



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RESEARCH TRIANGLE PARK, NC 27711

SEP 17 2015

OFFICE OF
AIR QUALITY PLANNING
AND STANDARDS

Mr. Steve Courtney
Kansas City Power and Light
P.O. Box 418679
Kansas City, Missouri 64141-9679

Dear Mr. Courtney,

This letter is in response to your alternative test method request dated March 18, 2015. In that letter, coupled with the additional information received on March 31, 2015, and May 26, 2015, you request approval to use an alternative test method at 12 electric utility steam generating units located at the following facilities: Hawthorn Generating Station, Kansas City, Jackson County, Missouri; Iatan Generating Station, Weston, Platte County, Missouri; La Cygne Generating Station, La Cygne, Linn County, Kansas; Lake Road Station, St. Joseph, Buchanan County, Missouri; Montrose Generating Station, Clinton, Henry County, Missouri; and Sibley Generating Station, Sibley, Jackson County, Missouri. These facilities are owned by Kansas City Power and Light (KCPL).

According to the information provided, the 12 units included in your request are subject to the particulate matter (PM) requirements of 40 CFR 63, Subpart UUUUU, or the Mercury Air Toxics Standards (MATS). The MATS requires that compliance with its PM limits be demonstrated through the use of quarterly emissions testing or through the installation and operation of a PM continuous emissions monitoring system (CEMS). As specified by MATS, the required quarterly compliance testing and the required certification and quality assurance (QA) testing necessary to certify the PM CEMS must be conducted using Method 5 (40 CFR 60, Appendix A) with a filter temperature of $320 \pm 25^\circ\text{F}$ (MATS M5). Additionally, several facilities included in your request are subject to 40 CFR 60, Subpart D (Subpart D) and 40 CFR 60, Subpart Da (Subpart Da), which require the use of Method 5 (M5), Method 5B (40 CFR 60, Appendix A, M5B) or MATS M5. To avoid the burden of having to conduct the compliance testing and the certification and ongoing QA testing of the PM CEMSs installed on the above referenced units using multiple test methods, your letter requests that KCPL be allowed to use Method 5I (40 CFR 60, Appendix A, M5I) as an alternative to the test methods specified by MATS, Subpart D and Subpart Da. The table below contains a list of the affected units, the MATS compliance methodology to be used, and indicates the units also subject to New Source Performance Standards (NSPS), Subparts D or Da.

State	Facility Name	Facility ID (ORISPL)	Unit ID	MATS Compliance Method (PM CEMS or Quarterly Testing)	Subject to NSPS
MO	Hawthorn	2079	5A	Quarterly Testing	Subpart Da
MO	Iatan	6065	1	PM CEMS	Subpart D
MO	Iatan	6065	2	PM CEMS	Subpart Da
KS	La Cygne	1241	1	PM CEMS	
KS	La Cygne	1241	2	PM CEMS	Subpart D
MO	Lake Road	2098	6	Quarterly Testing	
MO	Montrose	2080	1	Quarterly Testing	
MO	Montrose	2080	2	PM CEMS	
MO	Montrose	2080	3	PM CEMS	
MO	Sibley	2094	1	PM CEMS	
MO	Sibley	2094	2	PM CEMS	
MO	Sibley	2094	3	PM CEMS	

After reviewing the information provided, we approve your request to use M5I to conduct the quarterly compliance testing and/or the certification and ongoing QA testing of the PM CEMSs installed on the above referenced units to demonstrate compliance with MATS, Subpart D, and Subpart Da, provided the following conditions are met:

- Method 5I must be conducted with a sample temperature through the filter of $325 \pm 25^\circ\text{F}$.
- The filter holder drying temperature discussed in Method 5I, section 8.1.2.b. should be $325 \pm 25^\circ\text{F}$.
- If a “Paired Train Outlier” (Method 5I, section 12.2) is identified, the data from those trains is considered invalid and may not be used.

Since this alternative method could be applicable to other similar facilities subject to MATS, we will be posting this letter on our website at <http://www.epa.gov/ttn/emc/approalt.html> for use by other interested parties. If you have any questions regarding this determination, please contact Kim Garnett at (919) 541-1158 (garnett.kim@epa.gov).

Sincerely,



Steffan M. Johnson, Group Leader
Measurement Technology Group

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