

MISSOURI
DEPARTMENT OF
NATURAL RESOURCES

PART 70 PERMIT TO OPERATE

Under the authority of RSMo 643 and the Federal Clean Air Act the applicant is authorized to operate the air contaminant source(s) described below, in accordance with the laws, rules, and conditions set forth herein.

Operating Permit Number: OP2017-020

Expiration Date: MAR 22 2022

Installation ID: 123-0018

Project Number: 2015-03-064

Installation Name and Address

Twelve Mile Compressor Station
2330 Madison 417
Fredericktown, MO 63645
Madison County

Parent Company's Name and Address

Enable Mississippi River Transmission,
LLC
PO Box 24300, M/C LS700
Oklahoma City OK, 73124-0300

Installation Description:

This installation is a natural gas compressor station. Natural gas enters the station where it is compressed and then it exits the station at a higher pressure. The installation consists of five 1,100-hp compressor engines; one 1,000-hp compressor engine, one 300-hp generator engine; one 22.5-hp generator engine; and storage tanks ranging from 1,000 to 11,900 gallons. All engines are natural gas fired units. The installation has the potential to emit oxides of nitrogen (NO_x) and carbon monoxide (CO) above the major source thresholds.

Prepared by
Kasia Wasescha
Operating Permit Unit

Director or Designee
Department of Natural Resources

MAR 22 2017

Effective Date

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I. Installation Equipment Listing

EMISSION UNITS WITH LIMITATIONS

The following list provides a description of the equipment at this installation that emits air pollutants and that are identified as having unit-specific limitations.

EQ ID	Name	Description
EP-01	CP1551	1,100-hp Ingersoll Rand IR-103 KVG Compressor Engine
EP-02	CP1552	1,100-hp Ingersoll Rand IR-103 KVG Compressor Engine
EP-03	CP1553	1,100-hp Ingersoll Rand IR-103 KVG Compressor Engine
EP-04	CP1554	1,100-hp Ingersoll Rand IR-103 KVG Compressor Engine
EP-05	CP1555	1,100-hp Ingersoll Rand IR-103 KVG Compressor Engine
EP-06	CP1556	1,000-hp Ingersoll Rand IR-103 KVG Compressor Engine
EP-09	GN1558	300-hp Caterpillar G379 Standby Generator Engine
EP-10	GN-TWR	22.5-hp Kohler 10RM62 Emergency Generator

EMISSION UNITS WITHOUT SPECIFIC LIMITATIONS

The following list provides a description of the equipment that does not have unit specific limitations at the time of permit issuance.

EQ ID	Name	Description
EP-07	VENT	Purge Vent
	TANK T1	11,900 Gallons Engine Oil Storage Tank
	TANK T2	1,500 Gallons NORKOOL (antifreeze) Storage Tank
	TANK T3	1,120 Gallons Condensate Storage Tank
	TANK T4	8,110 Gallons Waste Oil Storage Tank
	TANK T5	8,000 Gallons Methanol Storage Tank
	TANK T10	1,000 Gallon Separator/Oil Storage Tank
	TANK T11	1,000 Gallon Mercaptan Storage Tanks
	TANK T12	1,000 Gallon Mercaptan Storage Tanks
	TANK T13	1,000 Gallon Mercaptan Storage Tanks
	TANK T14	1,000 Gallon Mercaptan Storage Tanks
	HEATER 1	0.14 MMBtu/hr Space Heater (Natural Gas)
	HEATER 2	0.14 MMBtu/hr Space Heater (Natural Gas)
	HEATER 3	0.16 MMBtu/hr Space Heater (Natural Gas)
FUG	FUG	Piping Component Fugitives
	LOAD	Truck Loading of VOLs

II. Plant Wide Limitations

The installation shall comply with each of the following limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued. The plant wide conditions apply to all emission units at this installation. All emission units are listed in Section I under Emission Units with Limitations and Emission Units without Limitations.

<p style="text-align: center;">PERMIT CONDITION PW001 10 CSR 10-6.065(6) Voluntary Limitation(s)</p>

Operational Limit:

The permittee shall exclusively combust pipeline-grade natural gas in all combustion equipment.

Reporting:

The permittee shall report any deviations from the requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V of this permit.

III. Emission Units with Limitations

The installation shall comply with each of the following limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued.

PERMIT CONDITION 001		
10 CSR 10-6.075 Maximum Achievable Control Technology Regulations 40 CFR Part 63, Subpart ZZZZ: National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines		
EIQ ID	Description	Model
EP-09	SI 4SRB Emergency Generator	300-hp Caterpillar G379; installed 1982
EP-10	SI 4SRB Emergency Generator	22.5-hp Kohler 10RM62; manufactured 1985

Operational Limitation:

1. The permittee shall comply with the following requirements¹: [§63.6603(a) and Table 2d to MACT ZZZZ]
 - a) Change oil and filter every 500 hours of operation or annually, whichever comes first²;
 - b) Inspect spark plugs every 1,000 hours of operation or annually, whichever comes first; and
 - c) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

General Compliance Requirements:

1. The permittee must be in compliance with the operating limitations in this permit condition at all times. [§63.6605(a)]
2. The permittee shall operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require the permittee to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. [§63.6605(b)]
3. The permittee shall install a non-resettable hour meter if one is not already installed. [§63.6625(f)]

¹ If an emergency engine is operating during an emergency and it is not possible to shut down the engine in order to perform the management practice requirements on the schedule required in Table 2d of MACT ZZZZ, or if performing the management practice on the required schedule would otherwise pose an unacceptable risk under federal, state, or local law, the management practice can be delayed until the emergency is over or the unacceptable risk under federal, state, or local law has abated. The management practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under federal, state, or local law has abated. The permittee shall report any failure to perform the management practice on the schedule required and the federal, state or local law under which the risk was deemed unacceptable.

² Sources have the option to utilize an oil analysis program as described in §63.6625(j) in order to extend the specified oil change requirements in Table 2d of MACT ZZZZ.

Continuous Compliance Requirements:

1. The permittee must demonstrate continuous compliance with each operating limitation and other requirements in this condition according to the methods specified below: [§63.6640(a) and Table 6 to MACT ZZZZ]
 - a) Operate and maintain the stationary RICE according to the manufacturer's emission-related operation and maintenance instructions; or
 - b) The permittee may develop and follow their own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.
2. The permittee shall report each instance in which they did not meet the requirements in Table 8 to MACT ZZZZ that applies. [§63.6640(e)]
3. The emergency generator shall be operated according to the following requirements: [§63.6640(f)]
 - a) There is no time limit on the use of the emergency generator in emergency situations. [§63.6640(f)(1)]
 - b) The permittee may operate the emergency generator for any combination of the purposes specified in paragraphs (f)(2)(i) through (iii) for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by paragraphs (f)(3) and (4) of this section counts as part of the 100 hours per calendar year allowed by this paragraph. [§63.6640(f)(2)]
 - i) The emergency generator may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state, or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The permittee may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the permittee maintains records indicating that federal, state, or local standards require maintenance and testing of the emergency generator beyond 100 hours per calendar year. [§63.6640(f)(2)(i)]
 - ii) Emergency stationary RICE may be operated for emergency demand response for periods in which the Reliability Coordinator under the North American Electric Reliability Corporation (NERC) Reliability Standard EOP-002-3, Capacity and Energy Emergencies (incorporated by reference, see §63.14), or other authorized entity as determined by the Reliability Coordinator, has declared an Energy Emergency Alert Level 2 as defined in the NERC Reliability Standard EOP-002-3. [§63.6640(f)(2)(ii)]
 - iii) Emergency stationary RICE may be operated for periods where there is a deviation of voltage or frequency of 5 percent or greater below standard voltage or frequency. [§63.6640(f)(2)(iii)]
 - c) The emergency generator may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in paragraph (f)(2) of this section. The 50 hour per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity. [§63.6640(f)(4)]

Notifications:

The permittee shall submit required notifications as specified in §63.6645.

Recordkeeping:

1. The permittee shall maintain applicable records as specified in §63.6655 and §63.6660.
2. Records may be kept in either written or electronic form.
3. These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.

4. All records shall be retained for five years.

Reporting:

1. The permittee shall submit applicable reports as specified in §63.6650 to the Missouri Air Compliance Coordinator at EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219 and shall send copies to the Missouri Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102.
2. The permittee shall report any deviations from the standards, compliance provisions, performance testing, test methods, recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V of this permit.

PERMIT CONDITION 002		
10 CSR 10-6.075 Maximum Achievable Control Technology Regulations		
40 CFR Part 63, Subpart ZZZZ: National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines		
EIQ ID	Description	Model
EP-01	SI 4SRB non-emergency compressor engine (remote)	1,100-hp Ingersoll Rand IR-103 KVG; installed 1949
EP-02	SI 4SRB non-emergency compressor engine (remote)	1,100-hp Ingersoll Rand IR-103 KVG; installed 1949
EP-03	SI 4SRB non-emergency compressor engine (remote)	1,100-hp Ingersoll Rand IR-103 KVG; installed 1949
EP-04	SI 4SRB non-emergency compressor engine (remote)	1,100-hp Ingersoll Rand IR-103 KVG; installed 1949
EP-05	SI 4SRB non-emergency compressor engine (remote)	1,100-hp Ingersoll Rand IR-103 KVG; installed 1952
EP-06	SI 4SRB non-emergency compressor engine (remote)	1,000-hp Ingersoll Rand IR-103 KVG; installed 1977

Operational Limitation:

1. The permittee shall comply with the following requirements: [§63.6603(a) and Table 2d to MACT ZZZZ]
 - a) Change oil and filter every 2,160 hours of operation or annually, whichever comes first³;
 - b) Inspect spark plugs every 2,160 hours of operation or annually, whichever comes first; and
 - c) Inspect all hoses and belts every 2,160 hours of operation or annually, whichever comes first, and replace as necessary.

General Compliance Requirements:

1. The permittee must be in compliance with the emission limitations and operating limitations in 40 CFR Part 63 Subpart ZZZZ at all times. [§63.6605(a)]
2. The permittee shall operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require making any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available

³ Sources have the option to utilize an oil analysis program as described in §63.6625(j) in order to extend the specified oil change requirements in Table 2d of MACT ZZZZ.

to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. [§63.6605(b)]

Continuous Compliance Requirements:

1. The permittee must demonstrate continuous compliance with each operating limitation and other requirements in this condition according to the methods specified below: [§63.6640(a) and Table 6 to MACT ZZZZ]
 - a) Operate and maintain the stationary RICE according to the manufacturer's emission-related operation and maintenance instructions; or
 - b) The permittee may develop and follow their own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.
2. The permittee shall report each instance in which they did not meet the requirements in Table 8 to MACT ZZZZ that applies. [§63.6640(e)]

Notifications:

The permittee shall submit required notifications as specified in §63.6645.

Recordkeeping:

1. The permittee shall maintain applicable records as specified in §63.6655 and §63.6660.
2. Records may be kept in either written or electronic form.
3. These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
4. All records shall be retained for five years.

Reporting:

1. The permittee shall submit applicable reports as specified in §63.6650 to the Missouri Air Compliance Coordinator at EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219 and shall send copies to the Missouri Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102.
2. The permittee shall report any deviations from the standards, compliance provisions, performance testing, test methods, recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V of this permit.

IV. Core Permit Requirements

The installation shall comply with each of the following regulations or codes. Consult the appropriate sections in the Code of Federal Regulations (CFR), the Code of State Regulations (CSR), and local ordinances for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued. The following are only excerpts from the regulation or code, and are provided for summary purposes only.

10 CSR 10-6.045 Open Burning Requirements

- 1) General Provisions. The open burning of tires, petroleum-based products, asbestos containing materials, and trade waste is prohibited, except as allowed below. Nothing in this rule may be construed as to allow open burning which causes or constitutes a public health hazard, nuisance, a hazard to vehicular or air traffic, nor which violates any other rule or statute.
- 2) Certain types of materials may be open burned provided an open burning permit is obtained from the director. The permit will specify the conditions and provisions of all open burning. The permit may be revoked if the owner or operator fails to comply with the conditions or any provisions of the permit.

10 CSR 10-6.050 Start-up, Shutdown and Malfunction Conditions

- 1) In the event of a malfunction, which results in excess emissions that exceed one hour, the permittee shall submit to the director within two business days, in writing, the following information:
 - a) Name and location of installation;
 - b) Name and telephone number of person responsible for the installation;
 - c) Name of the person who first discovered the malfunction and precise time and date that the malfunction was discovered.
 - d) Identity of the equipment causing the excess emissions;
 - e) Time and duration of the period of excess emissions;
 - f) Cause of the excess emissions;
 - g) Air pollutants involved;
 - h) Estimate of the magnitude of the excess emissions expressed in the units of the applicable requirement and the operating data and calculations used in estimating the magnitude;
 - i) Measures taken to mitigate the extent and duration of the excess emissions; and
 - j) Measures taken to remedy the situation that caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations.
- 2) The permittee shall submit the paragraph 1 information to the director in writing at least ten days prior to any maintenance, start-up or shutdown activity which is expected to cause an excessive release of emissions that exceed one hour. If notice of the event cannot be given ten days prior to the planned occurrence, notice shall be given as soon as practicable prior to the activity.
- 3) Upon receipt of a notice of excess emissions issued by an agency holding a certificate of authority under section 643.140, RSMo, the permittee may provide information showing that the excess emissions were the consequence of a malfunction, start-up or shutdown. The information, at a minimum, should be the paragraph 1 list and shall be submitted not later than 15 days after receipt of the notice of excess emissions. Based upon information submitted by the permittee or any other pertinent information available, the director or the commission shall make a determination whether the excess emissions constitute a malfunction, start-up or shutdown and whether the nature, extent and duration of the excess emissions warrant enforcement action under section 643.080 or 643.151, RSMo.
- 4) Nothing in this rule shall be construed to limit the authority of the director or commission to take appropriate action, under sections 643.080, 643.090 and 643.151, RSMo to enforce the provisions of the Air Conservation Law and the corresponding rule.

- 5) Compliance with this rule does not automatically absolve the permittee of liability for the excess emissions reported.

10 CSR 10-6.060 Construction Permits Required

The permittee shall not commence construction, modification, or major modification of any installation subject to this rule, begin operation after that construction, modification, or major modification, or begin operation of any installation which has been shut down longer than five years without first obtaining a permit from the permitting authority.

10 CSR 10-6.065 Operating Permits

The permittee shall file a complete application for renewal of this operating permit at least six months before the date of permit expiration. In no event shall this time be greater than eighteen months. The permittee shall retain the most current operating permit issued to this installation on-site. The permittee shall immediately make such permit available to any Missouri Department of Natural Resources personnel upon request.

10 CSR 10-6.110 Reporting of Emission Data, Emission Fees and Process Information

- 1) The permittee shall submit a Full Emissions Report either electronically via MoEIS, which requires Form 1.0 signed by an authorized company representative, or on Emission Inventory Questionnaire (EIQ) paper forms on the frequency specified in this rule and in accordance with the requirements outlined in this rule. Alternate methods of reporting the emissions, such as spreadsheet file, can be submitted for approval by the director.
- 2) Public Availability of Emission Data and Process Information. Any information obtained pursuant to the rule(s) of the Missouri Air Conservation Commission that would not be entitled to confidential treatment under 10 CSR 10-6.210 shall be made available to any member of the public upon request.
- 3) The permittee shall pay an annual emission fee per ton of regulated air pollutant emitted according to the schedule in the rule. This fee is an emission fee assessed under authority of RSMo. 643.079.

10 CSR 10-6.130 Controlling Emissions During Episodes of High Air Pollution Potential

This rule specifies the conditions that establish an air pollution alert (yellow/orange/red/purple), or emergency (maroon) and the associated procedures and emission reduction objectives for dealing with each. The permittee shall submit an appropriate emergency plan if required by the Director.

10 CSR 10-6.150 Circumvention

The permittee shall not cause or permit the installation or use of any device or any other means which, without resulting in reduction in the total amount of air contaminant emitted, conceals or dilutes an emission or air contaminant which violates a rule of the Missouri Air Conservation Commission.

10 CSR 10-6.165 Restriction of Emission of Odors

This requirement is not federally enforceable.

No person may cause, permit or allow the emission of odorous matter in concentrations and frequencies or for durations that odor can be perceived when one volume of odorous air is diluted with seven volumes of odor-free air for two separate trials not less than 15 minutes apart within the period of one hour. This odor evaluation shall be taken at a location outside of the installation's property boundary.

10 CSR 10-6.170

Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin

Emission Limitation:

- 1) The permittee shall not cause or allow to occur any handling, transporting or storing of any material; construction, repair, cleaning or demolition of a building or its appurtenances; construction or use of a road, driveway or open area; or operation of a commercial or industrial installation without applying reasonable measures as may be required to prevent, or in a manner which allows or may allow, fugitive particulate matter emissions to go beyond the premises of origin in quantities that the particulate matter may be found on surfaces beyond the property line of origin. The nature or origin of the particulate matter shall be determined to a reasonable degree of certainty by a technique proven to be accurate and approved by the director.
- 2) The permittee shall not cause nor allow to occur any fugitive particulate matter emissions to remain visible in the ambient air beyond the property line of origin.
- 3) Should it be determined that noncompliance has occurred, the director may require reasonable control measures as may be necessary. These measures may include, but are not limited to, the following:
 - a) Revision of procedures involving construction, repair, cleaning and demolition of buildings and their appurtenances that produce particulate matter emissions;
 - b) Paving or frequent cleaning of roads, driveways and parking lots;
 - c) Application of dust-free surfaces;
 - d) Application of water; and
 - e) Planting and maintenance of vegetative ground cover.

10 CSR 10-6.180 Measurement of Emissions of Air Contaminants

- 1) The director may require any person responsible for the source of emission of air contaminants to make or have made tests to determine the quantity or nature, or both, of emission of air contaminants from the source. The director may specify testing methods to be used in accordance with good professional practice. The director may observe the testing. All tests shall be performed by qualified personnel.
- 2) The director may conduct tests of emissions of air contaminants from any source. Upon request of the director, the person responsible for the source to be tested shall provide necessary ports in stacks or ducts and other safe and proper sampling and testing facilities, exclusive of instruments and sensing devices as may be necessary for proper determination of the emission of air contaminants.
- 3) The director shall be given a copy of the test results in writing and signed by the person responsible for the tests.

10 CSR 10-6.280 Compliance Monitoring Usage

- 1) The permittee is not prohibited from using the following in addition to any specified compliance methods for the purpose of submission of compliance certificates:
 - a) Monitoring methods outlined in 40 CFR Part 64;
 - b) Monitoring method(s) approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
 - c) Any other monitoring methods approved by the director.
- 2) Any credible evidence may be used for the purpose of establishing whether a permittee has violated or is in violation of any such plan or other applicable requirement. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred at an installation:
 - a) Monitoring methods outlined in 40 CFR Part 64;
 - b) A monitoring method approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
 - c) Compliance test methods specified in the rule cited as the authority for the emission limitations.
- 3) The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
 - a) Applicable monitoring or testing methods, cited in:

- i) 10 CSR 10-6.030, "Sampling Methods for Air Pollution Sources";
 - ii) 10 CSR 10-6.040, "Reference Methods";
 - iii) 10 CSR 10-6.070, "New Source Performance Standards";
 - iv) 10 CSR 10-6.080, "Emission Standards for Hazardous Air Pollutants"; or
- b) Other testing, monitoring, or information gathering methods, if approved by the director, that produce information comparable to that produced by any method listed above.

40 CFR Part 82 Protection of Stratospheric Ozone (Title VI)

- 1) The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
 - a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to 40 CFR §82.106.
 - b) The placement of the required warning statement must comply with the requirements of 40 CFR §82.108.
 - c) The form of the label bearing the required warning statement must comply with the requirements of 40 CFR §82.110.
 - d) No person may modify, remove, or interfere with the required warning statement except as described in 40 CFR §82.112.
- 2) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B of 40 CFR Part 82:
 - a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices described in 40 CFR §82.156.
 - b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment described in 40 CFR §82.158.
 - c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR §82.161.
 - d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with the record keeping requirements of 40 CFR §82.166. ("MVAC-like" appliance as defined at 40 CFR §82.152).
 - e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to 40 CFR §82.156.
 - f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR §82.166.
- 3) If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.
- 4) If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements contained in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.
- 5) The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program. *Federal Only - 40 CFR Part 82.*

V. General Permit Requirements

The installation shall comply with each of the following requirements. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued,

10 CSR 10-6.065(6)(C)1.B Permit Duration

This permit is issued for a term of five years, commencing on the date of issuance. This permit will expire at the end of this period unless renewed.

10 CSR 10-6.065(6)(C)1.C General Record Keeping and Reporting Requirements

- 1) Record Keeping
 - a) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
 - b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any Missouri Department of Natural Resources' personnel upon request.
- 2) Reporting
 - a) All reports shall be submitted to the Air Pollution Control Program, Compliance and Enforcement Section, P. O. Box 176, Jefferson City, MO 65102.
 - b) The permittee shall submit a report of all required monitoring by:
 - i) October 1st for monitoring which covers the January through June time period, and
 - ii) April 1st for monitoring which covers the July through December time period.
 - c) Each report shall identify any deviations from emission limitations, monitoring, record keeping, reporting, or any other requirements of the permit, this includes deviations or Part 64 exceedances.
 - d) Submit supplemental reports as required or as needed. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
 - i) Notice of any deviation resulting from an emergency (or upset) condition as defined in paragraph (6)(C)7.A of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two working days after the date on which the emission limitation is exceeded due to the emergency, if the permittee wishes to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and the permittee can identify the cause(s) of the emergency. The permitted installation must show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or requirements in the permit. The notice must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.
 - ii) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.
 - iii) Any other deviations identified in the permit as requiring more frequent reporting than the permittee's semiannual report shall be reported on the schedule specified in this permit, and no later than ten days after any exceedance of any applicable rule, regulation, or other restriction.
 - e) Every report submitted shall be certified by the responsible official, except that, if a report of a deviation must be submitted within ten days after the deviation, the report may be submitted without a certification if the report is resubmitted with an appropriate certification within ten days after that, together with any corrected or supplemental information required concerning the deviation.

- f) The permittee may request confidential treatment of information submitted in any report of deviation.

10 CSR 10-6.065(6)(C)1.D Risk Management Plan Under Section 112(r)

If the installation is required to develop and register a risk management plan pursuant to Section 112(R) of the Act, the permittee will verify that it has complied with the requirement to register the plan.

10 CSR 10-6.065(6)(C)1.F Severability Clause

In the event of a successful challenge to any part of this permit, all uncontested permit conditions shall continue to be in force. All terms and conditions of this permit remain in effect pending any administrative or judicial challenge to any portion of the permit. If any provision of this permit is invalidated, the permittee shall comply with all other provisions of the permit.

10 CSR 10-6.065(6)(C)1.G General Requirements

- 1) The permittee must comply with all of the terms and conditions of this permit. Any noncompliance with a permit condition constitutes a violation and is grounds for enforcement action, permit termination, permit revocation and re-issuance, permit modification or denial of a permit renewal application.
- 2) The permittee may not use as a defense in an enforcement action that it would have been necessary for the permittee to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit
- 3) The permit may be modified, revoked, reopened, reissued or terminated for cause. Except as provided for minor permit modifications, the filing of an application or request for a permit modification, revocation and reissuance, or termination, or the filing of a notification of planned changes or anticipated noncompliance, does not stay any permit condition.
- 4) This permit does not convey any property rights of any sort, nor grant any exclusive privilege.
- 5) The permittee shall furnish to the Air Pollution Control Program, upon receipt of a written request and within a reasonable time, any information that the Air Pollution Control Program reasonably may require to determine whether cause exists for modifying, reopening, reissuing or revoking the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the Air Pollution Control Program copies of records required to be kept by the permittee. The permittee may make a claim of confidentiality for any information or records submitted pursuant to 10 CSR 10-6.065(6)(C)1.

10 CSR 10-6.065(6)(C)1.H Incentive Programs Not Requiring Permit Revisions

No permit revision will be required for any installation changes made under any approved economic incentive, marketable permit, emissions trading, or other similar programs or processes provided for in this permit.

10 CSR 10-6.065(6)(C)1.I Reasonably Anticipated Operating Scenarios

None.

10 CSR 10-6.065(6)(C)3 Compliance Requirements

- 1) Any document (including reports) required to be submitted under this permit shall contain a certification signed by the responsible official.
- 2) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized officials of the Missouri Department of Natural Resources, or their authorized agents, to perform the following (subject to the installation's right to seek confidential treatment of information submitted to, or obtained by, the Air Pollution Control Program):
 - a) Enter upon the premises where a permitted installation is located or an emissions-related activity is conducted, or where records must be kept under the conditions of this permit;

- b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - c) Inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
 - d) As authorized by the Missouri Air Conservation Law, Chapter 643, RSMo or the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the terms of this permit, and all applicable requirements as outlined in this permit.
- 3) All progress reports required under an applicable schedule of compliance shall be submitted semiannually (or more frequently if specified in the applicable requirement). These progress reports shall contain the following:
- a) Dates for achieving the activities, milestones or compliance required in the schedule of compliance, and dates when these activities, milestones or compliance were achieved, and
 - b) An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measures adopted.
- 4) The permittee shall submit an annual certification that it is in compliance with all of the federally enforceable terms and conditions contained in this permit, including emissions limitations, standards, or work practices. These certifications shall be submitted annually by April 1st, unless the applicable requirement specifies more frequent submission. These certifications shall be submitted to EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, as well as the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and Part 64 exceedances and excursions must be included in the compliance certifications. The compliance certification shall include the following:
- a) The identification of each term or condition of the permit that is the basis of the certification;
 - b) The current compliance status, as shown by monitoring data and other information reasonably available to the installation;
 - c) Whether compliance was continuous or intermittent;
 - d) The method(s) used for determining the compliance status of the installation, both currently and over the reporting period; and
 - e) Such other facts as the Air Pollution Control Program will require in order to determine the compliance status of this installation.

10 CSR 10-6.065(6)(C)6 Permit Shield

- 1) Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements as of the date that this permit is issued, provided that:
 - a) The applicable requirements are included and specifically identified in this permit, or
 - b) The permitting authority, in acting on the permit revision or permit application, determines in writing that other requirements, as specifically identified in the permit, are not applicable to the installation, and this permit expressly includes that determination or a concise summary of it.
- 2) Be aware that there are exceptions to this permit protection. The permit shield does not affect the following:
 - a) The provisions of section 303 of the Act or section 643.090, RSMo concerning emergency orders,
 - b) Liability for any violation of an applicable requirement which occurred prior to, or was existing at, the time of permit issuance,
 - c) The applicable requirements of the acid rain program,
 - d) The authority of the Environmental Protection Agency and the Air Pollution Control Program of the Missouri Department of Natural Resources to obtain information, or
 - e) Any other permit or extra-permit provisions, terms or conditions expressly excluded from the permit shield provisions.

10 CSR 10-6.065(6)(C)7 Emergency Provisions

- 1) An emergency or upset as defined in 10 CSR 10-6.065(6)(C)7.A shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emissions limitations. To establish an emergency- or upset-based defense, the permittee must demonstrate, through properly signed, contemporaneous operating logs or other relevant evidence, the following:
 - a) That an emergency or upset occurred and that the permittee can identify the source of the emergency or upset,
 - b) That the installation was being operated properly,
 - c) That the permittee took all reasonable steps to minimize emissions that exceeded technology-based emissions limitations or requirements in this permit, and
 - d) That the permittee submitted notice of the emergency to the Air Pollution Control Program within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.
- 2) Be aware that an emergency or upset shall not include noncompliance caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

10 CSR 10-6.065(6)(C)8 Operational Flexibility

An installation that has been issued a Part 70 operating permit is not required to apply for or obtain a permit revision in order to make any of the changes to the permitted installation described below if the changes are not Title I modifications, the changes do not cause emissions to exceed emissions allowable under the permit, and the changes do not result in the emission of any air contaminant not previously emitted. The permittee shall notify the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, at least seven days in advance of these changes, except as allowed for emergency or upset conditions. Emissions allowable under the permit means a federally enforceable permit term or condition determined at issuance to be required by an applicable requirement that establishes an emissions limit (including a work practice standard) or a federally enforceable emissions cap that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject.

- 1) Section 502(b)(10) changes. Changes that, under section 502(b)(10) of the Act, contravene an express permit term may be made without a permit revision, except for changes that would violate applicable requirements of the Act or contravene federally enforceable monitoring (including test methods), record keeping, reporting or compliance requirements of the permit.
 - a) Before making a change under this provision, The permittee shall provide advance written notice to the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, describing the changes to be made, the date on which the change will occur, and any changes in emission and any permit terms and conditions that are affected. The permittee shall maintain a copy of the notice with the permit, and the APCP shall place a copy with the permit in the public file. Written notice shall be provided to the EPA and the APCP as above at least seven days before the change is to be made. If less than seven days notice is provided because of a need to respond more quickly to these unanticipated conditions, the permittee shall provide notice to the EPA and the APCP as soon as possible after learning of the need to make the change.
 - b) The permit shield shall not apply to these changes.

10 CSR 10-6.065(6)(C)9 Off-Permit Changes

- 1) Except as noted below, the permittee may make any change in its permitted operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Insignificant activities listed in the permit, but not otherwise addressed in or prohibited by this permit, shall not be considered to be constrained by this permit for purposes of the off-permit provisions of this section. Off-permit changes shall be subject to the following requirements and restrictions:
 - a) The change must meet all applicable requirements of the Act and may not violate any existing permit term or condition; the permittee may not change a permitted installation without a permit revision if this change is subject to any requirements under Title IV of the Act or is a Title I modification;
 - b) The permittee must provide contemporaneous written notice of the change to the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219. This notice shall not be required for changes that are insignificant activities under 10 CSR 10-6.065(6)(B)3 of this rule. This written notice shall describe each change, including the date, any change in emissions, pollutants emitted and any applicable requirement that would apply as a result of the change.
 - c) The permittee shall keep a record describing all changes made at the installation that result in emissions of a regulated air pollutant subject to an applicable requirement and the emissions resulting from these changes; and
 - d) The permit shield shall not apply to these changes.

10 CSR 10-6.020(2)(R)34 Responsible Official

The application utilized in the preparation of this permit was signed by Frank J. Antoine, Jr. On September 30, 2015, the Air Pollution Control Program was informed that Paul M. Brewer is now the responsible official. If this person terminates employment, or is reassigned different duties such that a different person becomes the responsible person to represent and bind the installation in environmental permitting affairs, the owner or operator of this air contaminant source shall notify the Director of the Air Pollution Control Program of the change. Said notification shall be in writing and shall be submitted within 30 days of the change. The notification shall include the name and title of the new person assigned by the source owner or operator to represent and bind the installation in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible person that were used in the establishment of limiting permit conditions on this permit will continue to be binding on the installation until such time that a revision to this permit is obtained that would change said representations, agreements and covenants.

10 CSR 10-6.065(6)(E)6 Reopening-Permit for Cause

This permit may be reopened for cause if:

- 1) The Missouri Department of Natural Resources (MDNR) receives notice from the Environmental Protection Agency (EPA) that a petition for disapproval of a permit pursuant to 40 CFR § 70.8(d) has been granted, provided that the reopening may be stayed pending judicial review of that determination,
- 2) MDNR or EPA determines that the permit contains a material mistake or that inaccurate statements were made which resulted in establishing the emissions limitation standards or other terms of the permit,
- 3) Additional applicable requirements under the Act become applicable to the installation; however, reopening on this ground is not required if—:
 - a) The permit has a remaining term of less than three years;
 - b) The effective date of the requirement is later than the date on which the permit is due to expire; or
 - c) The additional applicable requirements are implemented in a general permit that is applicable to the installation and the installation receives authorization for coverage under that general permit,

- 4) The installation is an affected source under the acid rain program and additional requirements (including excess emissions requirements), become applicable to that source, provided that, upon approval by EPA, excess emissions offset plans shall be deemed to be incorporated into the permit; or
- 5) MDNR or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

10 CSR 10-6.065(6)(E)1.C Statement of Basis
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This permit is accompanied by a statement setting forth the legal and factual basis for the permit conditions (including references to applicable statutory or regulatory provisions). This Statement of Basis, while referenced by the permit, is not an actual part of the permit.

VI. Attachments

None.

STATEMENT OF BASIS

INSTALLATION DESCRIPTION

The installation is a natural gas compressor station. Natural gas enters the station where it is compressed and then it exits the station at a higher pressure. The installation consists of five 1,100-hp compressor engines; one 1,000-hp compressor; one 300-hp generator engine; one 22.5-hp generator engine; and storage tanks ranging from 1,000 to 11,900 gallons. All engines are natural gas fired units. The installation has the potential to emit oxides of nitrogen (NO_x) and carbon monoxide (CO) above the major source thresholds.

The installation has been identified under several different names in the recent past. It has been identified as: Mississippi River Transmission Corp – Twelve Mile Station, Centerpoint Energy Mississippi River Transmission Company – Twelve Mile Compressor Station, and presently Enable Mississippi River Transmission – Twelve Mile Compressor Station.

Updated Potential to Emit for the Installation

Pollutant	Potential to Emit (tons/yr) ⁴
PM ₁₀	4.61
PM _{2.5}	4.61
Sulfur Oxides (SO _x)	0.13
Nitrogen Oxides (NO _x)	1,072.88
Volatile Organic Compounds (VOC's)	25.28
Carbon Monoxide (CO)	649.54
Hazardous Air Pollutants (HAP's)	6.95
Acetaldehyde	0.58
Acrolein	0.55
Benzene	0.33
Formaldehyde	4.25
Methanol	0.63

⁴Each emission unit was evaluated at 8,760 hours of uncontrolled annual operation unless otherwise noted. The emergency generator was evaluated at 500 hours. The comfort space heaters were not included in the PTE calculation.

Reported Air Pollutant Emissions, tons per year

Pollutants	2015	2014	2013	2012	2011
Particulate Matter ≤ Ten Microns (PM ₁₀)	0.77	1.47	0.68	0.60	0.59
Particulate Matter ≤ 2.5 Microns (PM _{2.5})	0.77	1.47	0.68	0.60	0.59
Sulfur Oxides (SO _x)	0.02	0.04	0.04	0.04	0.03
Nitrogen Oxides (NO _x)	181.92	329.24	316.54	232.06	250.00
Volatile Organic Compounds (VOC)	1.90	19.12	18.91	20.03	20.00
Carbon Monoxide (CO)	109.41	197.37	190.96	142.45	153.64
Hazardous Air Pollutants ⁵ (HAPs)	0.70	1.13	1.13	0.81	0.88

Permit Reference Documents

These documents were relied upon in the preparation of the operating permit. Because they are not incorporated by reference, they are not an official part of the operating permit.

- 1) Part 70 Operating Permit Application, received March 27, 2015; revised September 30, 2015;
- 2) 2015 Emissions Inventory Questionnaire, received July 18, 2016; and
- 3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition.
- 4) Construction Permit #0792-040, issued July 28, 1992
- 5) Project 2012-07-038 – New Source Review Permit Applicability Letter

Applicable Requirements Included in the Operating Permit but Not in the Application or Previous Operating Permits

In the operating permit application, the installation indicated they were not subject to the following regulation(s). However, in the review of the application, the agency has determined that the installation is subject to the following regulation(s) for the reasons stated.

None.

Other Air Regulations Determined Not to Apply to the Operating Permit

The Air Pollution Control Program (APCP) has determined the following requirements to not be applicable to this installation at this time for the reasons stated.

10 CSR 10-6.100, *Alternate Emission Limits*

This rule is not applicable because the installation is in an ozone attainment area.

⁵ HAPs were calculated using the information provided in the EIQs.

10 CSR 10-6.220, *Restriction of Emission of Visible Air Contaminants*

This rule does not apply to internal combustion engines so the facility is exempt per 6.220(1)(A).

10 CSR 10-6.260, *Restriction of Emission of Sulfur Compounds*

10 CSR 10-6.261, *Control of Sulfur Dioxide Emissions*

These regulations do not apply to the engines because they use exclusively natural gas and are therefore exempt via 6.260(1)(A)(2) and 6.261(1)(A).

10 CSR 10-6.390, *Control of NO_x Emissions from Large Stationary Internal Combustion Engines*

This rule does not apply because none of the engines are greater than 1,300-hp, see 6.390(1).

10 CSR 10-6.400, *Restriction of Emission of Particulate Matter from Industrial Processes*

This regulation does not apply to the compressors at the installation because they do not meet the definition of process weight, which applies to solid fuels that produce particulate matter and excludes liquids and gases used solely for fuels and air introduced for purposes of combustion. The natural gas fueled equipment are excluded by this definition.

Construction Permit History

Construction Permit #0792-040, issued July 28, 1992

The special conditions from Construction Permit #0792-040 were removed according to the definition of an emergency engine in 40 CFR Part 63, Subpart ZZZZ: *National Emission Standards for Hazardous Air Pollutants for Source Categories* in §63.6640(f) which has no time limit on emergency operation. It was assumed the 7,000 hours limitation taken in the Construction Permit was originally to reduce PTE emissions but according to current PTE for emergency generators they are assumed to operate at 500 hours per year for the sake of calculations, meaning the limitation is presently meaningless.

Project 2010-12-027 – No Permit Required Letter, sent February 22, 2011

This project was for the addition of NSCRs to the compressor engines at the facility due to requirements in MACT ZZZZ. The subpart was amended in January 2013, which differentiated remote and non-remote facilities. In this amendment this facility fit under the definition of “remote” and thus no longer was required to have NSCRs installed. As a result, the NSCRs were not added to the facility.

Project 2012-07-038 – New Source Review Permit Applicability Letter

This project was for the determination of a permit need for existing emergency generators located at several different facilities for communication towers. The Ste. Genevieve emergency engine is described to be powered by propane. Consulting with the facility contact revealed this to be an error – the generator is instead powered by natural gas. It was also determined that the Twelve Mile emergency engine (EP-10) is identical to the Ste. Genevieve facility’s emergency engine.

New Source Performance Standards (NSPS) Applicability

40 CFR Part 60, Subpart K *Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978*

40 CFR Part 60, Subpart Ka *Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984*

40 CFR Part 60, Subpart Kb *Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984*

These regulations do not apply to the above ground storage tanks because the tanks have a capacity less than 19,813 gallons, as shown in the table below:

Tank ID	Capacity (gallons)	Contents
T1	11,900	Engine Oil
T2	1,500	NORKOOL
T3	1,120	Condensate
T4	8,110	Waste Oil
T5	8,000	NORKOOL
T10	1,000	Separator/Oil
T11	1,000	Mercaptan
T12	1,000	Mercaptan
T13	1,000	Mercaptan
T14	1,000	Mercaptan

40 CFR Part 60, Subpart JJJJ *Standards of Performance for Stationary Spark Ignition Internal Combustion Engines*

The engines were constructed before the applicability dates in this subpart so this subpart does not apply.

40 CFR Part 60, Subpart IIII *Standards of Performance for Stationary Compression Ignition Internal Combustion Engines*

The engines at this facility are all spark ignition so this subpart does not apply.

40 CFR Part 60, Subpart OOOO *Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution for which Construction, Modification or Reconstruction Commenced after August 23, 2011, and on or before September 18, 2015*

This facility was constructed before the applicability dates and has not been modified or reconstructed after the applicability dates, thus this subpart does not apply.

Maximum Achievable Control Technology (MACT) Applicability

40 CFR Part 63, Subpart DDDDD - *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters*

This subpart only applies to major sources of HAP and thus does not apply to this facility due to being an area source of HAPs.

40 CFR Part 63, Subpart HHH - *National Emission Standards for Hazardous Air Pollutants From Natural Gas Transmission and Storage Facilities*

This regulation only applies to major sources of HAPs. This installation is an area source, therefore this rule does not apply.

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

In the permit application and according to APCP records, there was no indication that any Missouri Air Conservation Law, Asbestos Abatement, 643.225 through 643.250; 10 CSR 10-6.080, Emission Standards for Hazardous Air Pollutants, Subpart M, National Standards for Asbestos; and 10 CSR 10-6.250, Asbestos Abatement Projects - Certification, Accreditation, and Business Exemption Requirements apply to this installation. The installation is subject to these regulations if they undertake any projects that deal with or involve any asbestos containing materials. None of the installation's operating projects underway at the time of this review deal with or involve asbestos containing material. Therefore, the above regulations were not cited in the operating permit. If the installation should undertake any construction or demolition projects in the future that deal with or involve any asbestos containing materials, the installation must follow all of the applicable requirements of the above rules related to that specific project.

Compliance Assurance Monitoring (CAM) Applicability

40 CFR Part 64, *Compliance Assurance Monitoring (CAM)*

The CAM rule applies to each pollutant specific emission unit that:

- Is subject to an emission limitation or standard, and
- Uses a control device to achieve compliance, and
- Has pre-control emissions that exceed or are equivalent to the major source threshold.

The facility is exempt from CAM because MACT ZZZZ was proposed after November 11, 1990 and is additionally not required to use NSCR because the engines are a remote source.

Other Regulatory Determinations

10 CSR 10-6.170, *Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin*

This regulation applies to fugitive particulate emissions, with the intent of restricting and preventing fugitive emissions from traveling off property. The significant emission units have inherently low particulate emissions and are not expected to violate this regulation during regular operation. Thus, the monitoring and recordkeeping of this regulation have been removed from the Core Requirements section.

Other Regulations Not Cited in the Operating Permit or the Above Statement of Basis

Any regulation which is not specifically listed in either the Operating Permit or in the above Statement of Basis does not appear, based on this review, to be an applicable requirement for this installation for one or more of the following reasons:

1. The specific pollutant regulated by that rule is not emitted by the installation;
2. The installation is not in the source category regulated by that rule;
3. The installation is not in the county or specific area that is regulated under the authority of that rule;
4. The installation does not contain the type of emission unit which is regulated by that rule;
5. The rule is only for administrative purposes.

Should a later determination conclude that the installation is subject to one or more of the regulations cited in this Statement of Basis or other regulations which were not cited, the installation shall determine and demonstrate, to the APCP's satisfaction, the installation's compliance with that regulation(s). If the

installation is not in compliance with a regulation which was not previously cited, the installation shall submit to the APCP a schedule for achieving compliance for that regulation(s).

Response to Public Comments

The draft Part 70 operating permit renewal for Enable Mississippi River Transmission – Twelve Mile Compressor Station was placed on public notice October 21, 2016 for a 30-day comment period. The public notice was published on the Department of Natural Resources' Air Pollution Control Program's web page at: <http://www.dnr.mo.gov/env/apcp/PermitPublicNotices.htm>. Comments were received from Robert Cheever of the EPA on October 28, 2016. The comments will be addressed within this Response to Public Comments document.

Public Comment #1:

Currently, MDNR relies on EPA for the compliance management of area HAP sources and therefore, the reporting requirements for both Permit Condition 001 and Permit Condition 002 are not as required by Section V of this operating permit. All compliance reports shall be submitted to the Missouri Air Compliance Coordinator at EPA Region 7 with MDNR receiving copies as necessary and reporting requirement 2) in Permit Condition 001 and Permit Condition 002 should be modified to reflect this operating scenario.

Missouri Air Pollution Control Program Response to Comment #1:

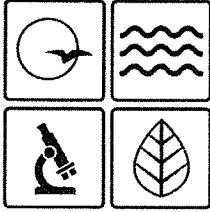
This change has been made. Requirements were modified in the reporting section of Permit Condition 001 and Permit Condition 002.

Public Comment #2:

The Twelve Mile Compressor Station in Fredericktown has been identified under several different names in the recent past. The facility has been identified as: Mississippi River Transmission Corp – Twelve Mile Compressor Station; CenterPoint Energy Mississippi River Transmission Company – Twelve Mile Compressor Station; and now Enable Mississippi River Transmission Twelve-Mile Compressor Station. Therefore, EPA recommends MDNR enhance the installation description in the operating permit Statement of Basis, to capture the facility ownership history. The continuity of site ownership is critical during operating permit preparation and review to ensure that all applicable requirements are included from previous construction permits and enforcement action settlements.

Missouri Air Pollution Control Program Response to Comment #2:

This change has been made in the Statement of Basis description.



Missouri Department of dnr.mo.gov

NATURAL RESOURCES

Eric R. Greitens, Governor

Carol S. Comer, Director

MAR 22 2017

Mr. Paul M Brewer
Twelve Mile Compressor Station
2330 Madison 417
Fredericktown, MO 63645

Re: Twelve Mile Compressor Station, 123-0018
Permit Number: OP2017-020

Dear Mr. Brewer,

Enclosed with this letter is your Part 70 operating permit. Please review this document carefully. Operation of your installation in accordance with the rules and regulations cited in this document is necessary for continued compliance. It is very important that you read and understand the requirements contained in your permit.

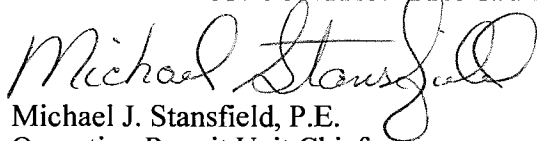
This permit may include requirements with which you may not be familiar. If you would like the department to meet with you to discuss how to understand and satisfy the requirements contained in this permit, an appointment referred to as a Compliance Assistance Visit (CAV) can be set up with you. To request a CAV, please contact your local regional office or fill out an online request. The regional office contact information can be found at <http://dnr.mo.gov/regions/>. The online CAV request can be found at <http://dnr.mo.gov/cav/compliance.htm>.

You may appeal this permit to the Administrative Hearing Commission (AHC), P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.078.16 and 621.250.3. If you choose to appeal, you must file a petition with the AHC within thirty days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If any such petition is sent by registered mail or certified mail, it will be deemed filed on the date it is mailed. If it is sent by any method other than registered mail or certified mail, it will be deemed filed on the date it is received by the AHC.

If you have any questions or need additional information regarding this permit, please contact the Air Pollution Control Program (APCP) at (573) 751-4817, or you may write to the Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102.

Sincerely,

AIR POLLUTION CONTROL PROGRAM


Michael J. Stansfield, P.E.
Operating Permit Unit Chief

MJS:kwj

Enclosures

c: PAMS File: 2015-03-064

