



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII
901 NORTH 5TH STREET
KANSAS CITY, KANSAS 66101

FEB 23 2012

Ms. Kyra L. Moore, Director
Air Pollution Control Program
Missouri Department of Natural Resources
PO Box 176
Jefferson City, MO 65102

RE: Proposed Construction Permit
Kansas City Power & Light Company -- Montrose,
Installation ID 083-0001,
Project No. 2011-10-020

Dear Ms. Moore:

A draft of the Kansas City Power & Light Company – Montrose Generating Station permit to construct (PSD) was placed on public notice on February 22, 2012 by the Missouri Department of Natural Resources (MDNR). The United States Environmental Protection Agency, Region 7 (EPA) has reviewed this draft construction permit and is providing the following comment to MDNR in an effort to ensure that the project will meet federal CAA requirements, that the permit will provide necessary information so that the basis for the decision is transparent and readily accessible to the public, and that the record provides adequate support for the permit decision.

Comment 1 – Reporting Requirements:

The draft construction permit reporting requirements, as specified in Special Condition 4. A., state that “Kansas City Power & Light Company – Montrose Generating Station shall report CO emissions in their current semi-annual monitoring (SAM) report and in the annual compliance certification.” This statement describes the “how to report” emissions but does not describe the “what to report.” The EPA recommends that MDNR add specificity in Special Section 4. A., which reflects the standards of performance for Best Available Control Technology as specified in Special Condition 1.

Therefore, EPA recommends that MDNR add the following to Special Condition 4. A:

“The semi-annual monitoring report (SAM) and the annual compliance certification shall include:
i.) The total annual emission from Unit 1, Unit 2 and Unit 3 based on a 30-day rolling average for each month in the reporting period;

ii) Average hourly CO ppm data from the CEMS and hourly output data, in #/mmbtu heat input, from the data acquisition and handling system as required in Special Condition 2.D.; and
iii) Any / all Quality Assurance or Quality Control data used in calculating the monthly average emission rate and annual total emission rate.”

If you have any questions, please contact Bob Cheever by phone at 913.551.7980 or email at cheever.robert@epa.gov. Thank you again.

Sincerely,



Mark A. Smith
Air Permitting and Compliance Branch
EPA Region 7

cc: Susan Heckenkamp – MDNR
David Little – MDNR