



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

# DEPARTMENT OF NATURAL RESOURCES

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**DEC 03 2014**

Mr. Dave Caughey  
 Environmental Manager  
 US DOE - NNSA - National Security Campus KCP  
 14520 Botts Road  
 Kansas City, MO 64147

RE: New Source Review Permit Amendment - Permit Number: 032014-010A  
 Project Number: 2014-05-085; Installation Number: 095-2442

Dear Mr. Caughey:

This amendment addresses changes to the cooling tower potential emissions at CenterPoint Properties Trust, ID 095-2450, permit 1228B. The revised calculation method results in decreased potential PM<sub>2.5</sub> emissions but increased PM<sub>10</sub> emissions. The installation-wide de minimis PM<sub>2.5</sub> limit has been replaced with an installation-wide de minimis PM<sub>10</sub> limit. Potential emissions of PM<sub>2.5</sub> remain below the de minimis level. As the installation-wide potential emissions result from CenterPoint and NNSA, the new limit was portioned between the two entities. A summary of the potential emissions is provided in Table 1.

Table 1: Emission Summary (tpy)

Pollutant	De Minimus Level	NNSA Actual Emissions (2013 EIQ)	NNSA Conditioned Potential Emissions	Combined Installation Conditioned Potential Emissions
PM	25.0	N/D	N/A	17.17
PM <sub>10</sub>	15.0	0	< 5.0	< 15.0
PM <sub>2.5</sub>	10.0	0	N/A	9.69
SO <sub>x</sub>	40.0	0	N/A	0.76
NO <sub>x</sub>	40.0	0	< 1.0	< 40.0
VOC	40.0	1.10	< 39.0	< 40.0
CO	100.0	0	N/A	25.78
CO <sub>2</sub>	N/A	N/A	N/A	N/A
CH <sub>4</sub>	N/A	N/A	N/A	N/A
N <sub>2</sub> O	N/A	N/A	N/A	N/A
GHG (mass)	0 / 100.0 / 250.0	N/A	N/A	45,303.96
GHG (CO <sub>2</sub> e)	75,000 / 100,000	N/A	N/A	46,886.22
Combined HAPs	25.0	0.43	†	< 25.0
Individual HAP	10.0	N/D	†	< SMAL

N/A = not applicable; N/D = not determined

† CenterPoint and NNSA shall share the installation-wide individual HAP SMAL limit and combined HAP 25.0 tpy limit

Mr. Caughey  
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Submittal of an application to amend your basic operating permit is required within 30 days of this amendment's issuance. If you have any questions regarding this amendment, please do not hesitate to contact David Little, at the department's Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102 or at (573) 751-4817. Thank you for your attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM



Kendall B. Hale  
Permits Section Chief

KBH:dll

Enclosures

c: Kansas City Regional Office  
PAMS File: 2014-05-085

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Permit No.	032014-010A
Project No.	2014-05-085

**SPECIAL CONDITIONS:**

The permittee is authorized to construct and operate subject to the following special conditions:

*The special conditions listed in this permit were included based on the authority granted the Missouri Air Pollution Control Program by the Missouri Air Conservation Law (specifically 643.075) and by the Missouri Rules listed in Title 10, Division 10 of the Code of State Regulations (specifically 10 CSR 10-6.060). For specific details regarding conditions, see 10 CSR 10-6.060 paragraph (12)(A)10. "Conditions required by permitting authority."*

US DOE - NNSA - National Security Campus KCP  
Jackson County, S27, T47N, R33W

1. **Superseding Condition**  
The conditions of this permit supersede Special Condition 2 in the previously issued construction permit 032014-010 issued by the Air Pollution Control Program.
2. **PM<sub>10</sub> Emission Limitation**
  - A. NNSA shall emit less than 5.0 tons of PM<sub>10</sub> in any consecutive 12-month period from all emission units at facility ID 095-2442.
  - B. NNSA shall develop and use forms to demonstrate compliance with Special Condition 2.A. The forms shall contain at a minimum the following information,
    - 1) Installation name
    - 2) Installation ID
    - 3) Permit number
    - 4) Current month
    - 5) Current 12-month date range
    - 6) Emission units
    - 7) Emission unit respective current monthly throughput
    - 8) Emission unit respective emission factors, and source
    - 9) Total PM<sub>10</sub> emissions for the reporting date range
    - 10) 12-month rolling total PM<sub>10</sub> emissions
    - 11) Indication of compliance status with Special Condition 2.A.
3. **Record Keeping and Reporting Requirements**
  - A. NNSA shall maintain all records required by this permit for not less than five years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request. These records shall include MSDS for all materials used.
  - B. NNSA shall report to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than 10 days after the end of the month during which any record required by this permit shows an exceedance of a limitation imposed by this permit.