Permit Condition EU0080-01
10 CSR 10-5.300
Control of Emissions From Solvent Metal Cleaning

Emission Limitation:

The permittee shall not cause or allow solvent metal cleaning or degreasing operations:

- Without adhering to operating procedures (10-5.300(5)) for cold cleaners as contained in the regulation and to recommendations by the equipment manufacturer;
- Without the minimum operator and supervisor training as specified in this regulation (10-5.300(6));
- Unless the equipment conforms to the specifications listed in this regulation for cold cleaners(10-5.300(4)(A)).

Operating Procedures for Cold Cleaners:

- Cold cleaner covers shall be closed whenever parts are not being handled in the cleaners or the solvent must drain into an enclosed reservoir.
- Cleaned parts shall be drained in the freeboard area for at least fifteen (15) seconds or until dripping ceases, whichever is longer.
- Whenever a cold cleaner fails to perform within the operating parameters established for it by this rule, the unit shall be shut down immediately and secured. It shall remain shut down until trained service personnel are able to restore operation within the established parameters.
- Solvent leaks shall be repaired immediately or the degreaser will be shut down and the leaks secured until they can be more permanently repaired.
- Any waste material removed from a cold cleaner shall be disposed of by one (1) of the following methods or equivalent (after the director's approval) and in accordance with 10 CSR 25, as applicable:
 1. Reduction of the waste material to less than twenty percent (20%) VOC solvent by distillation and disposal of the still bottom waste; or
 2. Storage in closed containers for transfer to a contract reclamation service; or
 3. Storage in closed containers for transfer to a disposal facility approved by the director.
- Waste solvent shall be stored in closed containers only.

Operator and Supervisor Training:

- Only persons trained in at least the operational and equipment requirements specified in this rule for their particular solvent metal cleaning process shall be permitted to operate the equipment.
- The supervisor of any person who operates a solvent metal cleaning process shall receive equal or greater operational training than the operator.
- Refresher training shall be given to all solvent metal cleaning equipment operators at least once each 12 months.

Equipment Specifications for Cold Cleaners after September 30, 1998:

- No owner or operator shall allow the operation of any cold cleaner using a cold cleaning solvent with a vapor pressure greater than 2.0 millimeter of Mercury (mmHg) (0.038 pounds per square inch (psi) at 20°C, 68°F).

Equipment Specifications for Cold Cleaners after April 1, 2001:

- No owner or operator shall operate or allow the operation of any cold cleaner using a cold cleaning solvent with a vapor pressure greater than 1.0 mmHg (0.019 psi) at 20°C (68°F).

Monitoring:

- The permittee shall monitor the quantities of the cleaning solvents purchased and consumed.
- The permittee shall maintain material safety data sheets of the cleaning solvents used.
- The permittee shall monitor the disposal operations of the solvent containing waste material.
- The permittee shall monitor maintenance activities performed on the cold cleaner.
- The permittee shall monitor the solvent metal cleaning training for the employees.

Record Keeping:

- The permittee shall maintain records which include for each purchase of cold cleaning solvent (Attachment H):
 1. The name and address of the solvent supplier;
 2. The date of purchase;
 3. The type of solvent; and
 4. The vapor pressure of the solvent in mm Hg at 20°C (68°F).
- The permittee of a solvent metal cleaning or degreasing operation shall keep monthly inventory records of solvent types and amounts purchased and solvent consumption (Attachment I) for a period of five (5) years.
- The permittee shall keep records of all types and amounts of solvent containing waste material transferred (Attachment J) to either a contract reclamation service or to a disposal facility and all amounts distilled on the premises.
- The permittee shall keep maintenance repair logs (Attachment K).
- A record shall be kept of solvent metal cleaning training for each employee (Attachment L).
- All records shall be maintained for five (5) years and shall be made available to the Director upon request.
- Attachments H, I, J, K, and L contain logs including these record keeping requirements. This log, or an equivalent created by the permittee, must be used to certify compliance with these requirements

Reporting:

The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than 10 days after any exceedance of 10 CSR 10-5.300 demonstrated by the appropriate record keeping forms.

IV. Core Permit Requirements

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.
Core Permit Requirements

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

The permittee shall submit the following information to the director not later than 15 days after receipt of the notice of excess emissions:

- a) Name and location of installation;
- b) Name and telephone number of person responsible for the installation;
- c) The identity of the equipment causing the excess emissions;
- d) The time and duration of the period of excess emissions;
- e) The cause of the excess emissions;
- f) The type of air contaminant involved;
- g) A best estimate of the magnitude of the excess emissions expressed in the units of the applicable emission control regulation and the operating data and calculations used in estimating the magnitude;
- h) The measures taken to mitigate the extent and duration of the excess emissions; and
- i) The measures taken to remedy the situation which caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations.

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 (5) years without first obtaining a permit from the permitting authority.

10 CSR 10-6.065, Operating Permits

The permittee shall file for renewal of this operating permit no sooner than 18 months, nor later than six (6) months, prior to the expiration date of this operating permit. The permittee shall retain the most current operating permit issued to this installation on-site and shall immediately make such permit available to any Missouri Department of Natural Resources personnel upon request.

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

The permittee shall complete and submit an Emission Inventory Questionnaire (EIQ) in accordance with the requirements outlined in this rule.

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/red), watch or emergency and the associated procedures and emissions 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 10-6.180, Measurement of Emissions of Air Contaminants

- (a) 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.
- (b) 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.
- (c) The director shall be given a copy of the test results in writing and signed by the person responsible for the tests.

10 CSR 10-5.070, Open Burning Restrictions

- (a) The permittee shall not conduct, cause, permit or allow a salvage operation, the disposal of trade wastes or burning of refuse by open burning.
- (b) Exception - Open burning of trade waste or vegetation may be permitted only when it can be shown that open burning is the only feasible method of disposal or an emergency exists which requires open burning. However, weed control for control conservation burning is permitted. This rule shall not apply to fires set for the purpose of training fire fighters and industrial employees in fire fighting methods in accordance with 10 CSR 10-3.030(4)(c) 4., except as noted in 10 CSR 10-3.030(D).
- (c) Any person intending to engage in open burning shall file a request to do so with the director. The request shall include the following:
 - 1) The name, address and telephone number of the person submitting the application; The type of business or activity involved; A description of the proposed equipment and operating practices, the type, quantity and composition of trade wastes and expected composition and amount of air contaminants to be released to the atmosphere where known;

- 2) The schedule of burning operations;
 - 3) The exact location where open burning will be used to dispose of the trade wastes;
 - 4) Reasons why no method other than open burning is feasible; and
 - 5) Evidence that the proposed open burning has been approved by the fire control authority, which has jurisdiction.
- (d) Upon approval of the open burning permit application by the director, the person may proceed with the operation under the terms of the open burning permit. Be aware that such approval shall not exempt Union Electric Rush Island Plant from the provisions of any other law, ordinance or regulation.
- (e) The permittee shall maintain files with letters from the director approving the open burning operation and previous DNR inspection reports.

10 CSR 10-5.160, Restriction of Emission of Odors

No person shall emit odorous matter as to cause an objectionable odor on or adjacent to:

- (a) Residential, recreational, institutional, retail sales, hotel or educational premises.
- (b) Industrial premises when air containing odorous matter is diluted with 20 or more volumes of odor-free air; or
- (c) Premises other than those in paragraphs (1)A.1. and (2) of the rule when air containing odorous matter is diluted with four (4) or more volumes of odor-free air.

The previously mentioned requirement shall apply only to objectionable odors. An odor will be deemed objectionable when 30% or more of a sample of the people exposed to it believe it to be objectionable in usual places of occupancy; the sample size to be at least 20 people or 75% of those exposed if fewer than 20 people are exposed.

This requirement is not federally enforceable.

10 CSR 10-6.100, Alternate Emission Limits

Proposals for alternate emission limitations shall be submitted on Alternate Emission Limits Permit forms provided by the department. An installation owner or operator must obtain an Alternate Emission Limits Permit in accordance with 10 CSR 10-6.100 before alternate emission limits may become effective.

V. General Permit Requirements

Permit Duration

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

This permit is issued for a term of five (5) years, commencing on the date of issuance. This permit will expire at the end of this period unless renewed.

General Record Keeping and Reporting Requirements

10 CSR 10-6.065(6)(C)1.C

I) Record Keeping

- A) All required monitoring data and support information shall be retained for a period of at least five (5) 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.

II) Reporting

- A) The permittee shall submit a report of all required monitoring by:
 - 1) October 1st for monitoring which covers the January through June time period, and
 - 2) April 1st for monitoring which covers the July through December time period.
 - 3) Exception: Monitoring requirements which require reporting more frequently than semi annually shall report no later than 30 days after the end of the calendar quarter in which the measurements were taken.
- B) Each report must identify any deviations from emission limitations, monitoring, record keeping, reporting, or any other requirements of the permit.
- C) All reports shall be submitted to the Air Pollution Control Program, Operating Permit Unit, P.O. Box 176, Jefferson City, MO 65102.
- D) Submit supplemental reports as required or as needed. Supplemental reports are required no later than ten (10) days after any exceedance of any applicable rule, regulation or other restriction. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
 - 1) Notice of any deviation resulting from an emergency (or upset) condition as defined in paragraph (6)(C)7 of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two (2) working days after the date on which the emission limitation is exceeded due to the emergency, if you wish 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 that you 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.
- 2) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.
 - 3) 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 the 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 (10) days after the deviation, the report may be submitted without a certification if the report is resubmitted with an appropriate certification within ten (10) 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.
- G) These supplemental reports shall be submitted to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 no later than ten (10) days after any exceedance of any applicable rule, regulation, or other restriction.

Risk Management Plans Under Section 112(r)

10 CSR 10-6.065(6)(C)1.D.

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

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

Severability Clause

10 CSR 10-6.065(6)(C)1.F.

In the event of a successful challenge to any part of this permit, all uncontested permit conditions shall continue to be in force.

General Requirements

10 CSR 10-6.065(6)(C)1.G

- 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 re-issuance, or termination, or the filing of a notification of planned changes or anticipated noncompliance, will not stay any permit condition.

- 4) This permit does not convey any property rights of any sort, nor grant any exclusive privilege.
- 5) The permittee shall furnish to the Air Pollution Control Program, upon receipt of a written request and within a reasonable time, any information that the Air Pollution Control Program reasonably may require to determine whether cause exists for modifying, reopening, reissuing or revoking the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the Air Pollution Control Program copies of records required to be kept by the permittee. The permittee may make a claim of confidentiality for any information or records submitted pursuant to 10 CSR 10-6.065(6)(C)1.

Incentive Programs Not Requiring Permit Revisions

10 CSR 10-6.065(6)(C)1.H.

No permit revision will be required for any installation changes made under any approved economic incentive, marketable permit, emissions trading, or other similar programs or processes provided for in this permit.

Reasonably Anticipated Operating Scenarios

10 CSR 10-6.065(6)(C)1.I.

Title IV Allowances

This permit shall prohibit emissions which exceed any allowances the installation holds under Title IV of the Act.

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

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

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

Phase I permit was issued for period of January 01, 1995 to December 31, 1999

Compliance Requirements

10 CSR 10-6.065(6)(C)3.

- I) Any document (including reports) required to be submitted under this permit shall contain a certification signed by the responsible official.
- II) 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.
- III) 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.
- IV) 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 unless the applicable requirement specifies more frequent submission. 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.

Permit Shield

10 CSR 10-6.065(6)(C)6.

- I) Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements as of the date that this permit is issued, provided that:
 - A) The applicable requirements are included and specifically identified in this permit; or
 - B) The permitting authority, in acting on the permit revision or permit application, determines in writing that other requirements, as specifically identified in the permit, are not applicable to the installation, and this permit expressly includes that determination or a concise summary of it.
- II) Be aware that there are exceptions to this permit protection. The permit shield does not affect the following:

- A) The provisions of section 303 of the Act or section 643.090, RSMo concerning emergency orders,
- B) Liability for any violation of an applicable requirement which occurred prior to, or was existing at, the time of permit issuance,
- C) The applicable requirements of the acid rain program,
- D) The administrator's authority to obtain information, or
- E) Any other permit or extra-permit provisions, terms or conditions expressly excluded from the permit shield provisions.

Emergency Provisions

10 CSR 10-6.065(6)(C)7.

- I) An emergency or upset as defined in 10 CSR 10-6.065(6)(C)7. 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, you must demonstrate, through properly signed, contemporaneous operating logs or other relevant evidence, the following:
 - A) That an emergency or upset occurred and that you can identify the source of the emergency or upset,
 - B) That the installation was being operated properly,
 - C) That you took all reasonable steps to minimize emissions that exceeded technology-based emissions limitations or requirements in this permit, and
 - D) That you submitted notice of the emergency to the Air Pollution Control Program within two (2) 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.
- II) 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.

Operational Flexibility

10 CSR 10-6.065(6)(C)8.

An installation that has been issued a Part 70 operating permit is not required to apply for or obtain a permit revision in order to make any of the changes to the permitted installation described below if the changes are not Title I modifications, the changes do not cause emissions to exceed emissions allowable under the permit, and the changes do not result in the emission of any air contaminant not previously emitted. The permittee shall notify the Air Pollution Control Program and the Administrator at least seven (7) days in advance of these changes, except as allowed for emergency or upset conditions. Emissions allowable under the permit means a federally enforceable permit term or condition determined at issuance to be required by an applicable requirement that established an emissions limit (including a work practice standard) or a federally enforceable emissions cap that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject.

- I) Section 502(b)(10) changes. Changes that, under section 502(b)(10) of the Act, contravene an express permit term may be made without a permit revision, except for changes that would violate applicable requirements of the Act or contravene federally

enforceable monitoring (including test methods), record keeping, reporting or compliance requirements of the permit.

- A) Before making a change under this provision, The permittee shall provide advance written notice to the Air Pollution Control Program and to the Administrator, describing the changes to be made, the date on which the change will occur, and any changes in emission and any permit terms and conditions that are affected. The permittee shall maintain a copy of the notice with the permit, and this agency shall place a copy with the permit in the public file. Written notice shall be provided to the administrator and this agency at least seven (7) days before the change is to be made. If less than seven (7) days notice is provided because of a need to respond more quickly to these unanticipated conditions, The permittee shall provide notice to the administrator and the permitting authority as soon as possible after learning of the need to make the change.
- B) The permit shield shall not apply to these changes.

Off-Permit Changes

10 CSR 10-6.065(6)(C)9.

- I) Except as noted below, The permittee may make any change in its permitted operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Insignificant activities listed in the application, but not otherwise addressed in or prohibited by this permit, shall not be considered to be constrained by this permit for purposes of the off-permit provisions of this section. Off-permit changes shall be subject to the following requirements and restrictions:
 - A) The change must meet all applicable requirements of the Act and may not violate any existing permit term or condition; The permittee may not change a permitted installation without a permit revision, if this change is subject to any requirements under Title IV of the Act or is a Title I modification;
 - B) The permittee must provide written notice of the change to the permitting authority and to the administrator no later than the next annual emissions report. This notice shall not be required for changes that are insignificant activities under paragraph (6)(B)3. of this rule. This written notice shall describe each change, including the date, any change in emissions, pollutants emitted and any applicable requirement that would apply as a result of the change.
 - C) The permittee shall keep a record describing all changes made at the installation that result in emissions of a regulated air pollutant subject to an applicable requirement and the emissions resulting from these changes; and
 - D) The permit shield shall not apply to these changes.

Responsible Official

10 CSR 10-6.020(2)(R)12.

The application utilized in the preparation of this was signed by Andrew P. Neuhalfen Rush Island Plant-Manager. In addition, at the request of the permittee, the following persons have authority to act as responsible official: Mr. Charles D. Naslund AmerenUE Vice President – Power Plants; Mr. Paul A. Agathen Ameren Services Senior Vice President and Designated Representative; Mr. Thomas Siedhoff Ameren Services Manager - Environmental, Safety and Health and Alternate Designated Representative. 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.

Statement of Basis

10 CSR 10-6.065(6)(E)1.C.

This permit is accompanied by a statement setting forth the legal and factual basis for the draft 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.

Attachment A

Fugitive Emission Observations

Date	Time	Visible Emissions				Abnormal Emission		Initial
		Beyond Boundary	Less than	Normal	Greater than Normal	Cause	Corrective Action	

Attachment B

Method 22 (Outdoor) Observation Log

Responsible Facility
Operator: _____

Date: _____

Sky Conditions: _____
Precipitation: _____

Wind Direction: _____
Wind Speed: _____

Process Unit: _____

Sketch process unit: indicate observer position relative to source and sun; indicate potential emission points and/or actual emission points.

OBSERVATIONS

	Clock Time	Observation Period Duration, min:sec	Accumulated Emission Time, min:sec
Begin Observation	_____	_____	_____
	_____	_____	_____
	_____	_____	_____
	_____	_____	_____
	_____	_____	_____
	_____	_____	_____
	_____	_____	_____
	_____	_____	_____
	_____	_____	_____
	_____	_____	_____
	_____	_____	_____
	_____	_____	_____
	_____	_____	_____
	_____	_____	_____
	_____	_____	_____
	_____	_____	_____
	_____	_____	_____

Attachment D

OPACITY SUMMARY REPORT

PART I. INSTALLATION INFORMATION

Name of Company: Union Electric-
 Address: Rush Island Plant
 Report Period:
 Cer./CEA: (date) (Hr)
 Emission Limit:

Manufacturer/Model Number
 Stack/Process
 Emission Point:
 Pollutant Monitored:

CDs CNTY & SOURCE #'s:

 Total Source Operating Time in Report Period: (Min)

PART II. CAUSE OF EXCESS EMISSIONS (EE)	Duration of EE (Min)	Percent of Operating Time
A. Air Pollution Control Equipment Failure (01)		
B. Fuel Problem (02)		
C. Process Problem (03)		
D. Unknown Cause (Excess Emission) (04)		
E. Startup (05)		
F. Soot Blowing (06)		
G. Other Known Causes (Excess Emission) (07)		
H. Shutdown (08)		
I. Total (A + B + ...E)		
Part III CAUSES OF CEMS DOWNTIME	Downtime (Min)	Percent of Operating Time
A. Monitor Equipment Malfunction (01)		
B. Non-monitor Equipment Malfunction (02)		
C. Quality Assurance (03)		
D. Unknown Cause (Monitor Malfunction) (04)		
E. Other Known Causes (Monitor Malfunction) (05)		
F. Total (A + B + ...E)		

Note: Percent Operating Time = [(EE (min) or Downtime (min)) / Total Operating Time] x 100

EXCESS EMISSION SUMMARY - VISIBLE EMISSIONS

Source: Union Electric-Rush Island Plant
to ___/___/___

Report Period: ___/___/___

Source of Emissions: _____

<u>Date</u>	<u>Time</u>	<u>Magnitude</u>	<u>Reason Message</u>
-------------	-------------	------------------	-----------------------

EXCESS EMISSION SUMMARY - OPAC MONITORING SYSTEM DOWNTIME

Source: Union Electric-Rush Island Plant
to ___/___/___

Report Period: ___/___/___

Source of Emissions: _____

<u>Date</u>	<u>Time</u>	<u>Duration (D-H-M)</u>	<u>Reason Message</u>
-------------	-------------	-------------------------	-----------------------

Attachment E

SO₂ EMISSION SUMMARY REPORT

PART I. INSTALLATION INFORMATION

Name of Company: Union Electric-
 Address: Rush Island Plant

Report Period:
 Cer./CEA: (date) (Hr)
 Emission Limit:

Manufacturer/Model Number
 Stack/Process

Emission Point:
 Pollutant Monitored: SO₂ #RAVG

CDs CNTY & SOURCE #'s:

Total Source Operating Time in Report Period: _____ (hrs)

PART II. CAUSE OF EXCESS EMISSIONS (EE)	Duration of EE (Hrs)	Percent of Operating Time
A. Air Pollution Control Equipment Failure (01)		
B. Fuel Problem (02)		
C. Process Problem (03)		
D. Unknown Cause (Excess Emission) (04)		
E. Startup (05)		
F. Soot Blowing (06)		
G. Other Known Causes (Excess Emission) (07)		
H. Shutdown (08)		
I. Total (A + B + ...E)		
Part III CAUSES OF CEMS DOWNTIME	Downtime (Hrs)	Percent of Operating Time
A. Monitor Equipment Malfunction (01)		
B. Non-monitor Equipment Malfunction (02)		
C. Quality Assurance (03)		
D. Unknown Cause (Monitor Malfunction) (04)		
E. Other Known Causes (Monitor Malfunction) (05)		
F. Total (A + B + ...E)		

Note: Percent Operating Time = [(EE (hrs) or Downtime (hrs) / Total Operating Time] x 100

EXCESS SO₂ #RAVG EMISSION REPORT

Source: Union Electric-Rush Island Plant

Quarter: _____ Year: _____

Source of Emissions: _____

The following information is reported in total time for the entire quarter identified above.

Excess Emission Duration _____ (hours)

If duration is other than zero, submit SO₂ #RAVG emission form.

Monitoring System Downtime Due to Quality Assurance _____ (hours)

If downtime, not including zero and span calibrations, is other than zero, submit downtime system Downtime form.

Monitoring System Downtime Excluding Downtime Due to Quality Assurance _____ (hours)

Source Operating Time _____ (hours)

Reported by _____

Position Title _____

EXCESS EMISSION SUMMARY - SO₂ #RAVG

Source: Union Electric-Rush Island Plant
to ___/___/___

Report Period: ___/___/___

Source of Emissions: _____

<u>Date</u>	<u>Time</u>	<u>Magnitude</u>	<u>Reason Message</u>
-------------	-------------	------------------	-----------------------

EXCESS EMISSION SUMMARY - SO₂ #RAVG MONITORING SYSTEM DOWNTIME

Source: Union Electric-Rush Island Plant
to ___/___/___

Report Period: ___/___/___

Source of Emissions: _____

<u>Date</u>	<u>Time</u>	<u>Duration (hr)</u>	<u>Reason Message</u>
-------------	-------------	-----------------------	-----------------------

Attachment F

NOx EMISSION SUMMARY REPORT

PART I. INSTALATION INFORMATION

Name of Company: Union Electric-
 Address: Rush Island Plant

Report Period:
 Cer./CEA: (date) (Hr)
 Emission Limit:

Manufacturer/Model Number
 Stack/Process

Emission Point:
 Pollutant Monitored: NO_x #RAVG

CDs CNTY & SOURCE #'s:

Total Source Operating Time in Report Period: _____ (hrs)

PART II. CAUSE OF EXCESS EMISSIONS (EE)	Duration of EE (Hrs)	Percent of Operating Time
A. Air Pollution Control Equipment Failure (01)		
B. Fuel Problem (02)		
C. Process Problem (03)		
D. Unknown Cause (Excess Emission) (04)		
E. Startup (05)		
F. Soot Blowing (06)		
G. Other Known Causes (Excess Emission) (07)		
H. Shutdown (08)		
I. Total (A + B + ...E)		
Part III CAUSES OF CEMS DOWNTIME	Downtime (Hrs)	Percent of Operating Time
A. Monitor Equipment Malfunction (01)		
B. Non-monitor Equipment Malfunction (02)		
C. Quality Assurance (03)		
D. Unknown Cause (Monitor Malfunction) (04)		
E. Other Known Causes (Monitor Malfunction) (05)		
F. Total (A + B + ...E)		

Note: Percent Operating Time = [(EE (hrs) or Downtime (hrs)) / Total Operating Time] x 100

EXCESS NO_x #RAVG EMISSION REPORT

Source: Union Electric-Rush Island Plant
Quarter: _____ Year: _____

Source of Emissions: _____

The following information is reported in total time for the entire quarter identified above.

Excess Emission Duration _____ (hours)

If duration is other than zero, submit NO_x #RAVG emission form.

Monitoring System Downtime Due to Quality Assurance _____ (hours)

If downtime, not including zero and span calibrations, is other than zero, submit downtime system Downtime form.

Monitoring System Downtime Excluding Downtime Due to Quality Assurance _____ (hours)

Source Operating Time _____ (hours)

Reported by _____

Position Title _____

EXCESS EMISSION SUMMARY - NO_x #RAVG

Source: Union Electric-Rush Island Plant
to ___/___/___

Report Period: ___/___/___

Source of Emissions: _____

<u>Date</u>	<u>Time</u>	<u>Magnitude</u>	<u>Reason Message</u>
-------------	-------------	------------------	-----------------------

EXCESS EMISSION SUMMARY - NO_x #RAVG MONITORING SYSTEM DOWNTIME

Source: Union Electric-Rush Island Plant
____/____/____

Report Period: ____/____/____ to

Source of Emissions: _____

<u>Date</u>	<u>Time</u>	<u>Duration (hr)</u>	<u>Reason Message</u>
-------------	-------------	----------------------	-----------------------

STATEMENT OF BASIS

Permit Reference Documents

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

- 1) Part 70 Operating Permit Application, received May 14, 1997;
- 2) 1997 Emissions Inventory Questionnaire, received April 06, 1998;
- 3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition.

Applicable Requirements Included in the Operating Permit but Not in the Application

None.

Other Air Regulations Determined Not to Apply to the Operating Permit

The Air Pollution Control Program (APCP) has determined the following requirements to not be applicable to this installation at this time for the reasons stated.

In the application the rule 10 CSR 10-6.260 5(c)2 is assigned as applicable to the Emission Point B-4. B4 is an emergency diesel generator. Diesel engines are not considered to be indirect heating units. The direct heat aspects of rule 10 CSR 10-6.260 is applicable to the unit, but not the indirect aspects of the rule as defined in the permit application.

Construction Permit Revisions

None

NSPS Applicability

Equipment permits were obtained prior to applicability date.

MACT Applicability

Equipment permits were obtained prior to applicability date.

NESHAP Applicability

Equipment permits were obtained prior to applicability date.

Other Regulatory Determinations

County Records and other materials: At various times during the course of the year, Jefferson County requests that the plant destroy county records. These records are burned in one of the boilers as a public service to the community. Approximately two truckloads of records are destroyed each year. In addition, if requested, the plant would be willing to destroy materials for the Jefferson County Sheriff's Department under their direct supervision. No additional monitoring, record keeping or reporting is required for the installation when it is participating in the disposal of county records or destroying materials for local authorities.

The company contact Mr. Steve Hughes explained that the fly ash removal and storage is achieved by a hydra vacuum and then sluiced to the ash pond. The verbal description of this process would allow for consideration of this emission sources as a fugitive emission source and not a defined emission point. In addition, the conveyor belts at this installation do not meet the definition of an emission point for the purpose of this permit. The belt surface is simply covered and not enclosed while a defined stack or exit does not exist. The belts are considered to be fugitive sources for the purposes of this permit.

The permittee must be able to provide information to an inspector on-site; either in hard copy or from the source's computerized emissions records of each 6-minute opacity reading. The use of attachment D is not required or mandatory it is included as an equivalent record keeping form and as an example. Maintaining hardcopy or keeping hardcopy records of every 6 - minute opacity reading is not required. The Attachment D is an example of the information that should be found on similar documents submitted to the MODNR.

Boiler Cleaning Wastes

At various times the coal fired boilers are cleaned with an organic acid (EDTA or HYFOR). Boiler cleaning wastes are then burned in a boiler at or near full load resulting in negligible emissions.

Feedwater Heater Cleaning Wastes

At various times the feedwater heaters are cleaned with an oxidizing agent (Ammonium Persulfate). The feedwater heater cleaning wastes are then burned in a boiler at or near full load resulting in negligible emissions.

Cold Cleaner

The cold cleaners (Parts Washers) are contracted to a third party at the Rush Island Plant. The third party vendor (supplier) may from time to time change and the equipment size and type may vary from one supplier to the next, but it is the responsibility of the permittee to maintain all records, reporting, ensure proper maintenance, training and compliance status of the cold cleaners as stated in the applicable regulations.

March 01, 1996 Letter from Steve Feeler, Chief of Enforcement Air Pollution Control Program to Mr. Michael L. Menne, Supervisor, Environmental Services Union Electric Company outlines the proposed emission limit of 2.3 pounds per million BTU on a 3 hour basis. The points concerning compliance incorporate the following parameters:

- 1) Unintentional blending of residual high sulfur coal or other unusual circumstances might result in exceedences. Such an exceedence would have to be reported, but enforcement discretion would be applied in evaluating accompanying explanations of the incident. If the exceedence were determined to be accidental or unavoidable further enforcement action would not be taken. Frequent repetition of similar incidents would not, however, be dealt with so leniently.
- 2) A) Compliance would be based on actual unadjusted CEMS data.
 - 1) Artificially high SO₂ emission rate values could occur during start-up owing to inclusions of low CO₂ levels in the lb/mmBtu calculation.
 - 2) Because no missing data substitution or bias adjustment requirements appear in the 40 CFR Part 60 regulations which form the basis for state excess

emission reporting requirements, such adjustments could not be required. However, no such limitation exists with respect to emission inventory data and bias adjustment has been required for sources calculating emission fees based on CEMS data which was biased low.

B) Such an apparent exceedence would have to be reported and appropriately explained, but would not be subject to enforcement under 10 CSR10-6.050 which exempts violations during start-up, shut-down and malfunction periods.

3) Twenty-four hours or more might be required to restore compliance after accidental firing of high sulfur coal began. One to twenty-four 3-hour periods on three days per month at less than or equal to 120% of the standard would be permitted.

Compliance is determined on the basis of 3-hour rolling averages. In any twenty-four hour day there are only 22 3-hour rolling averages, not twenty-four, because the last two would have occurred on the following day. Strict interpretation of the regulation would allow a maximum of 72 hours at > 100% but less than or equal to 120 percent of the standard in any month. A three hour period at >100% and less than or equal to 120% of the standard beginning in the 71st or 72nd hour would be a violation.



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

Prepared by:


Timothy Paul Hines
Environmental Engineer


Approved by:


Jonathan Fitch, P.E.
Chief, Operating Permits Unit