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: OR2016-026
Expiration Date: AUG 08 2021
Installation ID: 019-0077
Project Number: 2015-01-022

Installation Name and Address
Centralia Compressor Station
16151 N. Route Z
Centralia, MO 65240
Boone County

Installation Description:
The Centralia Compressor Station is a compressor station along a natural gas transmission pipeline. The installation operates two large stationary natural gas turbines, four natural gas reciprocating internal combustion engines, and various smaller emission sources. The installation is a major source of carbon monoxide, nitrogen oxides NOx, volatile organic compounds and hazardous air pollutants. The installation is subject to MACTs KKKK, ZZZZ, and DDDDD.

Prepared by
Bern Johnson
Operating Permit Unit

Parent Company's Name and Address
Panhandle Eastern Pipe Line Co.
7500 College Blvd, Suite 300
Overland Park KS, 66210

Director or Designee
Department of Natural Resources

AUG 08 2016
Effective Date
Table of Contents

I. **INSTALLATION DESCRIPTION AND EQUIPMENT LISTING ..............................................................3**
   INSTALLATION DESCRIPTION ...........................................................................................................3
   EMISSION UNITS WITH LIMITATIONS ...........................................................................................3
   EMISSION UNITS WITHOUT LIMITATIONS ......................................................................................4

II. **PLANT WIDE EMISSION LIMITATIONS.........................................................................................6**

III. **EMISSION UNIT SPECIFIC EMISSION LIMITATIONS .................................................................7**
   PERMIT CONDITION 1 ..........................................................................................................................7
   10 CSR 10-6.060 CONSTRUCTION PERMITS REQUIRED ...............................................................7
   CONSTRUCTION PERMIT NO. 102007-011, ISSUED OCTOBER 17, 2007 ..............................................7
   PERMIT CONDITION 2 ..........................................................................................................................8
   40 CFR PART 60, SUBPART KKKK – STANDARDS OF PERFORMANCE FOR STATIONARY COMBUSTION
   TURBINES ...........................................................................................................................................8
   PERMIT CONDITION 3 ..........................................................................................................................9
   10 CSR 10-6.075 MAXIMUM ACHIEVABLE CONTROL TECHNOLOGY REGULATIONS ....................9
   40 CFR PART 63, SUBPART ZZZZ—NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS
   FOR STATIONARY RECIPROCATING INTERNAL COMBUSTION ENGINES ............................................9
   PERMIT CONDITION 4 ..........................................................................................................................11
   10 CSR 10-6.075 MAXIMUM ACHIEVABLE CONTROL TECHNOLOGY REGULATIONS ....................11
   40 CFR PART 63, SUBPART DDDDD—NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS
   FOR MAJOR SOURCES: INDUSTRIAL, COMMERCIAL, AND INSTITUTIONAL BOILERS AND PROCESS HEATERS...11
   PERMIT CONDITION 5 ..........................................................................................................................12
   10 CSR 10-6.220 RESTRICTION OF EMISSION OF VISIBLE AIR CONTAMINANTS ............................12

IV. **CORE PERMIT REQUIREMENTS ..................................................................................................14**

V. **GENERAL PERMIT REQUIREMENTS .........................................................................................20**

VI. **ATTACHMENTS .........................................................................................................................26**
   ATTACHMENT A .....................................................................................................................................27
   Fugitive Emission Observations ...........................................................................................................27
   ATTACHMENT B .....................................................................................................................................28
   Opacity Emission Observations ............................................................................................................28
   ATTACHMENT C .....................................................................................................................................29
   Method 9 Opacity Emissions Observations ............................................................................................29
   ATTACHMENT D .....................................................................................................................................30
   Inspection/Maintenance/Repair/Malfunction Log ..................................................................................30
   ATTACHMENT E .....................................................................................................................................31
   Spark Ignition Reciprocating Internal Combustion Engine (RICE) Usage Log ........................................31
   APPENDIX A .........................................................................................................................................32
   Abbreviations and Acronyms ...............................................................................................................32
I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION
The Centralia Compressor Station is one of several Panhandle Eastern Pipe Line Company natural gas compressor stations along a natural gas transmission pipeline. The installation operates two stationary natural gas turbines, four natural gas reciprocating internal combustion engines, and various smaller emission sources. The installation is a major source of Carbon Monoxide (CO), Nitrogen Oxides (NOx), Volatile Organic Compounds (VOCs) and Hazardous Air Pollutants (HAPs). It is not a named source and fugitives are not counted toward potential-to-emit.

<table>
<thead>
<tr>
<th>Pollutants</th>
<th>2014</th>
<th>2013</th>
<th>2012</th>
<th>2011</th>
<th>2010</th>
</tr>
</thead>
<tbody>
<tr>
<td>Particulate Matter ≤ Ten Microns (PM10)</td>
<td>10.83</td>
<td>10.89</td>
<td>11.00</td>
<td>12.34</td>
<td>14.47</td>
</tr>
<tr>
<td>Particulate Matter ≤ 2.5 Microns (PM2.5)</td>
<td>10.83</td>
<td>10.89</td>
<td>11.00</td>
<td>12.34</td>
<td>14.47</td>
</tr>
<tr>
<td>Sulfur Oxides (SOx)</td>
<td>2.13</td>
<td>1.78</td>
<td>1.77</td>
<td>1.85</td>
<td>2.01</td>
</tr>
<tr>
<td>Nitrogen Oxides (NOx)</td>
<td>509.29</td>
<td>557.81</td>
<td>561.39</td>
<td>641.84</td>
<td>769.76</td>
</tr>
<tr>
<td>Volatile Organic Compounds (VOC)</td>
<td>40.64</td>
<td>40.98</td>
<td>41.27</td>
<td>45.64</td>
<td>51.55</td>
</tr>
<tr>
<td>Carbon Monoxide (CO)</td>
<td>136.34</td>
<td>135.48</td>
<td>134.43</td>
<td>151.43</td>
<td>172.74</td>
</tr>
<tr>
<td>Hazardous Air Pollutants (HAPs)</td>
<td>0.07</td>
<td>0.07</td>
<td>0.07</td>
<td>0.00</td>
<td>0.00</td>
</tr>
</tbody>
</table>

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 emission limitations.

<table>
<thead>
<tr>
<th>2014 EIQ Emission Point #</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP-919</td>
<td>10,310 hp (ISO) natural gas-fired stationary turbine – MHDR 83.73 mmBTU/hr</td>
</tr>
<tr>
<td>EP-920</td>
<td>10,310 hp (ISO) natural gas-fired stationary turbine – MHDR 83.73 mmBTU/hr</td>
</tr>
<tr>
<td>EP-927</td>
<td>637 hp natural gas emergency generator engine – MHDR 4.73 mmBTU/hr</td>
</tr>
<tr>
<td>EP-928</td>
<td>637 hp natural gas emergency generator engine – MHDR 4.73 mmBTU/hr</td>
</tr>
<tr>
<td>SH-1</td>
<td>natural gas fuel heater – MHDR 0.25 mmBTU/hr</td>
</tr>
<tr>
<td>SH-2</td>
<td>natural gas engine room heater – MHDR 1.0 mmBTU/hr</td>
</tr>
</tbody>
</table>
EMISSION UNITS WITHOUT LIMITATIONS
The following list provides a description of the equipment that does not have unit specific limitations at the time of permit issuance.

<table>
<thead>
<tr>
<th>2014 EIQ Emission Point #</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP-915</td>
<td>3,400 hp natural gas-fired reciprocating engine – MHDR 29.88 mmBTU/hr</td>
</tr>
<tr>
<td>EP-916</td>
<td>3,400 hp natural gas-fired reciprocating engine – MHDR 32.78 mmBTU/hr</td>
</tr>
<tr>
<td>EP-917</td>
<td>3,400 hp natural gas-fired reciprocating engine – MHDR 32.78 mmBTU/hr</td>
</tr>
<tr>
<td>EP-918</td>
<td>4,000 hp natural gas-fired reciprocating engine – MHDR 39.26 mmBTU/hr</td>
</tr>
<tr>
<td>BB</td>
<td>Bead Blaster Cabinet</td>
</tr>
<tr>
<td>Blowdown</td>
<td>Natural Gas Blowdown For Maintenance, Startups, Shutdowns</td>
</tr>
<tr>
<td>FUG</td>
<td>Fugitive Emissions From Component Leaks</td>
</tr>
<tr>
<td>PW2</td>
<td>Solvent Degreaser</td>
</tr>
<tr>
<td>T-08</td>
<td>7,464 Gallon Glycol/Water Storage Tank</td>
</tr>
<tr>
<td>T-09</td>
<td>1,964 Gallon Glycol/Water Storage Tank</td>
</tr>
<tr>
<td>T-10</td>
<td>10,000 Gallon Wastewater Storage Tank</td>
</tr>
<tr>
<td>T-11</td>
<td>2,700 Gallon Condensate Tank</td>
</tr>
<tr>
<td>T-12</td>
<td>3,000 Gallon Lube Oil Storage Tank</td>
</tr>
<tr>
<td>T-13</td>
<td>2,068 Gallon Lube Oil Storage Tank</td>
</tr>
<tr>
<td>T-14</td>
<td>6,400 Gallon Lube Oil Storage Tank</td>
</tr>
<tr>
<td>T-15</td>
<td>2,068 Gallon Glycol/Water Storage Tank</td>
</tr>
<tr>
<td>T-16</td>
<td>3,300 Gallon In-Ground Wastewater Storage Tank</td>
</tr>
<tr>
<td>T-17</td>
<td>3,300 Gallon In-Ground Wastewater Storage Tank</td>
</tr>
<tr>
<td>T-18</td>
<td>3,300 Gallon In-Ground Wastewater Storage Tank</td>
</tr>
<tr>
<td>2014 EIQ Emission Point #</td>
<td>Description</td>
</tr>
<tr>
<td>--------------------------</td>
<td>--------------------------------------------------</td>
</tr>
<tr>
<td>T-19</td>
<td>3,300 Gallon In-Ground Wastewater Storage Tank</td>
</tr>
<tr>
<td>T-20</td>
<td>3,000 Gallon In-Ground Wastewater Storage Tank</td>
</tr>
<tr>
<td>T-21</td>
<td>300 Gallon In-Ground Pipeline Liquids Tank</td>
</tr>
<tr>
<td>T-25</td>
<td>3,000 Gallon Wastewater Storage Tank</td>
</tr>
<tr>
<td>T-26</td>
<td>560 Gallon Wastewater Storage Tank</td>
</tr>
<tr>
<td>T-34</td>
<td>100 Gallon Diesel Tank (portable)</td>
</tr>
<tr>
<td>Truck</td>
<td>Condensate Truck Loading</td>
</tr>
</tbody>
</table>
II. Plant Wide Emission Limitations

The installation shall comply with each of the following emission 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 or Emission Units without Limitations.

None
III. Emission Unit Specific Emission Limitations

The installation shall comply with each of the following emission 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 1**

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP-919</td>
<td>10,310 hp (ISO) natural gas-fired stationary turbine – MHDR 83.73 mmBTU/hr</td>
</tr>
<tr>
<td>EP-920</td>
<td>10,310 hp (ISO) natural gas-fired stationary turbine – MHDR 83.73 mmBTU/hr</td>
</tr>
<tr>
<td>EP-927</td>
<td>637 hp natural gas emergency generator engine – MHDR 4.73 mmBTU/hr</td>
</tr>
<tr>
<td>EP-928</td>
<td>637 hp natural gas emergency generator engine – MHDR 4.73 mmBTU/hr</td>
</tr>
</tbody>
</table>

**Operational Limitations:**

1) The permittee shall use SoLoNO₅ to control emissions from EP-919 and -920. The SoLoNO₅ must be in use at all times when these turbines are in operation, except during the start-up or shutdown period and extreme ambient temperature (i.e., below 0°F), and shall be operated and maintained in accordance with the manufacturer’s specifications and recommendations. [Special Condition No. 2.A]

2) The permittee shall not operate any emergency generator (EP-927 or -928) for more than 500 hours annually. The generators shall be equipped with non-resettable meters to record the annual hours of operation for compliance. [Special Condition No. 5.A]

**Monitoring/Recordkeeping:**

1) The permittee shall maintain an operating and maintenance log using Attachment D or an equivalent form generated by the permittee for each SoLoNO₅ that shall include the following: [Special Condition No. 2.B]
   a) Incidents of malfunction: with impact on emissions, duration of event, probable cause and corrective actions.
   b) Maintenance activities: with inspection schedule, repair actions and replacements, etc.
   c) Records may be kept in either written or electronic form.

2) These records shall be made available immediately for inspection to the Department of Natural Resources’ personnel upon request.

3) All records must be maintained for five years.

**Reporting:**

The permittee shall report any deviations from the operational limitation, monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and annual compliance report required by Section V of this permit.
PERMIT CONDITION 2
10 CSR 10-6.070 New Source Performance Regulations
40 CFR Part 60, Subpart KKKK – Standards of Performance for Stationary Combustion Turbines

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP-919</td>
<td>10,310 hp (ISO) natural gas-fired stationary turbine</td>
</tr>
<tr>
<td>EP-920</td>
<td>10,310 hp (ISO) natural gas-fired stationary turbine</td>
</tr>
</tbody>
</table>

**Emissions Limitations:**
1) The permittee shall not combust within these stationary combustion turbines any fuel which contains total potential sulfur emissions in excess of 26 ng SO₂/J (0.060 lb SO₂/MMBtu) heat input. [§60.4330(a)(2)]
2) The permittee shall emit less than 25 ppm NOₓ at 15 percent O₂ or 150 ng NOₓ/J of useful output (1.2 lb/MWh). [§60.4320(a)]

**Operational Standards:**
The permittee must operate and maintain the stationary combustion turbines, air pollution control equipment, and monitoring equipment in a manner consistent with good air pollution control practices for minimizing emissions at all times including during startup, shutdown, and malfunction. [§60.4333(a)]

**Monitoring/Testing:**
1) The permittee must perform annual performance tests in accordance 2) below to demonstrate continuous compliance. If the NOₓ emission result from the performance test is less than or equal to 75% of the NOₓ emission limit for the turbine, the permittee may reduce the frequency of subsequent performance tests to once every 2 years (no more than 26 calendar months following the previous performance test). If the results of any subsequent performance test exceed 75% of the NOₓ emission limit for the turbine, the permittee must resume annual performance tests. [§60.4340(a)]
2) The performance test must be done at any load condition within plus or minus 25% of 100% of peak load. The permittee may perform testing at the highest achievable load point, if at least 75% of peak load cannot be achieved in practice. The permittee must conduct three separate test runs for each performance test. The minimum time per run is 20 minutes. [§60.4400(b)]
   a) Compliance with the emission limit must be demonstrated at each tested load level. Compliance is achieved if the three-run arithmetic average NOₓ emission rate at each tested level meets the emission limit. [§60.4400(b)(4)]
   b) The ambient temperature must be greater than 0 °F during the performance test. [§60.4400(b)(6)]

**Recordkeeping:**
1) The permittee must maintain the fuel quality characteristics in a current, valid tariff sheet specifying that the total sulfur content for the natural gas is 20 grains of sulfur or less per 100 standard cubic feet and has potential sulfur emissions of less than less than 26 ng SO₂/J (0.060 lb SO₂/MMBtu) heat input. [§60.4365(a)]
2) The permittee shall retain a copy of the most recent performance test.
3) The permittee shall maintain a maintenance log noting all inspections, malfunctions, and repairs using Attachment D or an equivalent form generated by the permittee.
4) These records shall be made available immediately for inspection to the Department of Natural Resources’ personnel upon request and must be maintained for five years.

**Reporting:**

1) The permittee shall report to the Air Pollution Control Program’s Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the end of the month during which the permittee determines that the emission unit exceeded the emission limitation listed above.

2) For each affected unit that performs annual performance tests, the permittee must submit a written report of the results of each performance test before the close of business on the 60th day following the completion of the performance test. [§60.4375(b)]

3) The permittee shall report any deviations from the standards, operational standards, monitoring/testing, recordkeeping, and reporting requirements of this permit condition in the semiannual monitoring report and annual compliance certification required by Section V of this permit.

**PERMIT CONDITION 3**

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP-927</td>
<td>637 hp 4-stroke lean burn spark ignition emergency generator</td>
</tr>
<tr>
<td>EP-928</td>
<td>637 hp 4-stroke lean burn spark ignition emergency generator</td>
</tr>
<tr>
<td>COMM-1</td>
<td>20 hp natural gas emergency generator – communication tower – MHDR 0.3 mmBTU/hr</td>
</tr>
</tbody>
</table>

**Operational Standards:**

1) The permittee shall operate the emergency stationary RICE according to the requirements in a) through c) below. In order for the engine to be considered an emergency stationary RICE under Subpart ZZZZ, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year is prohibited. [§63.6640(f)]

   a) There is no time limit on the use of emergency stationary RICE in emergency situations. [§63.6640(f)(1)]

   b) The permittee may operate the emergency stationary RICE for the purpose specified below for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by c) below count as part of the 100 hours per calendar year allowed. [§63.6640(f)(2)]

   i.) Emergency stationary RICE 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 emergency RICE beyond 100 hours per calendar year. [§63.6640(f)(2)(i)]

   c) Emergency stationary RICE located at area sources of HAP 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. Except as provided in i) below, the 50 hours 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 an electric grid or otherwise supply power as part of a financial arrangement with another entity. [§63.6640(f)(4)]

i.) The 50 hours per year for non-emergency situations can be used to supply power as part of a financial arrangement with another entity if all of the following conditions are met: [§63.6640(f)(4)(ii)(A) though (E)]

A.) The engine is dispatched by the local balancing authority or local transmission and distribution system operator.

B.) The dispatch is intended to mitigate local transmission and/or distribution limitations so as to avert potential voltage collapse or line overloads that could lead to the interruption of power supply in a local area or region.

C.) The dispatch follows reliability, emergency operation or similar protocols that follow specific NERC, regional, state, public utility commission or local standards or guidelines.

D.) The power is provided only to the facility itself or to support the local transmission and distribution system.

E.) The permittee identifies and records the entity that dispatches the engine and the specific NERC, regional, state, public utility commission or local standards or guidelines that are being followed for dispatching the engine. The local balancing authority or local transmission and distribution system operator may keep these records on behalf of the engine permittee.

2) If the permittee does not operate the engine according to the requirements in 1)a) through c) above, the engine will not be considered an emergency engine under Subpart ZZZZ and must meet all requirements for non-emergency engines. [§63.6640(f)]

3) The permittee must operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop a 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.

4) COMM-1 only – the permittee shall minimize the engine’s time spent at idle during startup and minimize the engine’s startup time to a period needed for appropriate and safe loading of the engine, not to exceed thirty minutes, after which additional standards apply (see Tables 1a, 2a, 2c, and 2d to Subpart ZZZZ) [§63.6625(h)]

5) COMM-1 only – the permittee shall [Table 2c from §63.6602 and §63.6625(j)]:

i.) change oil and filter every 500 hours of operation or annually, whichever comes first;

ii.) inspect spark plugs every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and

iii.) inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

Monitoring/Recordkeeping:
1) The permittee shall maintain an operating and maintenance log using Attachment D or an equivalent.
2) These records shall be made available immediately for inspection to the Department of Natural Resources’ personnel upon request.
3) All records must be maintained for five years.
**Reporting:**
The permittee shall report any deviations from the operational limitation, monitoring, recordkeeping, and reporting requirements of this permit condition in the semiannual monitoring report and annual compliance certification required by Section V of this permit.

---

**PERMIT CONDITION 4**

10 CSR 10-6.075 Maximum Achievable Control Technology Regulations

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>SH-1</td>
<td>0.25 mmBTU/hr fuel heater</td>
</tr>
<tr>
<td>SH-2</td>
<td>1.0 mmBTU/hr engine room heater</td>
</tr>
<tr>
<td>SH-3</td>
<td>0.5 mmBTU/hr tank heater</td>
</tr>
</tbody>
</table>

**Continuous Compliance Requirements**
The permittee shall use the following procedures for five-year tune-up inspections (see Statement of Basis for dates): [63.7540(a)(10)(i) through (vi)]

i) As applicable, inspect the burner, and clean or replace any components of the burner as necessary (the permittee may delay the burner inspection until the next scheduled unit shutdown). Units that produce electricity for sale may delay the burner inspection until the first outage, not to exceed 36 months from the previous inspection. At units where entry into a piece of process equipment or into a storage vessel is required to complete the tune-up inspections, inspections are required only during planned entries into the storage vessel or process equipment;

ii) Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer’s specifications, if available;

iii) Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (the permittee may delay the inspection until the next scheduled unit shutdown). Units that produce electricity for sale may delay the inspection until the first outage, not to exceed 36 months from the previous inspection;

iv) Optimize total emissions of CO. This optimization should be consistent with the manufacturer’s specifications, if available, and with any NOx requirement to which the unit is subject;

v) Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer; and

vi) Maintain on-site and submit, if requested by the Administrator, an annual report containing the following information:

a) The concentrations of CO in the effluent stream in parts per million by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler or process heater;

b) A description of any corrective actions taken as a part of the tune-up; and

c) The type and amount of fuel used over the 12 months prior to the tuneup, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel used by each unit.
Monitoring/Recordkeeping Requirements
The permittee shall keep a copy of each notification and report submitted to comply with Subpart DDDD. [§63.7555(a)(1)]

Reporting
The permittee shall report any deviations from the continuous compliance, monitoring, recordkeeping, and reporting requirements of this permit condition in the semiannual monitoring report and annual compliance certification required by Section V of this permit.

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>SH-1</td>
<td>0.25 mmBTU/hr fuel heater</td>
</tr>
<tr>
<td>SH-2</td>
<td>1.0 mmBTU/hr engine room heater</td>
</tr>
<tr>
<td>SH-3</td>
<td>0.5 mmBTU/hr tank heater</td>
</tr>
</tbody>
</table>

Emission Limitation:
1) The permittee shall not cause or allow emissions with an opacity greater than 20% to be discharged into the atmosphere from any of the existing sources listed.
2) Exception: A person may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six minutes in any 60 minutes air contaminants with an opacity up to 60%.

Monitoring:
1) The permittee shall conduct opacity readings on each emission unit using the procedures contained in USEPA Test Method 22. The permittee is only required to take readings when the emission unit is operating and when the weather conditions allow. If the permittee observes no visible or other significant emissions using these procedures, then no further observations are required. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct a Method 9 observation.
2) The permittee must maintain the following monitoring schedule:
   a) The permittee shall conduct weekly observations for a minimum of eight (8) consecutive weeks after permit issuance.
   b) Should the permittee observe no violations of this regulation during this period then-
      i) The permittee may observe once every two (2) weeks for a period of eight (8) weeks.
      ii) If a violation is noted, monitoring reverts to weekly.
      iii) Should no violation of this regulation be observed during this period then-
           (1) The permittee may observe once per month.
           (2) If a violation is noted, monitoring reverts to weekly.
3) If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.

Recordkeeping:
The permittee shall maintain records of all observation results using Attachment B (or equivalent):
1) Whether any air emissions (except for water vapor) were visible from the emission units;
2) All emission units from which visible emissions occurred;
3) The permittee shall maintain records of any equipment malfunctions, which may contribute to visible emissions; and,
4) The permittee shall maintain records of all USEPA Method 9 opacity tests performed.
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 is only an excerpt from the regulation or code, and is 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) Best 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 list to the director in writing at least ten days prior to any maintenance, start-up or shutdown, 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, it shall be given as soon as practicable prior to the release. If an unplanned excess release of emissions exceeding one hour occurs during maintenance, start-up or shutdown, the director shall be notified verbally as soon as practical during normal working hours and no later than the close of business of the following working day. A written notice shall follow within ten working days.

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. [10 CSR 10-6.065(6)(B)1.A(V)] The permittee shall retain the most current operating permit issued to this installation on-site. [10 CSR 10-6.065(6)(C)1.C(II)] The permittee shall immediately make such permit available to any Missouri Department of Natural Resources personnel upon request. [10 CSR 10-6.065(6)(C)3.B]

1) The permittee shall follow the procedures and requirements of 40 CFR Part 61, Subpart M for any activities occurring at this installation which would be subject to provisions for 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos.

2) The permittee shall conduct monitoring to demonstrate compliance with registration, certification, notification, and Abatement Procedures and Practices standards as specified in 40 CFR Part 61, Subpart M.

10 CSR 10-6.100  Alternate Emission Limits
Proposals for alternate emission limitations shall be submitted on Alternate Emission Limits Permit forms provided by the department. An installation owner or operator must obtain an Alternate Emission Limits Permit in accordance with 10 CSR 10-6.100 before alternate emission limits may become effective.

10 CSR 10-6.110  Submission of Emission Data, Emission Fees and Process Information
1) The permittee shall submit 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) The permittee may be required by the director to file additional reports.

3) 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.

4) 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.

5) The fees shall be payable to the Department of Natural Resources and shall be accompanied by the emissions report.

6) The permittee shall complete required reports on state supplied EIQ forms or electronically via MoEIS. Alternate methods of reporting the emissions can be submitted for approval by the director. The reports shall be submitted to the director by April 1 after the end of each reporting year. If the full emissions report is filed electronically via MoEIS, this due date is extended to May 1.

7) The reporting period shall end on December 31 of each calendar year. Each report shall contain the required information for each emission unit for the twelve (12)-month period immediately preceding the end of the reporting period.

8) The permittee shall collect, record and maintain the information necessary to complete the required forms during each year of operation of the installation.

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.

Monitoring:
The permittee shall conduct inspections of its facilities sufficient to determine compliance with this regulation. If the permittee discovers a violation, the permittee shall undertake corrective action to eliminate the violation.

The permittee shall maintain the following monitoring schedule:
1) The permittee shall conduct weekly observations for a minimum of eight (8) consecutive weeks after permit issuance.

2) Should no violation of this regulation be observed during this period then-
   a) The permittee may observe once every two (2) weeks for a period of eight (8) weeks.
   b) If a violation is noted, monitoring reverts to weekly.
   c) Should no violation of this regulation be observed during this period then-
      i) The permittee may observe once per month.
      ii) If a violation is noted, monitoring reverts to weekly.

3) If the permittee reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner to the initial monitoring frequency.

Recordkeeping:
The permittee shall document all readings on Attachment A, or its equivalent, noting the following:
1) Whether air emissions (except water vapor) remain visible in the ambient air beyond the property line of origin.
2) Whether equipment malfunctions contributed to an exceedance.
3) Any violations and any corrective actions undertaken to correct the violation.

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 10-6.250  Asbestos Abatement Projects – Certification, Accreditation, and Business Exemption Requirements

The permittee shall conduct all asbestos abatement projects within the procedures established for certification and accreditation by 10 CSR 10-6.250. This rule requires individuals who work in asbestos abatement projects to be certified by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires training providers who offer training for asbestos abatement occupations to be accredited by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires persons who hold exemption status from certain requirements of this rule to allow the department to monitor training provided to employees. Each individual who works in asbestos abatement projects must first obtain certification for the appropriate occupation from the department. Each person who offers training for asbestos abatement occupations must first obtain accreditation from the department. Certain business entities that meet the requirements for state-approved exemption status must allow the department to monitor training classes provided to employees who perform asbestos abatement.

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 by a permittee:
   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”; and
      iv) 10 CSR 10-6.080, “Emission Standards for Hazardous Air Pollutants”;
   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.
Title VI – 40 CFR Part 82 Protection of Stratospheric Ozone

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 §82.106.
   b) The placement of the required warning statement must comply with the requirements pursuant to §82.108.
   c) The form of the label bearing the required warning statement must comply with the requirements pursuant to §82.110.
   d) No person may modify, remove, or interfere with the required warning statement except as described in §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:
   a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
   b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
   c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
   d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record keeping requirements pursuant to §82.166. ("MVAC-like" appliance as defined at §82.152).
   e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to §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 §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 as specified 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, 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.
      iii) Exception. Monitoring requirements which require reporting more frequently than semi-annually shall report no later than 30 days after the end of the calendar quarter in which the measurements were taken.
   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)
The permittee shall comply with the requirements of 40 CFR Part 68, Accidental Release Prevention Requirements. If the permittee has more than a threshold quantity of a regulated substance in process, as determined by 40 CFR Section 68.115, the permittee shall submit a Risk Management Plan in accordance with 40 CFR Part 68 no later than the latest of the following dates:

1) June 21, 1999;
2) Three years after the date on which a regulated substance is first listed under 40 CFR Section 68.130; or
3) The date on which a regulated substance is first present above a threshold quantity in a process.

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, 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, 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, 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 application, 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, 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 Jimmy D. Kerns, Vice President of Operations, Central Division. 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

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

Attachments follow.
## Attachment A
Fugitive Emission Observations

<table>
<thead>
<tr>
<th>Date</th>
<th>Time</th>
<th>Visible Emissions</th>
<th>Abnormal Emissions</th>
<th>Initial</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Emission Source</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
# Attachment B

Opacity Emission Observations

<table>
<thead>
<tr>
<th>Date</th>
<th>Time</th>
<th>Emission Source</th>
<th>Visible Emissions</th>
<th>Excess Emissions</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>No</td>
<td>Yes(^1)</td>
</tr>
</tbody>
</table>

\(^1\)If there are visible emissions, the permittee shall complete the excess emissions columns.
### Attachment C

**Method 9 Opacity Emissions Observations**

<table>
<thead>
<tr>
<th>Company</th>
<th>Observer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Location</td>
<td>Observer Certification Date</td>
</tr>
<tr>
<td>Date</td>
<td>Emission Unit</td>
</tr>
<tr>
<td>Time</td>
<td>Control Device</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Hour</th>
<th>Minute</th>
<th>Seconds</th>
<th>Steam Plume (check if applicable)</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>0</td>
<td>15</td>
<td>30</td>
</tr>
<tr>
<td>0</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>4</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>5</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>6</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>7</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>8</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>9</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>10</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>11</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>12</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>13</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>14</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>15</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>16</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>17</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>18</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**SUMMARY OF AVERAGE OPACITY**

<table>
<thead>
<tr>
<th>Set Number</th>
<th>Time</th>
<th>Opacity</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Start</td>
<td>End</td>
</tr>
</tbody>
</table>

Readings ranged from ____________ to ____________ % opacity.

Was the emission unit in compliance at the time of evaluation?  
YES   NO  Signature of Observer
## Attachment D

Inspection/Maintenance/Repair/Malfunction Log

<table>
<thead>
<tr>
<th>Date/Time</th>
<th>Inspection/Maintenance Activities</th>
<th>Malfunction Activities</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Malfunction</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
ATTACHMENT E
Spark Ignition Reciprocating Internal Combustion Engine (RICE) Usage Log

Emission Unit # ________________________________

<table>
<thead>
<tr>
<th>Date</th>
<th>Duration</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
APPENDIX A
Abbreviations and Acronyms

%............percent
ºF............degrees Fahrenheit
acfm............actual cubic feet per minute
BACT......Best Available Control Technology
BMPs......Best Management Practices
Btu.........British thermal unit
CAM........Compliance Assurance Monitoring
CAS........Chemical Abstracts Service
CEMS.....Continuous Emission Monitor System
CFR.........Code of Federal Regulations
CO...........carbon monoxide
CO2..........carbon dioxide
CO2e.........carbon dioxide equivalent
COMS.....Continuous Opacity Monitoring System
CSR.........Code of State Regulations
dscf.........dry standard cubic feet
EIQ.........Emission Inventory Questionnaire
EP..........Emission Point
EPA........Environmental Protection Agency
EU...........Emission Unit
fps..........feet per second
ft............feet
GACT......Generally Available Control Technology
GHG........Greenhouse Gas
gpm..........gallons per minute
gr..........grains
GWP........Global Warming Potential
HAP........Hazardous Air Pollutant
hr............hour
hp..........horsepower
lb..........pound
lbs/hr........pounds per hour
MACT.....Maximum Achievable Control Technology
µg/m³........micrograms per cubic meter
m/s..........meters per second
Mgal.........1,000 gallons
MW............megawatt
MHDR........maximum hourly design rate
MMBtu........Million British thermal units
MMCF.........Million cubic feet
MSDS.......Material Safety Data Sheet
NAAQS......National Ambient Air Quality Standards
NESHAPs...National Emissions Standards for Hazardous Air Pollutants
NOx..........nitrogen oxides
NSPS........New Source Performance Standards
NSR........New Source Review
PM..........particulate matter
PM2.5.........particulate matter less than 2.5 microns in aerodynamic diameter
PM10........particulate matter less than 10 microns in aerodynamic diameter
ppm..........parts per million
PTE........potentially to emit
RACT......Reasonable Available Control Technology
RAL.........Risk Assessment Level
SCC........Source Classification Code
scfm.........standard cubic feet per minute
SDS........Safety Data Sheet
SIC........Standard Industrial Classification
SIP.........State Implementation Plan
SMAL........Screening Model Action Levels
SOx..........sulfur oxides
SO2..........sulfur dioxide
tph..........tons per hour
tpy..........tons per year
VMT.........vehicle miles traveled
VOC       Volatile Organic Compound
STATEMENT OF BASIS

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 January 14, 2015;
2) 2014 Emissions Inventory Questionnaire, received March 2, 2015;
3) Operating Permit OP2010-084, issued July 19, 2010;
4) Construction Permit 102007-011, issued October 17, 2007;
5) WebFIRE; and

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 10-3.060 Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating – this rule was included in the OP2010-084, but was rescinded October 30, 2011.

10 CSR 10-6.100, Alternate Emission Limits is not applicable because the installation is in an ozone attainment area.

10 CSR 10-6.260, Control of Sulfur Dioxide Emissions is not applicable to the installation. SO$_x$ emission sources are: I/C Engines 915-918, Turbines 919-920, Emergency Generators 927-928, and Space Heaters SH-1-SH-3. All of the SO$_x$ emission sources are combustion units fueled by natural gas making them exempt per 10 CSR 10-6.261(1)(A).

10 CSR 10-6.390, Control of NO$_x$ Emissions From Large Stationary Internal Combustion Engines is not applicable to the installation. The installation is located in Boone county which is not one of the applicable counties listed within 10 CSR 10-6.390(1).

10 CSR 10-6.400, Restriction of Emission of Particulate Matter From Industrial Processes is not applicable to the installation. PM emission sources are: I/C Engines 915-918, Turbines 919-920, Emergency Generators 927-928, Bead Blaster Cabinet BB, and Space Heaters SH-1-SH-3. The engines,
turbines, generators, and space heaters burn natural gas and do not fit the definition of process weight found in 10 CSR 10-6.400(2)(A). The Bead Blaster Cabinet has a potential to emit of less than 0.5 lbs of PM per hour and is exempt per 10 CSR 10-6.400(1)(B)12

10 CSR 10-6.405 Restriction of Particulate Matter Emissions From Fuel Burning Equipment Used for Indirect Heating – emission units SH-1, -2, and -3 are indirect fuel heaters and are exempt under (1)(E) because they combust only natural gas.

Construction Permit History
Construction Permit 102007-011, issued October 17, 2007 – this permit was issued for replacement of eight RICE-driven compressors with two Solar Taurus-70 turbines (EP-919 and -920).

New Source Performance Standards (NSPS) Applicability
40 CFR Part 60, Subpart GG – Standards of Performance for Stationary Gas Turbines is not applicable to the installation. The facility is complying with 40 CFR Part 60, Subpart KKKK - Standards of Performance for Stationary Combustion Turbines which states: Stationary combustion turbines regulated under this subpart are exempt from the requirements of subpart GG of this part. [§60.4305(b)]

40 CFR Part 60, Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines is not applicable to the installation. EP-915, -916, -917, and -918 were constructed in the 1960s and are grandfathered from this regulation. EP-927 and EP-928 were constructed after June 12, 2006, but as emergency engines with a maximum engine power greater than 25 HP that were manufactured prior to January 1, 2009 they are not subject [§60.4230(a)(4)(iv)]. EP-COMM-1 was constructed (i.e. ordered by facility) before June 12, 2006 and is exempt under §63.4230(4).

40 CFR Part 60, Subpart KKKK - Standards of Performance for Stationary Combustion Turbines is applicable to Turbines EP-919 and EP-920 and has been applied within this permit. The units were installed in 2007.

Maximum Achievable Control Technology (MACT) Applicability
The installation is a major source for Hazardous Air Pollutants (HAPs).

40 CFR Part 63, Subpart HHH – National Emission Standards for Hazardous Air Pollutants From Natural Gas Transmission and Storage Facilities is not applicable to the installation. The installation does not have any glycol dehydration units and is, therefore, not subject to the requirements of this subpart [§63.1270(b) and §63.1270(c)].

40 CFR Part 63, Subpart YYYY – National Emission Standards for Hazardous Air Pollutants for Stationary Combustion Turbines is applicable to EP-919 and EP-920. The only requirement for these gas-fired stationary combustion turbines is initial notification, the permittee need not comply with any other requirement of this subpart until EPA takes final action to require compliance and publishes a document in the Federal Register. [§63.6095(d)] Initial notification was submitted October 3, 2008.
40 CFR Part 63, Subpart ZZZZ—National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE) is applicable to EP-927, -928, and COMM-1 and has been applied as Permit Condition 3. Initial notification was submitted May 19, 2009. EP-915, -916, -917, and -918 are existing 2-stroke lean burn engines and have no applicable requirements under §63.6600(c).

40 CFR Part 63, Subpart DDDDD—National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters is applicable to process heaters SH-1, -2, and -3. The energy assessment required by Subpart DDDDD was conducted on February 19, 2015. The next five-year tune-up required by Permit Condition 4 must be completed by February 19, 2020.

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.

40 CFR Part 64 is not applicable because none of the pollutant-specific emission units uses a control device to achieve compliance with a relevant standard.
### Updated Potential to Emit for the Installation

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Potential to Emit (tons/yr)(^1)</th>
</tr>
</thead>
<tbody>
<tr>
<td>CO</td>
<td>984.38</td>
</tr>
<tr>
<td>HAP (total)</td>
<td>46.96</td>
</tr>
<tr>
<td>NO(_x)</td>
<td>2,441.45</td>
</tr>
<tr>
<td>PM(_{10})</td>
<td>58.72</td>
</tr>
<tr>
<td>PM(_{2.5})</td>
<td>58.72</td>
</tr>
<tr>
<td>SO(_x)</td>
<td>4.80</td>
</tr>
<tr>
<td>VOC</td>
<td>123.88</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Individual HAPs</th>
<th>Potential to Emit (tons/yr)(^1)</th>
</tr>
</thead>
<tbody>
<tr>
<td>2,2,4 Trimethylpentane</td>
<td>0.50</td>
</tr>
<tr>
<td>Acetaldehyde</td>
<td>4.61</td>
</tr>
<tr>
<td>Acrolein</td>
<td>4.62</td>
</tr>
<tr>
<td>Benzene</td>
<td>1.15</td>
</tr>
<tr>
<td>Ethylbenzene</td>
<td>0.06</td>
</tr>
<tr>
<td>Formaldehyde</td>
<td>33.45</td>
</tr>
<tr>
<td>Hexane</td>
<td>0.26</td>
</tr>
<tr>
<td>Methanol</td>
<td>1.47</td>
</tr>
<tr>
<td>Methylene chloride</td>
<td>0.09</td>
</tr>
<tr>
<td>Toluene</td>
<td>0.57</td>
</tr>
<tr>
<td>Xylene</td>
<td>0.16</td>
</tr>
</tbody>
</table>

\(^1\)Each emission unit was evaluated at 8,760 hours of uncontrolled annual operation, except for the emergency generators which were evaluated at 500 hours. PTE calculation does not include emissions from points listed in the Emission Units without Limitations table on pages 4 & 5 of the operating permit.

### Other Regulatory Determinations

10 CSR 10-6.220, *Restriction of Emission of Visible Air Contaminants* is applicable to the installation. PM emission sources are: I/C Engines 915-918, Turbines 919-920, Emergency Generators 927-928 & COMM-1, and Space Heaters SH-1-SH-3. The engines, turbines, and generators as internal combustion engines are exempt per 10 CSR 10-6.220(1)(A).

### 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

A draft of the Part 70 Operating Permit for Centralia Compressor Station was placed on public notice on June 2, 2016, by the Missouri Department of Natural Resources (MDNR). Comments were received from Mr. Robert Cheever of Region VII of the Environmental Protection Agency. The four comments are addressed in the order in which they appear within the letter.

Comment #: 1
Operational Limitation 2) in Permit Condition 1 says “(T)he permittee shall not operate any emergency generator (EP-919, -920, -927, or -928) for …. EP 919 and EP 920 are not emergency generators they are natural gas fired turbine driven natural gas compressors. May want to modify the language to fit the facility.
Response to Comment:
EP-919 and -920 were incorrectly included in Operational Limitation 2. They were removed.

Comment #: 2
Monitoring/ testing requirement 2) in Permit Condition 2 says “(T)he permittee must conduct an initial performance test as required in §60.8.” I suspect that this initial performance test may have already been completed and therefore, this requirement may no longer be applicable.
Response to Comment:
The reference to the initial testing was removed.

Comment #: 3
Monitoring / testing requirement 3) a) and 3) b) in Permit Condition 2 indicate the permittee must be in compliance with the applicable emission limits in §60.4320. The emission limits in §60.4320 are specified in the emissions limitation section of Permit Condition 2. Therefore it might be more effective to refer to the limits stated earlier in the permit condition rather than referring the permittee to the regulatory citation.
Response to Comment:
References throughout the permit were checked and redirected to the permit condition.

Comment #: 4
The section in the Statement of Basis; 40 CFR Part 63, Subpart ZZZZ – National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE) says “EP-915, -916, -917, and -918 are existing 2-stroke lean burn emergency engines and have no applicable requirements under §63.6600(c).” §63.6600(c) does in fact say “If you own or operate any of the following stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions, you do not need to comply with the emission limitations in Tables 1a, 2a, 2c, and 2d to this subpart or operating limitations in Tables 1b and 2b to this subpart: an existing 2SLB stationary RICE; an existing 4SLB stationary RICE; a stationary RICE that combusts landfill gas or digester gas equivalent to 10 percent or more of the gross heat input on an annual basis; an emergency stationary RICE; or a limited use stationary RICE. However, there is no reference to “emergency engines.” These four (4) RICE driven natural gas compressors DO NOT satisfy the definition of “emergency engines;” so it would be best to remove the words “emergency Engines” from the first sentence at the top of page SB-3.
Response to Comment:
The word “emergency” was removed.
Mr. Jimmy D. Kerns  
Centralia Compressor Station  
16151 N. Route Z  
Centralia, MO  65240

Re:  Centralia Compressor Station, 019-0077  
     Permit Number: OP2016-026

Dear Mr. Kerns:

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:bjj

Enclosures

c:  PAMS File: 2015-01-022