



Missouri Department of dnr.mo.gov

NATURAL RESOURCES

Michael L. Parson, Governor

Dru Buntin, Director

February 17, 2022

Meg McCollister
Regional Administrator
U.S. EPA, Region VII
11201 Renner Boulevard
Lenexa, KS 66219

Dear Meg McCollister:

The Missouri Department of Natural Resources' Air Pollution Control Program (Air Program) hereby submits the following State Implementation Plan (SIP) revision for your approval:

Evergy - Lake Road Sulfur Dioxide Consent Agreement - 2021 Revision

Through this submission, the Air Program is requesting that the U.S. Environmental Protection Agency (EPA) take the following actions:

- Approve Amendment #2 to Administrative Order on Consent No. APCP 2015-118 for the Evergy, Inc. – Lake Road Generating Station as a revision to the Missouri State Implementation Plan.
- Remove items (32) and (33) in 40 CFR 52.1320(d) as the above SIP revision replaces those items.

The Missouri Air Conservation Commission adopted this SIP revision at the January 27, 2022 commission meeting. The commission has full legal authority to develop SIP revisions pursuant to Section 643.050 of the Missouri Air Conservation Law. The Air Program held a public hearing for this proposed SIP revision on December 2, 2021. The Air Program accepted comments on the proposed SIP revision from November 1, 2021 through December 9, 2021. During the public comment period, the Air Program received no comments

The Air Program is providing a searchable pdf version of this submittal through EPA's State Planning Electronic Collaboration System (SPECS) and the Air Program will post the complete submittal package on our website.

Thank you for your attention to this matter. If you have any questions regarding this submittal, please contact Mr. Mark Leath with the Missouri Department of Natural Resources' Air

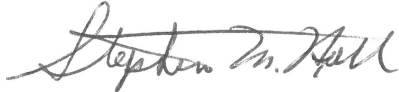


Meg McCollister
Page Two

Pollution Control Program at P.O. Box 176, Jefferson City, MO 65102 or by telephone at (573) 751-4817.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

A handwritten signature in cursive script that reads "Stephen M. Hall".

Stephen M. Hall
Director

SMH:fcc

Enclosures:

Copy of SIP revision and appendix
Copy of signature pages certifying MACC adoption
Copy of public hearing notices
Copy of public hearing transcript introductory statement
Copy of recommendation for adoption

c: Missouri Air Conservation Commission
File: 1971-SO2-6-Every-Consent-Agreement-Revision

Missouri State Implementation Plan Revision

**Evergy – Lake Road Sulfur Dioxide
Consent Agreement – 2021 Revision**

**Prepared for the
Missouri Air Conservation Commission**



**Adoption
January 27, 2022**

**Missouri Department of Natural Resources
Division of Environmental Quality
Air Pollution Control Program
Jefferson City, Missouri**

This page intentionally left blank.

Table of Contents

Executive Summary	1
1. Background.....	2
2. Amendment # 2 to Administrative Order on Consent.....	4
2.1 Fuel Requirements	5
2.2 Removal of Numeric Emission Rate Limits.....	6
2.3 Reporting and Recordkeeping Requirements.....	7
3. Lake Road SO₂ Emission Trends.....	8
4. 2010 SO₂ Standard	9
5. Public Participation.....	9
Conclusion	10

List of Tables

Table 1 – Lake Road Generating Station Units

Table 2 – Comparing the 2016 AOC and Amendment #1 to Amendment #2

Table 3 – Amendment #2 Fuel Requirements for Lake Road Emission Units

Table 4 – Emission Rate Comparison for Previous AOC and Amendment #2

Figure

Figure 1 – Lake Road SO₂ Emission Trends

Appendix

Appendix 1 – Amendment #2 to Administrative Order on Consent No. APCP 2021-118 -
Energry, Inc. – Lake Road Generating Station

Executive Summary

The purpose of this plan is to incorporate Amendment #2 of the Administrative Order on Consent (AOC) No. APCP-2015-118 into Missouri's State Implementation Plan (SIP). The parties to the AOC are the Missouri Department of Natural Resources' Air Pollution Control Program (Air Program) and Evergy, Inc. (Evergy). The AOC includes enforceable requirements to control sulfur dioxide (SO₂) emissions at the Lake Road Generating Station (Lake Road).

In 2000, the Air Program issued a Consent Decree to the company that owned Lake Road at the time, St. Joseph Light & Power Company. The purpose of the 2000 Consent Decree was to support a 2001 attainment demonstration for SO₂ concentrations in the area surrounding Lake Road. EPA approved the 2000 Consent Decree and 2001 attainment demonstration into Missouri's SIP in November of 2001.

Since then, Lake Road has implemented several changes that have reduced SO₂ emissions and resulted in improved air quality in the area surrounding the facility. In addition, Lake Road changed ownership from St. Joseph Light & Power Company to Kansas City Power and Light (KCP&L). The Air Program incorporated many of these changes into an AOC that was issued to KCP&L in 2016 (2016 AOC) and subsequently amended in 2018 (Amendment #1). The Air Program also developed a 2018 attainment demonstration for Lake Road to replace the 2001 attainment demonstration. EPA approved the 2016 AOC, Amendment #1 and the 2018 attainment demonstration in August of 2019.

The Air Program is updating the enforceable requirements to reflect the current actual operating conditions at Lake Road, which is now owned by Evergy. This includes new fuel restrictions and the retirement of one of the boilers at the facility. Amendment #2 consolidates the necessary requirements into a single document and streamlines the necessary reporting requirements at Lake Road as a result of the updated fuel restrictions. Upon EPA approval, this plan will fully replace the 2018 attainment demonstration, the 2016 AOC, and Amendment #1 in Missouri's SIP.

1. Background

Evergy is an electric utility company serving the Kansas City metropolitan area. Evergy became the current owner and operator of Lake Road after KCP&L and Westar Energy merged to become Evergy in 2018. Prior to that KCP&L was the owner and operator of the facility, and prior to KCP&L ownership, St. Joseph Light and Power Company owned and operated the facility. Lake Road is an electric generating facility located in Buchanan County, Missouri. Its main emission sources include five (5) boilers and three (3) combustion turbines. Table 1 shows the list of these units and their corresponding generating capacities.

Table 1 - Lake Road Generating Station Units

Unit	Capacity (MW)
Boiler No. 1	25
Boiler No. 2	25
Boiler No. 4	25
Boiler No. 5	25
Boiler No. 6	104.3
Combustion Turbine 5	65.2
Combustion Turbine 6	25
Combustion Turbine 7	25

On April 11, 1997 and October 26, 1997, the St. Joseph Levee ambient air monitor recorded exceedances of the 1971 SO₂ 24-hour standard of 0.14 parts per million (ppm). These two exceedances of the 24-hour standard in one calendar year constituted a violation of the 1971 SO₂ standard. There was also a third exceedance on June 3, 1998. At the time, the Air Program determined that Lake Road was the only significant source of SO₂ emissions in the area.

On October 6, 2000, the Air Program and St. Joseph Light and Power Company entered into a Consent Decree (the 2000 Consent Decree) to resolve the 1997 and 1998 SO₂ exceedances recorded at the St. Joseph Levee monitor. On March 21, 2001, the Missouri Air Conservation Commission (MACC) adopted an SO₂ attainment plan for Lake Road. The plan incorporated the control strategies stipulated in the 2000 Consent Decree. In the attainment demonstration plan, dispersion modeling demonstrated the fuel types and emission limits were sufficient to maintain compliance with the 1971 SO₂ 24-hour standard. EPA approved the 2001 attainment plan on November 15, 2001.¹

On March 30, 2015, KCP&L, who had taken ownership of Lake Road, submitted a notification letter to the Air Program. The notification letter stated KCP&L's intent to cease the combustion of coal in Boiler No. 6 at the facility by April 16, 2016 to comply with the Utility Mercury and Air Toxics Standards rule.

Subsequently, Lake Road applied for an amendment to its construction permit (052015-014A) to incorporate federally enforceable synthetic minor limits for hazardous air pollutants. Nothing in

¹ See 66 FR 57389, November 15, 2001

the amended permit prohibited the installation from requesting to combust coal in Boiler No. 6 in the future. In 2016, the Air Program and KCP&L executed an AOC to ensure the permanence of the fuel change away from coal in Boiler No. 6. The 2016 AOC also carried forward all other requirements of the 2000 Consent Decree. The intent was to submit the 2016 AOC as a replacement to the 2000 Consent Decree in Missouri's federally approved SIP.

In February 2018, KCP&L requested an amendment (Amendment #1) to the 2016 AOC to remove the requirement to blend high and medium sulfur coal with low sulfur coal in Boiler No. 5. In Amendment #1, KCP&L agreed to only burn low sulfur coal in Boiler No. 5. The Air Program granted this request and changed the required sampling frequency for the sulfur content in the coal from daily to a per coal shipment basis and executed Amendment #1 to the 2016 AOC accordingly. In November of 2018, the Air Program submitted the 2016 AOC and Amendment #1 to EPA as a SIP revision. The Air Program also developed an updated attainment demonstration for Lake Road to accompany that SIP revision. EPA approved that SIP revision in August of 2019. The 2018 plan fully replaced the original attainment demonstration and the 2000 Consent Decree in Missouri's federally approved SIP.

The purpose of this SIP revision is to replace the 2016 AOC and Amendment #1 with Amendment #2 to the AOC. This new amendment carries forward the necessary requirements included in the 2016 AOC and Amendment #1. It establishes new, more protective, fuel requirements for the emission units at the facility and reflects the current actual operating conditions at Lake Road. This new amendment also streamlines the reporting and record-keeping requirements as a result of the updated fuel requirements. Due to the new and more protective requirements in Amendment #2, this SIP revision inherently complies with the anti-backsliding requirements of Clean Air Act Section 110(l).

2. Amendment # 2 to Administrative Order on Consent

On June 2, 2021, Evergy requested a second amendment to the AOC. The request to amend the AOC had three purposes:

- strengthen the enforceable fuel requirements at Lake Road,
- reflect the retirement of Boiler No. 3, and
- streamline the reporting and recordkeeping requirements associated with the AOC

The Air Program coordinated with Evergy to develop the necessary language in Amendment #2 of the AOC. Since the 2016 AOC and Amendment #1 are currently part of Missouri’s SIP, the Air Program needs to submit this second amendment to EPA for approval into the SIP. The purpose of the SIP revision is to fully subsume and replace the 2016 AOC and the 2018 Amendment #1 in the SIP with Amendment #2 to the AOC. Amendment #2 is a stand-alone document that ensures all the necessary requirements from the original 2000 Consent Decree, the 2016 AOC, and Amendment #1 remain in place at Lake Road, while also accomplishing the three purposes listed above.

Table 2 provides a comparison of the material differences between Amendment #2 and the 2016 AOC with Amendment #1. The following subsections provide a more detailed description of each of these changes.

Table 2 - Comparing the 2016 AOC and Amendment #1 to Amendment #2

2016 AOC and Amendment #1	Amendment #2
Fuel oil sulfur content limit: 500 ppm	Fuel oil sulfur content limit: 15 ppm
“Fuel oil” not defined	“Fuel oil” defined
“Low sulfur coal” not defined	“Low sulfur coal” defined
Boiler No. 3 fuel and emission requirements	Boiler 3 retired
Allowed deviation of the fuel requirements with Air Program approval	Clarifies that the Air Program may grant temporary exemptions for the fuel requirements in the AOC in the event that unforeseen circumstances would make an alternative fuel substantially more reasonable during a specified time frame.
Numeric emission rate requirements for all boilers and turbines	No numeric emission rate requirements
Quarterly fuel certification reporting requirements	Annual certification for fuel requirements and continuous recordkeeping of sulfur content for all fuel deliveries.
Coal sampling for sulfur content with every coal shipment	

2.1 Fuel Requirements

In the 2016 AOC and Amendment #1, the fuel oil sulfur content for Boiler Nos. 1, 2, 4, and 6, and Combustion turbine Nos. 5, 6, and 7 was 500 ppm, or 0.05% by weight or less. Amendment #2 lowers the allowable sulfur content for the fuel oil in these emissions units to 15 ppm, or 0.0015% by weight or less. This change strengthens the requirements at the facility, which further protects SO₂ air quality in the area surrounding Lake Road. In addition, the previous AOC did not define fuel oil. Amendment #2 specifies that fuel oil includes but is not limited to the following fuels so long as the sulfur content limitation is met: No 2. fuel oil; diesel fuel; biodiesel; blends of these fuels; and other fuels approved by the Air Program and meeting the sulfur limit.

Both Amendment #1 of the 2016 AOC and Amendment #2 had low sulfur coal listed as the primary fuel for Boiler No. 5. However, the Amendment #1 to the 2016 AOC did not include a definition for low sulfur coal. Instead it included an equation that Lake Road needed to use to ensure the sulfur content met the numeric SO₂ emission rate limit of the 2016 AOC. Amendment #2 provides a clear definition of low-sulfur coal that accomplishes the same level of stringency as the 2016 AOC and Amendment #1 for Boiler No. 5 without the need to include the equation. Amendment #2 defines low-sulfur coal as coal with an SO₂ emission potential of 1.349 lbs. SO₂/mmBtu or less.

Amendment #2, also removes the fuel requirements for Boiler No. 3 that were in the previous AOC. Since Boiler No. 3 is retired, Amendment #2 disallows the future operation of Boiler No. 3, which renders any fuel requirements for the boiler irrelevant.

Table 3 provides all the fuel requirements included in Amendment #2.

Table 3 - Amendment #2 Fuel Requirements for Lake Road Emission Units

Emission Unit	Primary Fuel	Secondary Fuel
Boiler Nos. 1, 2, 4, and 6	Natural Gas	Fuel Oil
Boiler No. 5	Coal (low sulfur)	Natural Gas
Combustion Turbine No. 5	Natural Gas	Fuel Oil
Combustion Turbine Nos. 6 and 7	Fuel Oil	Natural Gas

The final change related to fuel requirements in Amendment #2 is that the previous AOC included language that would allow Lake Road to use fuels not listed in the table if they received prior approval from the Air Program. By adding the definition of fuel oil to Amendment #2, it provides some prescriptive flexibility for Lake Road to use some alternative fuels while retaining the sulfur content stringency. This eliminates most of the need for flexibility that the previous language provided; however the facility may still need some flexibility in the event of extenuating or unforeseen circumstances. Therefore, Amendment #2 removes the previous language and adds a new paragraph to provide temporary exemptions to the listed fuel requirements due to unforeseen circumstances. This new language provides a prescriptive process for Lake Road to seek and receive a temporary exemption to use a fuel not listed in the AOC. This ensures that flexibility exists in the event that extenuating temporary circumstances

would make the use of such alternative fuel far more reasonable than the fuels listed in the AOC. Amendment #2 does not specify any examples of circumstances where the Air Program would grant such an exemption. However, some examples where a temporary exemption pursuant to this new paragraph might apply include unforeseen pipeline or fuel supply disruptions, extreme weather events, and natural disasters, among other similar circumstances.

2.2 Removal of Numeric Emission Rate Limits

The previous AOC and Amendment #1 included a table with numeric SO₂ emission rate limits for all six (6) boilers (Boiler No. 3 included) and the three (3) combustion turbines at Lake Road. Amendment #2 does not include these numeric emission rate limits for any of these units. These limits are no longer necessary due to the more stringent fuel requirements included in Amendment #2. The limits in 2016 AOC with Amendment #1 were based on the worst case potential emission rate of the previously compliant fuels. With Amendment #2, the worst case potential emission rate at all of the units included in the AOC are either equal to or less than the old emission rate limits, which renders them irrelevant. Table 4 provides a comparison of the old emission rate limits and the new worst case potential emission rate based on the compliant fuels in Amendment #2.

Table 4 - Emission Rate Comparison for Previous AOC and Amendment #2

Unit	Previous Emission Rate Limits		Fuel Requirement Comparison		New Worst Case Potential Emission Rate (lbs. SO ₂ /mmBtu)
	lbs. SO ₂ /hr.	lbs. SO ₂ /mmBtu	Fuel that previous emission rate is based on	New fuel requirement (worst case/maximum sulfur option)	
Boiler No. 1	10.06	0.0524	Fuel Oil (500 ppm)	Fuel Oil (15 ppm)	0.00152
Boiler No. 2	10.06	0.0524	Fuel Oil (500 ppm)	Fuel Oil (15 ppm)	0.00152
Boiler No. 3	0.15	0.0006	Natural Gas	Retired	N/A
Boiler No. 4	16.29	0.0524	Fuel Oil (500 ppm)	Fuel Oil (15 ppm)	0.00152
Boiler No. 5	453.26	1.3490	Coal (high/medium and low sulfur blend)	Coal (low sulfur)	1.3490
Boiler No. 6 *	1400.00	---	Coal (high/medium and low sulfur blend)	Fuel Oil (15 ppm)	0.00152
Combustion Turbine 5	44.30	0.0511	Fuel Oil (500 ppm)	Fuel Oil (15 ppm)	0.00152
Combustion Turbine 6	14.05	0.0511	Fuel Oil (500 ppm)	Fuel Oil (15 ppm)	0.00152
Combustion Turbine 7	15.12	0.0511	Fuel Oil (500 ppm)	Fuel Oil (15 ppm)	0.00152

* The lbs. SO₂/hr. emission rate for Boiler No. 6 in the previous AOC was based on the emission rate achievable with high and medium sulfur content blends of coal in the boiler. Under Amendment #2, the worst case scenario for SO₂ emissions in the boiler is based on fuel oil with 15 ppm sulfur content. The boiler has a maximum design rate of 980 mmBtu/hour. Multiplying the new worst case fuel emission rate in lbs. SO₂/mmBtu by the maximum design rate yields a potential emission rate of 1.5 lbs. SO₂/hr. This is substantially less than the hourly emission rate limit in the previous AOC.

The following bullets provide a narrative description of the justification for the removal of the previous numeric SO₂ emission rate limits for all the boilers and turbines included in the AOC –

- Boiler No. 3 is now retired, meaning no emissions are expected from that emission unit in the future. This renders the previous emission rate limit irrelevant.
- For Boiler No. 5, the requirement regarding the SO₂ emission potential for all coal burned in the boiler will ensure the actual emission rate for the boiler will always be less than or equal to the previous emission rate limit for that boiler.
- For Boiler No. 6, the new worst case potential emission rate is 0.1 percent of the previous allowable rate. This renders the previous emission rate limit irrelevant.
- As a result of the new requirement of 15 ppm sulfur content for fuel oil, the new worst case potential SO₂ emission rate is only 3 percent of the level of the previous allowable emission rates for all other boilers and turbines listed in the AOC. This renders all of the previous emission rate limits for these emission units irrelevant.

2.3 Reporting and Recordkeeping Requirements

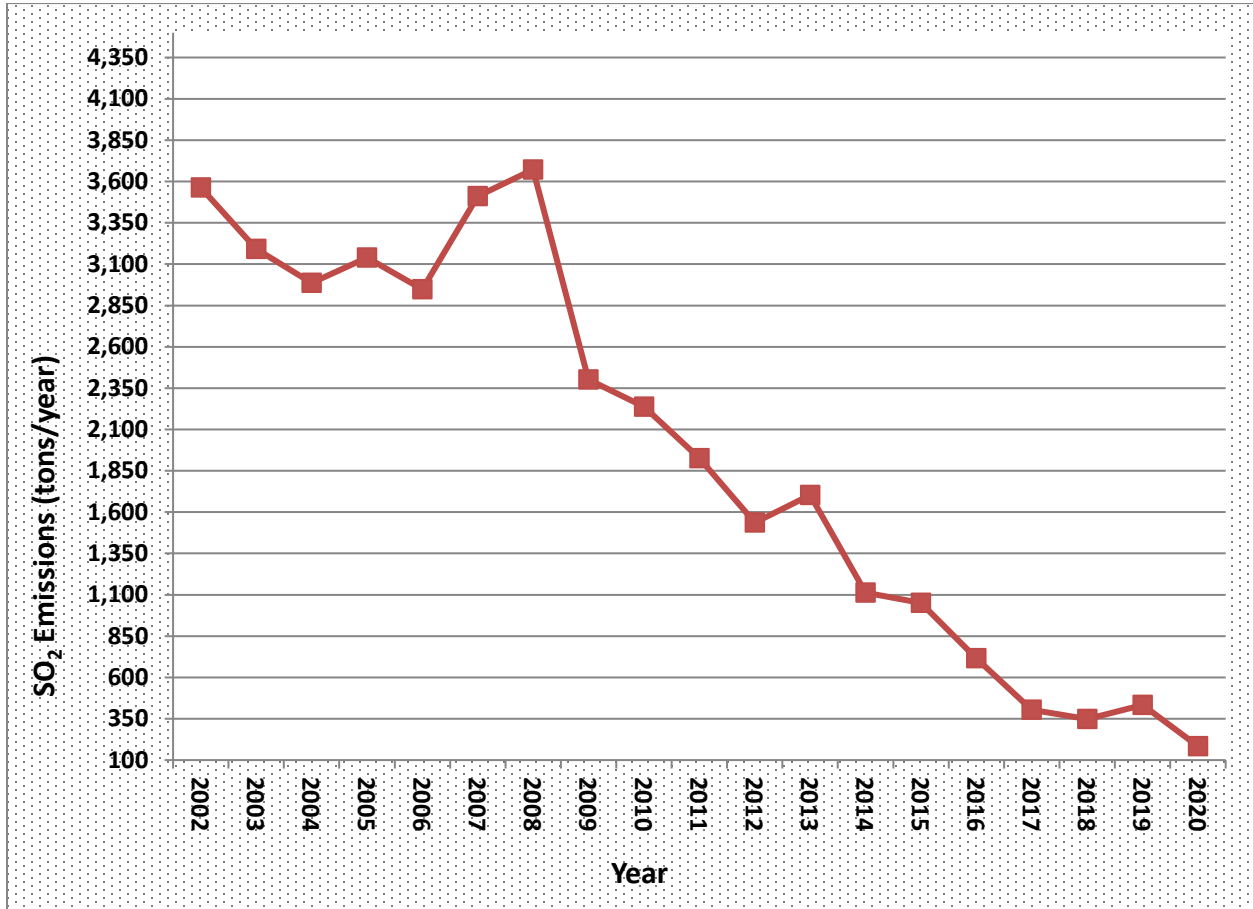
The 2016 AOC and Amendment #1 required Lake Road to sample every coal shipment they received to determine the sulfur content and calculate the SO₂ emission potential of the coal. The 2016 AOC and Amendment #1 also required fuel supplier certifications of the sulfur content for all fuel oil shipments. Finally, the 2016 AOC and Amendment #1 required Lake Road to submit this information to the Air Program every calendar quarter. Amendment #2 streamlines the reporting and recordkeeping requirements to reduce the unnecessary administrative burden on Lake Road. Amendment #2 requires Lake Road to maintain records demonstrating the sulfur content of all coal shipments and fuel oil deliveries meet the sulfur content requirements of the AOC.

Amendment #2 eliminates the prescriptive requirement for Lake Road to sample every coal shipment they receive, and allows for records provided by their fuel supplier to meet the compliance demonstration requirements. Amendment #2 also eliminates the need for Lake Road to submit quarterly compliance demonstrations, and instead provides a template they can submit on an annual basis. Amendment #2 does stipulate that Lake Road must maintain the fuel records to demonstrate compliance for at least five years and Lake Road must provide these records to any Air Program personnel upon request.

3. Lake Road SO₂ Emission Trends

Emissions from Lake Road have been decreasing steadily over the last 20 years. The new fuel requirements included in Amendment #2 will ensure these emission reductions remain permanent. As shown in Figure 1, SO₂ emissions have decreased by 94.84 percent from 2002 to 2020. A sizable portion of the decrease in emissions is attributable to the 2000 Consent Decree and the fuel requirements provided in the 2016 AOC, Amendment #1, and Amendment #2.

Figure 1 - Lake Road SO₂ Emission Trends



4. 2010 SO₂ Standard

On June 22, 2010, EPA established a new SO₂ standard of 75 parts per billion (ppb). The standard is based on the three-year average of the annual 99th percentile of 1-hour daily maximum concentrations.² The 2010 SO₂ standard replaced the previous 24-hour and annual SO₂ standards promulgated in 1971.³ When EPA established the 2010 SO₂ standard, it triggered a requirement for them to designate all areas of the country as attainment (meeting the standard), nonattainment (not meeting the standard or contributing to a nearby area not meeting the standard), or unclassifiable (unable to determine whether the area is meeting or not meeting the standard).

EPA took a tiered approach for designating areas under the 2010 SO₂ standard. The tiered approach included four separate rounds of designations. The first round only included areas where existing monitoring data indicated a violation of the standard. In the second round, EPA designated areas surrounding facilities around the country with the highest SO₂ emissions. In the third round, EPA designated all remaining areas except for areas surrounding facilities that had installed and began operating new ambient SO₂ monitors by January 1, 2017. The fourth and final round was for these remaining areas that had installed the new SO₂ monitors.

EPA designated Buchanan County, where Lake Road is located, during the third round.⁴ EPA designated the area as attainment/unclassifiable, meaning the area surrounding Lake Road complies with the 2010 SO₂ standard.

5. Public Participation

In accordance with Section 110(a)(2) of the Clean Air Act, the Missouri Air Conservation Commission (MACC) will hold a public hearing prior to adoption of this SIP revision and the subsequent submittal to EPA. The Air Program notified the public and other interested parties of the public hearing and comment period at least 30 days prior to the public hearing for this SIP revision. Specifically –

- Notice of availability of the proposed SIP revision and announcement of the public hearing was posted on the Air Program’s website by November 1, 2021.
- The MACC held a public hearing to receive comments for this SIP revision on December 2, 2021.
- The Air Program opened a public comment period after posting the SIP revision on the Air Program’s website. The public comment period closed on December 9, 2021, seven (7) days after the public hearing.

² See 75 FR 35520; June 22, 2010

³ See 36 FR 8187; April 30, 1971

⁴ See 83 FR 1098, January 9, 2018

Conclusion

Through this action, the Air Program is submitting Amendment #2 to AOC No. APCP-2015-118 for inclusion in Missouri's SIP. The Air Program is requesting through this action for EPA to fully replace the 2016 AOC and the 2018 Amendment #1 in Missouri's federally approved SIP.

Amendment #2 to the AOC makes the retirement of Boiler No. 3 at Lake Road permanent and enforceable, requires a maximum sulfur content of 15 ppm for fuel oil used in the boilers and turbines listed in the AOC, and clarifies and retains the previous AOC sulfur content requirement for all coal used in Boiler No. 5 at Lake Road. Amendment #2 also streamlines the necessary recordkeeping and reporting requirements for Evergy to demonstrate compliance with the AOC requirements at Lake Road. This action strengthens the SO₂ emission control requirements in Missouri's SIP, while also reducing the administrative reporting burden on the owner of the facility. The Air Program prepared this SIP revision in accordance with the Clean Air Act, Missouri statutes, and corresponding state and federal regulations.

Appendix 1

Amendment #2 to Administrative Order on Consent No. APCP 2021-118 Evergy, Inc. – Lake Road Generating Station

BEFORE THE MISSOURI DEPARTMENT OF NATURAL RESOURCES

In the Matter of:)
)
EVERGY, INC. – LAKE ROAD GENERATING) No. APCP-2015-118
STATION)
)
)

AMENDMENT #2
TO
ADMINISTRATIVE ORDER ON CONSENT

The issuance of this second amendment (Amendment #2) to the administrative order on consent (AOC) No. APCP-2015-118 by the Missouri Department of Natural Resources (Department) is a formal administrative action taken by the State of Missouri after conference with EVERGY, INC. – LAKE ROAD GENERATING STATION (Evergy). The parties agree this amendment to the AOC is being issued to administer, implement, and enforce the purposes of the Missouri Air Conservation Law, Chapter 643, RSMo, and its implementing regulations and is not the result of any past or current violations. The parties agree that this AOC is being issued under 643.060(4), RSMo. Evergy further agrees that a failure to comply with this amendment to the AOC is a violation of the Missouri Air Conservation Law under Section 643.151, RSMo.

I. BACKGROUND

1. On or about May 25th, 2001 the Circuit Court of Buchanan County entered a Consent Decree in Case No. 01-CV-74164 (Consent Decree) requiring St. Joseph Light & Power Company to undertake an SO₂ emissions reduction program in order to attain the 1971 national ambient air quality standard for SO₂ as required by the federal Clean Air Act of 1990. The SO₂ emissions program outlined in the Consent Decree contained terms requiring St. Joseph Light & Power Company, and their successors, assigns, agents, subsidiaries, affiliates, and lessees to use certain fuel in each combustion unit, unless otherwise authorized by the

Department. Evergy, as a successor, assign, agent, subsidiary, affiliate, or lessee, of the St. Joseph Light & Power is bound by the terms of the Consent Decree.

2. On March 30, 2015, Kansas City Power & Light (KCP&L) submitted a letter to the Department as notification of their intent to cease the combustion of coal in the Lake Road Station Boiler No. 6 by April 16, 2016. Prior to April 16, 2016, Boiler No. 6 combusted coal as the primary fuel and natural gas as a secondary fuel.
3. On April 6, 2016, AOC No. APCP-2015-118 was executed by the Department and KCP&L in response to the March 30, 2015 KCP&L request. The 2016 AOC served three purposes:
 - a. Provide concurrence for changing the previously stated Boiler No. 6 SO₂ control strategy from the primary fuel of coal to natural gas and change the secondary fuel from natural gas to No. 2 fuel oil;
 - b. Clarify that the terms “primary” and “secondary” related to fuels are an indicator of priority of typical usage but are not restrictive to the actual fuel combusted; and
 - c. To carry forward into the AOC the stipulated requirements for other Lake Road emission units embodied in the Consent Decree. The agreement embodied in the AOC subsumed and replaced the Consent Decree.
4. In February 2018, KCP&L requested a modification to the AOC to remove the requirement to blend high and medium sulfur coal with low sulfur coal in Boiler No. 5. Only low sulfur coal would be utilized. Additionally, KCP&L requested a modification of the monitoring requirement for the sulfur content of the coal, specifically replacing the required daily coal sample with a requirement to collect one sample per coal shipment.

5. On June 13, 2018, Amendment #1 to AOC, No. APCP-2015-118 was executed in response to the KCP&L request. As a result of Amendment #1, KCP&L agreed to discontinue the blending of high and medium sulfur coal with low sulfur coal and to begin using only low sulfur coal in Boiler No. 5. The associated fuel requirements table and monitoring requirements in the AOC were also amended accordingly.

6. On June 2, 2021, Evergy requested a modification to the AOC to address the following:
 - Retirement of Boiler No. 3;
 - Evergy's intent to fire a lower sulfur fuel oil; and
 - A request to streamline the compliance requirements provided in the AOC given the reduction in actual and allowable emissions as the result of the AOC Amendment.

7. This AOC, Amendment #2, will subsume and replace the 2016 AOC and 2018 AOC Amendment #1, which together subsumed and replaced the Consent Decree. This Amendment #2 does not originate from an enforcement action.

II. AGREEMENT

8. The Department and Evergy agree that this AOC shall not be construed as a waiver or modification of any requirements of the Missouri Air Conservation Law and regulations or any other source of law, and that this AOC does not resolve any claims based on any failure of Evergy to meet the requirements of this AOC, or claims for past, present or future violations of any permits, statutes, or regulations.

9. The provisions of this AOC shall apply to and be binding upon the parties executing this AOC, their agents, subsidiaries, successors, assigns, affiliates, and lessees, including officers, agents, servants, corporations and any persons acting under, through or for the parties agreeing hereto. Any changes in ownership or corporate status, including but not limited to any transfer of assets or real or personal property, shall not affect the responsibilities of Evergy under this AOC. If Evergy sells or otherwise transfers its business or the real estate that is the situs of this AOC, then Evergy shall cause as a condition of such sale or transfer, that the buyer will assume the obligations of Evergy under this AOC in writing. In such event, Evergy shall provide thirty (30) days prior written notice of such assumption to the Department. Any notification shall be mailed to the Departments' Air Pollution Control Program at P.O. Box 176, Jefferson City, MO 65102-0176.
10. In light of the mutual promises contained herein, the parties agree to the requirements set forth in paragraphs 11 – 24.

III. BOILER NO. 3 RETIREMENT

11. Evergy agrees that it will be a violation of this AOC to operate Boiler No. 3 at Lake Road after Amendment #2 of this AOC is executed by both parties.

IV. FUEL REQUIREMENTS

12. Unless exempted by paragraph 12.A., Evergy agrees that the emission units at Lake Road that are listed in Table 1 of this AOC shall operate in accordance with the fuel requirements provided in Table 1. The terms “primary” and “secondary” related to the fuels are an indicator of priority of typical usage but are not restrictive to the actual fuel combusted. The sulfur content of the fuel oil¹, as

¹ For purposes of this Agreement, fuel oil includes but is not limited to the following fuels so long as the sulfur content limitation is met: No 2. Fuel Oil; Diesel Fuel; Biodiesel; blends of these fuels; and other fuels approved by the Department and meeting the sulfur limit.

described in footnote 1, purchased for use in Boiler Nos. 1, 2, 4, and 6 and combustion turbine Nos. 5, 6, and 7 shall not exceed 0.0015% by weight (15 ppm). Evergy may combust propane in place of fuel oil or coal in the boilers for light-off and flame stabilization during periods of natural gas curtailment and for testing of the propane combustion system.

A. Temporary Exemptions for Fuel Requirements – Evergy may request, and the Department may grant, temporary exemptions to the fuel requirements listed in Table 1 in the event an unforeseen circumstance would cause a fuel not listed in Table 1 to be substantially more reasonable during a temporary time period. For this exemption to apply, Evergy must receive written authorization from the Department prior to the use of such alternative fuel. To qualify for this temporary exemption, Evergy must notify the Department in writing. This notification must include an explanation of the unforeseen circumstance, the alternative fuel they are seeking the exemption to use, and the reason the unforeseen circumstance has made the use of such alternative fuel substantially more reasonable than the fuels listed in Table 1. The notification must also include the actions that Evergy has taken and plans to take to address the issue, and the amount of time for which they are requesting the exemption. The Department maintains the discretion to allow an exemption pursuant to this paragraph, including the duration of such exemption.

- 13. All coal delivered to Lake Road for Boiler No. 5 shall be low sulfur coal. For the purposes of this AOC, low sulfur coal is defined as coal with an SO₂ emission potential of 1.349 lbs. SO₂/mmBtu or less.

Table 1: Fuel Requirements for Lake Road Emission Units

Emission Unit	Primary Fuel	Secondary Fuel
Boiler Nos. 1, 2, 4, and 6	Natural Gas	Fuel Oil
Boiler No. 5	Coal (low sulfur)	Natural Gas
Combustion Turbine No. 5	Natural Gas	Fuel Oil
Combustion Turbine Nos. 6 and 7	Fuel Oil	Natural Gas

V. COMPLIANCE MONITORING/RECORDKEEPING

14. Evergy shall maintain records demonstrating that the sulfur content of the fuel oil purchased for use in the Boilers and Combustion Turbines listed in Table 1 does not exceed 0.0015% by weight (15 ppm). These records can include fuel delivery records or a valid purchase contract specifying the sulfur content of fuel oil sold to Evergy for use in the boilers and combustion turbines will not exceed 0.0015% by weight (15 ppm).
15. Evergy shall maintain records demonstrating that potential SO₂ emissions from each shipment of coal delivered to the Lake Road facility does not exceed 1.349 lbs. SO₂/mmBtu. These records can include coal shipment sample analysis information which includes the sulfur content, heat content, and SO₂/mmBtu emission potential from each coal shipment. They can also include other record-keeping methods approved by the Department.

VI. DELIVERABLES

16. Evergy shall submit to the Department, on an annual basis, no later than 30 days after the end of the calendar year, a Certificate of Fuel Sulfur Content (see Appendix). This certifies that only compliant fuel was charged to Boiler Nos. 1, 2, 4, 5, and 6 and combustion turbine Nos. 5, 6, and 7.
17. In the event Evergy fails to adhere to the requirements as stated in this AOC, such actions will be considered a violation of this AOC and the Missouri Air Conservation Law.

VII. OTHER PROVISIONS

18. Evergy agrees to comply with the Missouri Air Conservation Law and regulations.

19. By signing this AOC, all signatories assert that they have read and understand the terms of this AOC, that they had the opportunity to consult with counsel, and that they have the authority to sign this AOC on behalf of their respective parties.
20. This AOC shall be construed and enforced according to the laws of the State of Missouri, and the terms stated herein shall constitute the entire and exclusive agreement to the parties hereto with respect to the matters addressed herein. The terms of this AOC supersede all previous memoranda of understanding, notes, conversations and agreement whether expressed or implied. This AOC may not be modified orally.
21. The parties agree that the Department will submit this Amendment #2 to the AOC to EPA as a SIP revision to replace Amendment #1 to the AOC, and as such, is subject to EPA approval. The parties further agree that after EPA has approved the SIP revision that contains this Amendment #2 to this AOC, any subsequent modifications to this AOC, will require approval from EPA before such modifications would take effect.
22. If any provision of this AOC is found to be unenforceable in any respect, the validity, legality and enforceability of the remaining provisions shall not in any way be affected or impaired.
23. Nothing in this AOC excuses Evergy for any future non-compliance with the laws of the State of Missouri, and the Department expressly reserves the right to address future noncompliance in any manner authorized by law.
24. This AOC will become final, effective and fully enforceable upon the date the Department signs it. The Department shall send a fully executed copy of this AOC to Evergy for their records.

VIII. CORRESPONDENCE AND DOCUMENTATION

Correspondence or documentation with regard to this AOC shall be directed to the following persons, subject to change upon written notification from either party:

For the Department:

Compliance and Enforcement Section
Air Pollution Control Program
Missouri Department of Natural Resources
P.O. Box 176
Jefferson City, Missouri 65102-0176

For Evergy:

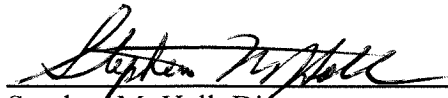
Director, Environmental Services Evergy, Inc.
P.O. Box 889
Topeka, KS 66601

IX. RIGHT OF APPEAL

By signing this AOC, Evergy waives any right to appeal, seek judicial review, or otherwise challenge this AOC pursuant to Sections 643.13, 643.085, or 621.250 RSMo, Chapter 536, 643 RSMo, 10 CSR 10-1.030, or any other source of law.

AGREED TO AND SO ORDERED:

**MISSOURI DEPARTMENT OF
NATURAL RESOURCES**



Stephen M. Hall, Director
Air Pollution Control Program
Missouri Department of Natural
Resources

10/18/2021
Date

EVERGY, INC.

Digitally signed by
Daniel R Wilkus
Date: 2021.10.06
13:37:17 -05'00'



Daniel R. Wilkus, Director
Environmental Services
Everbgy, Inc.

10/06/2021
Date

Appendix

- Annual Certification of Compliant Fuels and Fuel Sulfur Content at Lake Road Generating Station

Evergy, Inc.
Lake Road Generating Station
Certificate of Fuel Sulfur Content

Evergy, Inc. (Evergy), under agreement with the Missouri Department of Natural Resources, shall not burn fuel oil with a sulfur content greater than 0.0015% by weight (15 ppm) in Boiler Nos. 1, 2, 4, and 6 and Combustion Turbine Nos. 5, 6, and 7 at the Lake Road Generating Station. Additionally, Evergy shall not combust coal in Boiler No. 5 with an SO₂ emission potential of greater than 1.349 lb. SO₂/mmBtu.

I certify, to the best of my knowledge and belief that during the following time period _____, only compliant fuels were utilized as provided above. Any deviations or exemptions from this statement are provided in the box below.

Signed: _____

Printed Name: _____

Title: _____

Evergy, Inc. – Lake Road Generating Station

Date: _____

Order of Rulemaking

The Missouri Air Conservation Commission **ADOPTS** the following action on this 27th day of January, 2022:

Missouri State Implementation Plan Revision - Evergy – Lake Road Sulfur Dioxide Consent Agreement - 2021 Revision

Rollin R, Chairman

Michael C. Fobry, Vice Chairman

Ken Roberts, Member

Debra Bauer, Member

Angie J. Pugh, Member

_____, Member

_____, Member

Morgan, Cheri

From: Missouri DNR <modnr@modnr.dmarc.public.govdelivery.com>
Sent: Monday, November 1, 2021 9:26 AM
To: Arwe, Andrea; Rice, Heidi; Stevens, Jeffrey; Bybee, Darcy; Morgan, Cheri; Holden, Tisha; Quinn, Brian; Hall, Stephen; Wilbur, Emily; Downs, Jerry; Gilmore, David; Payne, Stan; Fredrick, Miranda; Patterson, Connie; Maliro, Patricia; Kremer, Karen; Moore, Kyra; Beydler, Van; Bloomer, Susan
Subject: Courtesy Copy: Missouri Air Conservation Commission Public Hearing - December 2, 2021

This is a courtesy copy of an email bulletin sent by Cheri Morgan.

This bulletin was sent to the following groups of people:

Subscribers of Air Public Notices (1728 recipients)



Having trouble viewing this email? [View it as a Web page.](#)



Missouri Air Conservation Commission Will Hold Public Hearing

The Missouri Air Conservation Commission will hold a public hearing on Thursday, December 2, 2021 beginning at 9 a.m. Elm Street Conference Center, 1730 East Elm Street, Lower Level, Bennett Springs Conference Room, Jefferson City, Missouri. The meeting will accommodate both in-person and online public participation with live video conferencing during the Missouri Air Conservation Commission meeting. Information for online participation is available at <https://dnr.mo.gov/commissions-boards-councils/air-conservation-commission>. The commission will hear testimony related to the following proposed actions:

- 10 CSR 10-5.381 (amendment) Onboard Diagnostics Motor Vehicle Emissions Inspection

The purpose of this proposed amendment is to remove Franklin County from the rule applicability under the motor vehicle inspection and maintenance requirements included in the Gateway Vehicle Inspection Program (GVIP) for the St. Louis area. In addition, the department is making several changes to clarify language and requirements to correspond with statutes, update materials incorporated by reference, reflect technological and operational changes since GVIP began, and add relevant definitions specific to this rule.

- Missouri State Implementation Plan Revision - Evergy – Lake Road Sulfur Dioxide Consent Agreement - 2021 Revision

The purpose of this State Implementation Plan (SIP) revision is to amend an Administrative Order on Consent (AOC) between the department and Evergy Inc. regarding the Lake Road Generating Station (Lake Road) in Buchanan County. This amendment to the AOC replaces the current version of the AOC included in Missouri’s SIP. The amendment includes more protective fuel restrictions at Lake Road and streamlines Evergy’s reporting and recordkeeping requirements associated with the AOC. These updates reflect the current actual operating conditions at Lake Road.

If the commission adopts these actions, it will be the department’s intention to submit the actions to the U.S. Environmental Protection Agency to be included in Missouri’s SIP.

Documents for the above items will be available for review at the Missouri Department of Natural Resources, Air Pollution Control Program, 1659 Elm Street, Jefferson City, (573) 751-4817 and in the Public Notices section of the program web site www.dnr.mo.gov/air/business-industry/public-notices-comments. This information will be available at least 30 days prior to the public hearing date.

The department will accept comments for the record until 5 p.m. on December 9, 2021. Please send written comments to Chief, Air Quality Planning Section, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176. Email comments may be submitted via the program web site noted above. All comments and public hearing testimony will be equally considered.

Citizens wishing to speak at the public hearing should notify the secretary to the Missouri Air Conservation Commission, Missouri Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, Missouri 65102-0176, or telephone (573) 751-7840. The department requests persons intending to give verbal presentations also provide a written copy of their testimony to the commission secretary at the time of the public hearing.

People with disabilities requiring special services or accommodations to attend the meeting can make arrangements by calling the program directly at (573) 751-4817, the Division of Environmental Quality's toll free number at (800) 361-4827, or by writing two weeks in advance of the meeting to: Missouri Department of Natural Resources, Air Conservation Commission Secretary, P.O. Box 176, Jefferson City, MO 65102. Hearing impaired people may contact the program through Relay Missouri, (800) 735-2966.\TTY.

We’d like your feedback on the service you received from the Missouri Department of Natural Resources. Please consider taking a few minutes to complete the department’s Customer Satisfaction Survey at surveymonkey.com/r/MoDNRsurvey.

Thank you.

Questions? [Contact Us](#)



Subscriber Services:

[Manage Subscriptions](#) | [Unsubscribe All](#) | [Help](#)



STAY CONNECTED:



- AIR

Calendar

NOVEMBER

1

Monday

Nov. 1 - Dec. 9 — Statewide

Proposed Missouri State Implementation Plan Revision Public Comment Period, Nov. 1, 2021 to Dec. 9, 2021

The Missouri Department of Natural Resources is proposing revisions to the Missouri State Implementation Plan (SIP). The purpose of the revision is to amend an Administrative Order on Consent (AOC...

Area of Focus: [Air](#)
 Event Type: [Public Notice/ Public Comment](#)
 Organization: [Air Pollution Control Program](#)

The Missouri Department of Natural Resources is proposing revisions to the Missouri State Implementation Plan (SIP). The purpose of the revision is to amend an Administrative Order on Consent (AOC) between the department and Evergy Inc. regarding the Lake Road Generating Station in Buchanan County. The AOC amendment includes more protective fuel restrictions at Lake Road and streamlines Evergy’s reporting and recordkeeping requirements. These updates reflect the current actual operating conditions at Lake Road.

The department invites the public to review and offer written comments on the proposed revision until Dec. 9, 2021. **All comments must be received or postmarked by 5 p.m.** The public can review the proposed revisions below. Written comments may be submitted by mail to Air Quality Planning Section Chief, Missouri Department of Natural Resources, Air Pollution Control Program, PO Box 176, Jefferson City, MO 65102-0176 or by email to apcpsip@dnr.mo.gov.

The Missouri Air Conservation Commission will hold a public hearing about the proposed revision on Dec. 2, 2021. Please follow the hearing link for more information. If the commission adopts the proposed action, the department intends to submit the revisions to the U.S. Environmental Protection Agency to be included in Missouri’s SIP.

Event Documents

- [Evergy Inc. Proposed Missouri State Implementation Plan Revision, Nov. 1, 2021](#)

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

BEFORE THE MISSOURI AIR CONSERVATION COMMISSION

10 CSR 10-5.381 (amendment) Onboard Diagnostics Motor Vehicle
Emission Inspection

Missouri State Implementation Plan Revision - Everygy - Lake
Road Sulfur Dioxide Consent Agreement - 2021 Revision

Public Hearing

December 2, 2021
Elm Street Conference Center
1730 East Elm Street
Jefferson City, Missouri

Present on behalf of the Commission:

Richard Rocha - Chairman
Mark Fohey - Commissioner
Ron Boyer - Commissioner
Gary Pendergrass - Commissioner

THE COURT REPORTER:

Jenna Petree
ALARIS LITIGATION SERVICES
2511 Broadway Bluffs
Columbia, MO 65201
573-449-0561

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

P R O C E E D I N G S

CHAIRMAN ROCHA: The hearing will come to order. Let the record show the following commission members are present. Richard Rocha, Mark Fohey, Ron Boyer, and Gary Pendergrass. The Air Conservation Commission of the State of Missouri has called this public hearing pursuant to Section 643.050.1(2) in accordance with Section 643.070 Revised Statute of Missouri, and EPA Promulgated Rule 40 CFR 51.102 for the purpose of hearing testimony related to 10 CSR 10-5.381 (amendment) Onboard Diagnostics Motor Vehicle Emissions Inspection; Missouri State Implementation Plan Revision - Evergy - Lake Road Sulfur Dioxide Consent Agreement - 2021 Revision. The hearing record for this action will close at his action will close at 5:00 p.m. on Thursday, December 9, 2021.

We are presenting today's meeting in person and via WebEx. As such, for the December 2, 2021 meeting, Air Conservation Commission is accepting oral testimony by WebEx and in-person after a person is sworn in by the court reporter. First, I will call speakers that are scheduled to appear on the public hearing item. Anyone who has not been scheduled to appear, but wishes to be heard, should indicate that they wish to speak on the sign-in sheet available at the door. For those participating by telephone or WebEx, I will ask for additional speakers

1 CHAIRMAN ROCHA: Thank you. Is there anybody
2 on WebEx who wishes to make a statement? Is there anyone
3 on the telephone that wishes to speak? Okay. Thank you.
4 That concludes the first part of our public hearing.

5 Next up we have Francisco Cortalezzi who will
6 present on the second public hearing item, Missouri State
7 Implementation Plan Revision - Evergy - Lake Road Sulfur
8 Dioxide Consent Agreement - 2021 Revision. Francisco?

9 MR. CORTALEZZI: Mr. Chairman, members of the
10 commission, my name is Francisco Jose Cortalezzi. I am
11 employed in the State Implementation Plan Unit with the
12 Missouri Department of Natural Resources' Air Pollution
13 Control Program. I work at 1659 East Elm Street, Jefferson
14 City, Missouri. I am here today to present testimony on
15 the proposed Missouri State Implementation Plan or SIP
16 revision titled "Evergy - Lake Road Sulfur Dioxide Consent
17 Agreement - 2021 Revision."

18 The executive summary for the plan starts on
19 page 168 of the briefing document.

20 This proposed action amends an administrative
21 order on consent, or AOC, that is currently included in
22 Missouri's SIP. The parties to the AOC are the Air Program
23 and Evergy, Incorporated. The AOC includes enforceable
24 requirements to control sulfur dioxide, or SO2 emissions,
25 at Lake Road Generating Station in Buchanan County.

1 The original need for the SO2 requirements at
2 Lake Road was to support an attainment demonstration
3 developed in the year 2000. This was accomplished through
4 a Consent Decree between the Air Program and the former
5 owner of Lake Road that EPA approved into Missouri's SIP.
6 In 2019, the Commission adopted a SIP revision where an
7 updated AOC for Lake Road replaced the requirements in the
8 original Consent Decree.

9 Through this proposed action today, we are
10 replacing the current version of the AOC in Missouri's SIP
11 with the latest amendment. The parties executed this
12 latest amendment to the AOC in October of 2021. The
13 amendment updates the enforceable requirements to reflect
14 the current actual operating conditions at Lake Road. This
15 includes new fuel restrictions and the retirement of one of
16 the boilers at the facility. The amendment also
17 streamlines the necessary reporting requirements at Lake
18 Road as a result of the updated fuel restrictions.

19 If the commission adopts this plan, the
20 Department intends to submit it to the U.S. Environmental
21 Protection Agency for inclusion in the Missouri State
22 Implementation Plan.

23 Chairman, commissioners, that concludes my
24 testimony. If there are any questions, I will be happy to
25 answer them at this time.

RECOMMENDATION FOR ADOPTION

MISSOURI STATE IMPLEMENTATION PLAN REVISION –

EVERGY – LAKE ROAD SULFUR DIOXIDE CONSENT AGREEMENT

2021 REVISION

On December 2, 2021, the Missouri Air Conservation Commission held a public hearing for the Missouri State Implementation Plan revision titled – *Evergy – Lake Road Sulfur Dioxide Consent Agreement – 2021 Revision*

The public comment period for the proposed plan opened on November 1, 2021, and closed on December 9, 2021, The Missouri Department of Natural Resources’ Air Pollution Control Program (Air Program) did not receive any comments on the proposed plan. Therefore, the Air Program did not make any changes to the proposed plan as a result of comments.

The Air Program has not reprinted the proposed plan in the briefing document due to its volume. However, the Executive Summary is included for reference. The entire plan is available for review at the Missouri Department of Natural Resources’ Air Pollution Control Program, 1659 East Elm Street, Jefferson City, Missouri, 65101, (573)751-4817. It is also available online at <https://dnr.mo.gov/document-search/state-implementation-plan-revision-evergy-lake-road-sulfur-dioxide-consent-agreement-january-27-2022>.

The Air Program recommends the commission adopt the plan as proposed. If the commission adopts this plan, the Air Program intends to submit it to the U.S. Environmental Protection Agency for inclusion in the Missouri State Implementation Plan.

Executive Summary

The purpose of this plan is to incorporate Amendment #2 of the Administrative Order on Consent (AOC) No. APCP-2015-118 into Missouri's State Implementation Plan (SIP). The parties to the AOC are the Missouri Department of Natural Resources' Air Pollution Control Program (Air Program) and Evergy, Inc. (Evergy). The AOC includes enforceable requirements to control sulfur dioxide (SO₂) emissions at the Lake Road Generating Station (Lake Road).

In 2000, the Air Program issued a Consent Decree to the company that owned Lake Road at the time, St. Joseph Light & Power Company. The purpose of the 2000 Consent Decree was to support a 2001 attainment demonstration for SO₂ concentrations in the area surrounding Lake Road. EPA approved the 2000 Consent Decree and 2001 attainment demonstration into Missouri's SIP in November of 2001.

Since then, Lake Road has implemented several changes that have reduced SO₂ emissions and resulted in improved air quality in the area surrounding the facility. In addition, Lake Road changed ownership from St. Joseph Light & Power Company to Kansas City Power and Light (KCP&L). The Air Program incorporated many of these changes into an AOC that was issued to KCP&L in 2016 (2016 AOC) and subsequently amended in 2018 (Amendment #1). The Air Program also developed a 2018 attainment demonstration for Lake Road to replace the 2001 attainment demonstration. EPA approved the 2016 AOC, Amendment #1 and the 2018 attainment demonstration in August of 2019.

The Air Program is updating the enforceable requirements to reflect the current actual operating conditions at Lake Road, which is now owned by Evergy. This includes new fuel restrictions and the retirement of one of the boilers at the facility. Amendment #2 consolidates the necessary requirements into a single document and streamlines the necessary reporting requirements at Lake Road as a result of the updated fuel restrictions. Upon EPA approval, this plan will fully replace the 2018 attainment demonstration, the 2016 AOC, and Amendment #1 in Missouri's SIP.