City of Memphis

125 W. Jefferson
Memphis, MO 63555

Phone: 660-465-7285
Fax: 660-465-7342
Email: memcity@superiorcable.net

VIA CERTIFIED MAIL
(Return Receipt Requested)

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REC'D

AUG 16 2010

APCO

August 5, 2010

Ms. Rebecca Webber
Director, Air and Waste Management Division
U.S. Environmental Protection Agency
901 N. 5th Street, Kansas City, KS 66101

Mr. James Kavanaugh, Director
Air Pollution Control Program
Missouri Department of Natural Resources
PO Box 176
Jefferson City, MO 65102

RE: NESHAP Initial Notification
City of Memphis Power Plant
County Number: 199
Plant Number: 0020
NAICS Code: 221112

Dear Ms. Webber and Mr. Kavanaugh:

On March 3, 2010, the United States Environmental Protection Agency adopted final amendments to the National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines, 40 C.F.R. Part 63 Subpart ZZZZ. These amendments were effective on May 3, 2010. Pursuant to Section 63.6645(a) and Section 63.9(b), City of Memphis submits the following information as its Initial Notification:

1. Name and address of the owner/operator:
   City of Memphis
   125 W. Jefferson St.
   Memphis, MO 63555
   (660)-465-2003

2. Address of the affected source (*i.e.* the physical location of the engine(s) subject to Subpart ZZZZ):
   737 W. Strong Blvd.
   Memphis, MO 63555

3. Identification of the relevant standard and compliance date: Subpart ZZZZ standards for existing RICE at area sources and May 3, 2013.

4. Description of the affected source:

Engine #1:	Fairbanks Morse	38DD8-1/8	960 HP
Engine #2:	EMD	16-567B	1440 HP
Engine #4:	EMD	16-567B	1440 HP
Engine #5:	Fairbanks Morse	38D8-1/8	700 HP
Engine #6:	Fairbanks Morse	38D8-1/8	1280 HP
Engine #7:	Fairbanks Morse	38E8-1/8	1600 HP
Engine #8:	Fairbanks Morse	38DD8-1/8	1920 HP
Engine #9:	Fairbanks Morse	38DD8-1/8	1920 HP
Engine #10:	EMD	16-567B	1440 HP

5. Types of HAPs emitted by affected source: Benzene, toluene, xylenes, 1,3-butadiene, formaldehyde, acetaldehyde, acrolein, some polycyclic aromatic hydrocarbons and other trace organic compounds.

6. Major or Area Source: Area.

City of Memphis also operates RICE at the facility that are exclusively used for emergencies. These RICE are not required to be included in the Initial Notification pursuant to 40 C.F.R. § 63.6645(a)(5).

City of Memphis also operates existing non-emergency stationary CI RICE less than or equal to 300 hp that are not subject to any numerical emission standards. These RICE are not required to be included in the Initial Notification pursuant to 40 C.F.R. § 63.6645(a)(5).

If you have any questions regarding the above, please do not hesitate to contact

Verbal Blakey
Consulting Engineer
BHMG Engineers, Inc.
630 Jeffco Blvd
Arnold, MO 63010
(636) 296-8600

Sincerely,
City of Memphis

Honorable William Reckenberg, Mayor

pc: BHMG Engineers, Inc.