



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: OP2013-050A
Expiration Date: August 11, 2018
Installation ID: 007-0060
Project Number: 2013-10-067

Installation Name and Address

Rockies Express Pipeline, LLC
Mexico Compressor Station
7676 Audrain Road 441
Rush Hill, MO 65280-2127
Audrain County

Parent Company's Name and Address

Rockies Express Pipeline, LLC
370 Van Gordon Street
Lakewood, CO 80228-8304

Installation Description:

According to the GHG Tailoring Rule, the permittee became a major source and subject to Part 70 permitting requirements as of July 1, 2011, based on the facility's GHG emissions.

DEC 13 2013

Effective Date


Director or Designee
Department of Natural Resources

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I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION

This amendment changes the insignificant activities list and corrects some descriptors, as follows:

1. Add insignificant unit (EP05), a 4,200 gallon condensate storage tank, and update potential annual tank throughput. The tank was listed in the permit application but was not added to the original permit. The tank capacity is updated from 5,830 gallons to 4,200 gallons.
2. Correct the heat input rating for the fuel gas heater (EP04) from 0.75 mmBtu/hr to 0.864 mmBtu/hr. This change does not subject the unit to applicable requirements.
3. Correct the capacity of the waste water storage tank (EP06) and update potential annual tank throughput. Permit application listed 5,830 gallons the permit lists 5,040 gallons.
4. Update the number of space heaters (EP07) currently being used at the compressor station. The facility has fourteen catalytic space heaters, not sixteen catalytic space heaters. Twelve space heaters are rated at 0.06 mmBtu/hr per heater and two space heaters are rated at 0.0025 mmBtu/hr per heater.
5. Update the facility address. The facility physical address and mailing address are updated to reflect Rush Hill.
6. Update installation and parent company contact information.

This permit for the Rockies Express Pipeline, LLC (Rockies Express), Mexico Compressor Station is based on the Greenhouse Gas (GHG) Tailoring Rule which was finalized on May 13, 2010. The Mexico Compressor Station is located at County Road 441, north of State Highway KK, northeast of Mexico, Missouri, in Audrain County. According to the GHG Tailoring Rule, the facility became a major source and subject to Part 70 permitting requirements as of July 1, 2011, based on the facility's GHG emissions. This permit application is being submitted within twelve months of the effective date of July 1, 2011, as required by the Tailoring Rule. The permittee is subject to "Step 2" of the Tailoring Rule because the facility has the potential-to-emit (PTE) of at least 100,000 tons per year (tpy) of carbon dioxide equivalents (CO₂e), and also has the PTE of 100 tpy of GHGs on a mass basis. A Part 70 operating permit would not otherwise be required for the permittee as a result of non-GHG emissions.

The compressor station is equipped with two gas turbines (EP-1) and (EP-2), an emergency generator (EP-3), a process gas heater (EP-4), two small liquid storage tanks (EP-5) and (EP-6), and 16 small space heaters (EP-7).

Natural gas enters the station and goes through a filter separator, where liquids are dropped out of the gas and routed to the 4,200 gallon condensate tank (EP-5). The condensate in the tank will be drained into a tanker truck for disposal on an as needed basis.

The gas is directed to two compression turbines (EP-1) and (EP-2) where the gas will be compressed. Two identical Solar Model Titan-130 natural gas combustion turbines will be installed with a rated horsepower of 20,500 hp each. Each turbine is equipped with SoLoNO_x technology to reduce NO_x emissions.

Before gas enters the turbines to be compressed, a portion of the gas is diverted to a line for use as fuel gas for the turbines and emergency generator. A 0.864 mmBtu/hr fuel gas heater (EP-4) heats the fuel gas.

A Caterpillar Model G3412 TA - 350 kW (566 hp) natural gas fired emergency generator (EP-3) is used if the power is lost. The natural gas fired engine for the generator is a four-cycle, rich burn, reciprocating internal combustion engine (RICE). It has no emission control devices but is limited to 500 hours operation per year.

Another 5,830 gallon tank (EP-6) holds waste water collected from a waste water sump located below the turbines. The waste water sump is set below the turbines to collect any drain water used during cleaning and maintenance of the turbines. Emissions from the sump are assumed to be negligible. The waste water collected in the sump is pumped to a waste water holding tank (EP-6) for storage until the tank is drained by a tanker truck on an as needed basis.

In addition to the previously listed equipment, fourteen natural gas fired catalytic space heaters (EP-7) provide heat to the station buildings during cold weather.

The Mexico Compressor Station was issued a Permit to Construct from the Missouri Department of Natural Resources on October 22, 2008 (Permit Number 102008-005). The permittee submitted a Basic Operating Permit Notification on August 28, 2009. Rockies Express performed a permanent replacement of a stationary combustion turbine, EP-2, during July 2011.

Reported Air Pollutant Emissions, tons per year			
Pollutants	2011	2010	2009
Particulate Matter ≤ Ten Microns (PM ₁₀)	31	35	12
Particulate Matter ≤ 2.5 Microns (PM _{2.5})	31	7	12
Sulfur Oxides (SO _x)	4	4	1
Nitrogen Oxides (NO _x)	63	72	25
Volatile Organic Compounds(VOC)	7	8	3
Carbon Monoxide (CO)	63	73	25
Lead (Pb)	-- ¹	--	--
Hazardous Air Pollutants (HAPs) ²	3	4	1
Ammonia (NH ₃)	--	--	--

¹ "--" indicates that no emissions were reported for that year.

² This HAPs amount was submitted annually either as PM₁₀ or VOC.

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.

ID	Unit Description
EP-01	Combustion Turbine #1, Solar, Titan – 130, 20,500 hp
EP-02	Combustion Turbine #2, Solar, Titan – 130, 20,500 hp
EP-03	Emergency Generator, Caterpillar, G3412 TA, 566 hp
	All sources of visible emissions

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.

ID	Unit Description
EP-04	0.864 mmBtu/hr Bruest HC-850 catalytic fuel gas heater
EP-05	4,200 gallon condensate storage tank
EP-06	5,830 gallon waste water storage tank
EP-07	Bruest 52460 Catalytic Space Heaters (12 @ 0.06 mmBtu/hr) Bruest SR-8 Catalytic Space Heaters (2 @ 0.0025 mmBtu/hr)
FUG	Equipment Leaks

DOCUMENTS INCORPORATED BY REFERENCE

These documents have been incorporated by reference into this permit.

- Permit to construct 102008-005 (department project number 2007-06-085), issued October 22, 2008.

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 following requirements apply to *all conditions* in this permit, unless otherwise noted.

Monitoring:

The permittee shall calibrate, maintain and operate all instruments and control equipment according to the manufacturer's recommendations or according to good engineering practices.

Recordkeeping:

The permittee shall record all required recordkeeping (i.e. inspections and corrective actions) in an appropriate format. Records may be kept electronically using database or workbook systems, as long as all required information is readily available for compliance determinations. The permittee's written inspection procedures will be made available to department personnel upon request.

Reporting³:

- 1) The permittee shall report any exceedance of any of the terms imposed by this permit, or any malfunction which could cause an exceedance of any of the terms imposed by this permit, no later than ten (10) days after the exceedance or event causing the exceedance (unless otherwise specified in the specific condition), to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102
- 2) The permittee shall submit an annual certification⁴ 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. All deviations and Part 64 exceedances and excursions must be included in the compliance certifications. These certifications shall be submitted annually by **April 1st**, unless the applicable requirement specifies more frequent submission. These certifications shall be submitted to Environmental Protection Agency, Region VII, 11201 Renner Boulevard, Lenexa, KS 66219, and the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102.

³ Refer to General Permit Requirements, 10 CSR 10-6.065(6)(C)1.C General Recordkeeping and Reporting Requirements, page 16, for additional details, including semi-annual reporting of monitoring data.

⁴ Refer to General Permit Requirements, 10 CSR 10-6.065(6)(C)3 Compliance Requirements, page 18, for more details.

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.

Combustion Turbines	
Emission Unit	Description
EP-01	Combustion Turbine #1, Solar, Titan 130, constructed 01/01/2009
EP-02	Combustion Turbine #2, Solar, Titan 130, constructed 01/01/2009 (replaced like-kind 07/2011)

Permit Condition 1 EP-01, EP-02 10 CSR 10-6.070, <i>New Source Performance Regulations</i> , 40 CFR 60, <i>Subpart KKKK—Standards of Performance for Stationary Combustion Turbines</i>
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Emission Limitation:

- 1) The permittee shall not emit NO_x greater than 25 ppm at 15 percent O₂ or 150 ng/J of useful output (1.2 lb/MWh). [§ 60.4320(a), Table 1 for new turbine firing natural gas]
- 2) The permittee must not burn any fuel which contains total potential sulfur emissions in excess of 26 ng SO₂ /J (0.060 lb SO₂ /MMBtu) heat input. If your turbine simultaneously fires multiple fuels, each fuel must meet this requirement. [§ 60.4330(a)(2)]

Monitoring / Recordkeeping:

The permittee must perform annual performance tests in accordance with § 60.4400 to demonstrate continuous compliance. If the NO_x emission result from the performance test is less than or equal to 75 percent of the NO_x emission limit for the turbine, you may reduce the frequency of subsequent performance tests to once every two years (no more than 26 calendar months following the previous performance test). If the results of any subsequent performance test exceed 75 percent of the NO_x emission limit for the turbine, you must resume annual performance tests. [§ 60.4340(a)]

Reporting:

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)]

Emergency Generator	
Emission Unit	Description
EP-03	Emergency Generator, Caterpillar, G3412 TA, 566 hp

Permit Condition 1 EP-03 10 CSR 10-6.060 Construction Permits Required, Permit 102008-005

Emission Limitations:

The permittee shall not operate EP-03 for more than 500 hours annually.

Monitoring:

EP-3 shall be equipped with a non-resettable meter showing hours of operation.

Recordkeeping:

The permittee shall record the annual hours of operation to demonstrate compliance.

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) Refer to the regulation for a complete list of allowances. The following is a listing of exceptions to the allowances:
 - a) Burning of household or domestic refuse. Burning of household or domestic refuse is limited to open burning on a residential premises having not more than four dwelling units, provided that the refuse originates on the same premises, with the following exceptions:
 - i) Kansas City metropolitan area. The open burning of household refuse must take place in an area zoned for agricultural purposes and outside that portion of the metropolitan area surrounded by the corporate limits of Kansas City and every contiguous municipality;
 - ii) Springfield-Greene County area. The open burning of household refuse must take place outside the corporate limits of Springfield and only within areas zoned A-1, Agricultural District;
 - iii) St. Joseph area. The open burning of household refuse must take place within an area zoned for agricultural purposes and outside that portion of the metropolitan area surrounded by the corporate limits of St. Joseph; and
 - iv) St. Louis metropolitan area. The open burning of household refuse is prohibited;
 - b) Yard waste, with the following exceptions:
 - i) Kansas City metropolitan area. The open burning of trees, tree leaves, brush or any other type of vegetation shall require an open burning permit;
 - ii) Springfield-Greene County area. The City of Springfield requires an open burning permit for the open burning of trees, brush or any other type of vegetation. The City of Springfield prohibits the open burning of tree leaves;
 - iii) St. Joseph area. Within the corporate limits of St. Joseph, the open burning of trees, tree leaves, brush or any other type of vegetation grown on a residential property is allowed during the following calendar periods and time-of-day restrictions:
 - (1) A three (3)-week period within the period commencing the first day of March through April 30 and continuing for twenty-one (21) consecutive calendar days;
 - (2) A three (3)-week period within the period commencing the first day of October through November 30 and continuing for twenty-one (21) consecutive calendar days;
 - (3) The burning shall take place only between the daytime hours of 10:00 a.m. and 3:30 p.m.; and
 - (4) In each instance, the twenty-one (21)-day burning period shall be determined by the director of Public Health and Welfare of the City of St. Joseph for the region in which the

- City of St. Joseph is located provided, however, the burning period first shall receive the approval of the department director; and
- iv) St. Louis metropolitan area. The open burning of trees, tree leaves, brush or any other type of vegetation is limited to the period beginning September 16 and ending April 14 of each calendar year and limited to a total base area not to exceed sixteen (16) square feet. Any open burning shall be conducted only between the hours of 10:00 a.m. and 4:00 p.m. and is limited to areas outside of incorporated municipalities;
 - 3) 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.
 - 4) The permittee may be issued an annually renewable open burning permit for open burning provided that an air curtain destructor or incinerator is utilized and only tree trunks, tree limbs, vegetation or untreated wood waste are burned. Open burning shall occur at least two hundred (200) yards from the nearest occupied structure unless the owner or operator of the occupied structure provides a written waiver of this requirement. Any waiver shall accompany the open burning permit application. The permit may be revoked if the permittee fails to comply with the provisions or any condition of the open burning permit.
 - a) In a nonattainment area, as defined in 10 CSR 10-6.020, paragraph (2)(N)5., the director shall not issue a permit under this section unless the owner or operator can demonstrate to the satisfaction of the director that the emissions from the open burning of the specified material would be less than the emissions from any other waste management or disposal method.
 - 5) Reporting and Recordkeeping. New Source Performance Standard (NSPS) 40 CFR Part 60 Subpart CCCC establishes certain requirements for air curtain destructors or incinerators that burn wood trade waste. These requirements are established in 40 CFR 60.2245-60.2260. The provisions of 40 CFR Part 60 Subpart CCCC promulgated as of September 22, 2005, shall apply and are hereby incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401. To comply with NSPS 40 CFR 60.2245-60.2260, sources must conduct an annual Method 9 test. A copy of the annual Method 9 test results shall be submitted to the director.
 - 6) Test Methods. The visible emissions from air pollution sources shall be evaluated as specified by 40 CFR Part 60, Appendix A–Test Methods, Method 9–Visual Determination of the Opacity of Emissions from Stationary Sources. The provisions of 40 CFR Part 60, Appendix A, Method 9 promulgated as of December 23, 1971, is incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401.

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]

**10 CSR 10-6.080 Emission Standards for Hazardous Air Pollutants and 40 CFR Part 61
Subpart M National Emission Standard for Asbestos**

- 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 10-6.110 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 10-6.170

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

Emission Limitation:

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

10 CSR 10-6.180 Measurement of Emissions of Air Contaminants

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

10 CSR 10-6.165 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.

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 recordkeeping 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*

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”;
 - iv) 10 CSR 10-6.080, “Emission Standards for Hazardous Air Pollutants”; or
 - b) Other testing, monitoring, or information gathering methods, if approved by the director, that produce information comparable to that produced by any method listed above.

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 Recordkeeping and Reporting Requirements

- 1) Recordkeeping
 - 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's 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, recordkeeping, reporting, or any other requirements of the permit, this includes deviations or Part 64 exceedances.
 - d) Submit supplemental reports as required or as needed. Supplemental reports are required no later than ten days after any exceedance of any applicable rule, regulation or other restriction. 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 semi-annual 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.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)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 semi-annually (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's 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's 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), recordkeeping, 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's 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 Air Pollution Control Program shall place a copy with the permit in the public file. Written notice shall be provided to the EPA and the Air Pollution Control Program 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 Air Pollution Control Program 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 written notice of the change to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, no later than the next annual emissions report. This notice shall not be required for changes that are insignificant activities under 10 CSR 10-6.065(6)(B)3. 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)12 Responsible Official

The application utilized in the preparation of this permit was signed by Edward J. Donohoe, Director of Operations - Great Plains Region. 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) The Missouri Department of Natural Resources 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) The Missouri Department of Natural Resources 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 C

Method 9 Opacity Emissions Observations								
Company					Observer			
Location					Observer Certification Date			
Date					Emission Unit			
Time					Control Device			
Hour	Minute	Seconds				Steam Plume (check if applicable)		Comments
		0	15	30	45	Attached	Detached	
	0							
	1							
	2							
	3							
	4							
	5							
	6							
	7							
	8							
	9							
	10							
	11							
	12							
	13							
	14							
	15							
	16							
	17							
	18							
SUMMARY OF AVERAGE OPACITY								
Set Number	Time				Opacity			
	Start	End		Sum	Average			

Readings ranged from _____ to _____ % opacity.

Was the emission unit in compliance at the time of evaluation? _____
 YES NO Signature of Observer

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 May 7, 2012;
Part 70 Operating Permit Application, Administrative Amendment, received November 1, 2013.
- 2) The most recent five (5) years of Emissions Inventory Questionnaire (MoEIS);
- 3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition; and,
- 4) The Basic Operating Permit Notification issued on August 28, 2009.

Project History

Project Reference No.	Permit No.	Date Received	Date Completed	Description
2007-06-085	102008-005	06/21/07	10/22/08	The construction of a new gas pipeline compressor station.
2009-07-063		07/27/09	08/27/09	Return Receipt of the Basic Operating Permit Notification/Application
2011-08-011		08/01/11	12/20/11	No construction permit is required determination for the replacement of a Solar Titan 130 natural gas fired turbine engine with an identical make and model Solar Titan 130 natural gas fired turbine engine

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

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

None

Other Air Regulations Determined Not to Apply to the Operating Permit

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

10 CSR 10-6.100, *Alternate Emission Limits*

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

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

This rule does not apply to "Internal combustion engines operated outside the Kansas City or St. Louis metropolitan areas and stationary internal combustion engines operated in the Kansas City or St. Louis metropolitan areas" (10-6.220 1.A). Also, the turbines are subject to 40 CFR 60 Subpart KKKK, and therefore qualify for the following exemption:

10 CSR 10-6.220(1)(H) Emission sources regulated by 10 CSR 10-6.070 and the provisions of 40 CFR Part 60, promulgated as of July 1, 2007, and hereby incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401. This rule does not incorporate any subsequent amendments or additions;

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

The amended rule provides exemption for sources subject to New Source Performance Standards and this rule. The rule also includes an exemption for combustion equipment that uses exclusively pipeline grade natural gas as defined in 40 CFR 72.2 or liquefied petroleum gas as defined by American Society for Testing and Materials (ASTM), or any combination of these fuels. All combustion equipment at the installation uses pipeline grade natural and are exempt from the requirements of this rule.

Construction Permit Items

The Mexico Compressor Station was issued a Permit to Construct from the Missouri Department of Natural Resources on October 22, 2008 (Permit Number 102008-005). Rockies Express performed a permanent replacement of stationary combustion turbine EP-2 during July, 2011. The 20,500 hp Solar Titan 130 turbine was replaced with an identical unit (i.e., same make and model). Emission rates remained unchanged from the original permitted unit. There have been no additional modifications at the facility since the issuance of the original permits.

The following revisions were made to construction permits for this installation:

None

New Source Performance Standards (NSPS) Applicability Issues

40 CFR 60 Subpart KB--STANDARDS OF PERFORMANCE FOR VOLATILE ORGANIC LIQUID STORAGE VESSELS (INCLUDING PETROLEUM LIQUID STORAGE VESSELS) FOR WHICH CONSTRUCTION, RECONSTRUCTION, OR MODIFICATION COMMENCED AFTER JULY 23, 1984

Following a review of Title 40 of the CFR Part 60 subpart Kb (40 CFR 60 Kb), it has been determined that volatile organic liquid (VOL) storage tanks at the Mexico Compressor Station do not meet the applicability criteria as described in the regulation. The storage tanks do not exceed the capacity requirement of 75 cubic meters (m³) (19,812 gallons).

40 CFR 60 Subpart GG--STANDARDS OF PERFORMANCE FOR STATIONARY GAS TURBINES

Stationary gas turbines with a heat input equal to or greater than ten mmBtu/hr, constructed after October 3, 1977, are affected sources under Title 40 of the CFR Part 60 subpart GG (40 CFR 60 GG).

Construction is intended to include new, modified, or reconstructed sources of pollutants, not sources that were previously installed and have been relocated. The turbines at the Mexico Compressor Station are subject to 40 CFR 60 Subpart KKKK (see discussion below). According to 40 CFR 60.4305, turbines subject to 40 CFR 60 Subpart KKKK are exempt from the requirements of 40 CFR Subpart GG, so the facility is not subject to Subpart GG.

40 CFR 60 Subpart IIII--*STANDARDS OF PERFORMANCE FOR STATIONARY COMPRESSION IGNITION INTERNAL COMBUSTION ENGINES*

This facility is not subject to Title 40 of the CFR Part 60 subpart IIII (40 CFR 60 IIII) because the facility does not have a stationary compression ignition (CI) internal combustion engines (ICE) that commenced construction, modification or reconstruction after July 11, 2005.

40 CFR 60 Subpart JJJJ--*STANDARDS OF PERFORMANCE FOR STATIONARY SPARK IGNITION INTERNAL COMBUSTION ENGINES*

This facility is not subject to Title 40 of the CFR Part 60 subpart JJJJ (40 CFR 60 JJJJ) because the emergency spark ignition (SI) internal combustion engines (ICE) (EP-3) was ordered (i.e., manufactured) prior to January 1, 2009 (60.4230). For this subpart, the date that manufacturing commences is the date the engine is ordered by the owner or operator.

40 CFR 60.4230 reads in part:

- (a) The provisions of this subpart are applicable to manufacturers, owners, and operators of stationary spark ignition (SI) internal combustion engines (ICE) as specified in paragraphs (a)(1) through (6) of this section. For the purposes of this subpart, the date that construction commences is the date the engine is ordered by the owner or operator.
- (3) Manufacturers of stationary SI ICE with a maximum engine power greater than 19 KW (25 HP) that are not gasoline fueled and are not rich burn engines fueled by LPG, where the manufacturer participates in the voluntary manufacturer certification program described in this subpart and where the date of manufacture is:
 - (i) On or after July 1, 2007, for engines with a maximum engine power greater than or equal to 500 HP (except lean burn engines with a maximum engine power greater than or equal to 500 HP and less than 1,350 HP);
 - (ii) On or after January 1, 2008, for lean burn engines with a maximum engine power greater than or equal to 500 HP and less than 1,350 HP;
 - (iii) On or after July 1, 2008, for engines with a maximum engine power less than 500 HP; or
 - (iv) On or after January 1, 2009, for emergency engines.**

40 CFR 60 Subpart KKKK--*STANDARDS OF PERFORMANCE FOR STATIONARY COMBUSTION TURBINES*

Title 40 of the CFR Part 60 subpart KKKK (40 CFR 60 KKKK; Standards of Performance for Stationary Combustion Turbines) applies to new, modified, or reconstructed stationary combustion turbines with a heat input equal to or greater than 10 mmBtu/hr. that commenced construction, reconstruction, or modification after February 18, 2005. The Mexico Compressor Station is subject to this NSPS because the EP-1 and EP-2 were constructed after February 18, 2005. According to Table 1 of 40 CFR 60 Subpart KKKK, the NO_x emission limit for the turbines is 25 parts per million (ppm) at 15% O₂ or 1.2 pound (lb.) NO_x per mega-watt hour (MWh) output. Subpart 60.4330 lists the SO₂ emission limit at 0.06 lb. SO₂ per mmBtu. Rockies Express has performed an initial performance tests

and performs annual performance tests for NO_x in accordance with 60.4340(a) and demonstrates SO₂ compliance by methods identified in 60.4365(a) or (b).

Maximum Achievable Control Technology (MACT) Applicability Issues

NESHAP and MACT standards regulate hazardous air pollutants (HAPs) and are published in 40 CFR Parts 61 and 63. 40 CFR Part 63 generally applies to major sources of HAPs: any source that has the potential to emit ten tpy of a single HAP or 25 tpy of combined HAPs. The Mexico Compressor Station is not a major source of HAPs emissions (i.e., emissions are below the 10/25 tpy limits) so most MACT standards are not applicable.

40 CFR 63 Subpart ZZZZ—National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

Emissions unit EP-03 falls under the category of an emergency generator at an area source of HAPs. According to 40 CFR 63.6590(c), the emergency generator will meet the requirements of Subpart ZZZZ by complying with applicable requirements of 40 CFR 60 Subpart JJJJ. However, as an emergency generator manufactured before January 1, 2009, there are no applicable requirements under 40 CFR 60 subpart JJJJ for EP-03.

40 CFR 63 Subpart YYYY—National Emission Standards for Hazardous Air Pollutants for Stationary Combustion Turbines

This regulation does not apply to the Mexico Compressor Station because the facility is not a major source of HAP emissions.

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability Issues

In the permit application and according to Air Pollution Control Program records, there was no indication that any Missouri Air Conservation Law, Asbestos Abatement, 643.225 through 643.250; 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.

This facility is not subject to the Compliance Assurance Monitoring (CAM) rule, Title 40 of the CFR Part 64 (40 CFR 64). None of the units at the Mexico Compressor Station meet the applicability criteria

as described in the regulation. The units do not use control devices to achieve compliance with any emission limitation or standard. Therefore, no CAM plan is necessary.

Greenhouse Gas Emissions

Rockies Express Pipeline, LLC (Rockies Express) is submitting this Part 70 Operating Permit application for the Mexico Compressor Station in compliance with the Greenhouse Gas (GHG) Tailoring Rule which was finalized on May 13, 2010. According to the GHG Tailoring Rule, the facility became a major source and subject to Title V permitting requirements as of July 1, 2011 based on the facility's GHG emissions. This permit application is being submitted within twelve months of the effective date of July 1, 2011 as required by the Tailoring Rule. The source (Mexico Compressor Station) is subject to "Step 2" of the Tailoring Rule because the facility has the potential-to-emit (PTE) at least 100,000 tons per year (tpy) carbon dioxide equivalents (CO₂e), and also has the PTE 100 tpy of GHGs on a mass balance basis. A Part 70 permit would not otherwise be required for the source as a result of non-GHG emissions.

At the time of permit issuance, there were no applicable GHG requirements for this source.

40 CFR 98 – *Mandatory Reporting Rule for Greenhouse Gases* (MRR)

The Mexico Compressor Station is subject to MRR Subpart C, as facility combustion emissions exceeded the 25,000 metric ton per year reporting threshold in 2010. Rockies Express submitted the Subpart A and Subpart C report to EPA's electronic greenhouse gas reporting system on September 20, 2011 for calendar year 2010 emissions. Rockies Express will continue to comply with MRR, including Subpart W reporting, which is required beginning with reporting year 2011.

The preamble of the GHG Reporting Rule clarifies that Part 98 requirements do not have to be incorporated in Part 70 permits operating permits at this time. In addition, Missouri regulations do not require the installation to report CO₂ emissions in their Missouri Emissions Inventory Questionnaire; therefore, the installation's CO₂ emissions were not included within this permit. The applicant is required to report the data directly to EPA.

Updated Potential to Emit for the Installation

Pollutant	Potential to Emit (tons/yr.) ⁵
CO	80
CO ₂ e	134,959
HAP	4
NO _x	85
PM ₁₀	38
PM _{2.5}	38
SO _x	5
VOC	12

⁵ Each emission unit was evaluated at 8,760 hours of uncontrolled annual operation unless otherwise noted.

Other Regulatory Determinations

40 CFR 52.21 - *Prevention of Significant Deterioration (PSD)* The Mexico Compressor Station is located in an area that is in attainment for all criteria pollutants and the facility is not included in one of the 28 categories of stationary sources identified in Title 40 of the Code of Federal Regulations (CFR) Part 52.21(b)(1)(iii) (40 CFR 52.21(b)(I)(iii)). Therefore, the Mexico Compressor Station is not considered a major source (per 40 CFR Part 52.2 1 (b)(1)(i)(b)) because the project emissions for the criteria pollutants are below 250 tons per year (tpy). Additionally, there is no major modification (greater than 40 tons of NOX, or greater than 100 tons of CO) involved with this Part 70 Operating Permit Application, therefore, the provisions of the PSD program do not apply at this time.

40 CFR 68 – *Risk Management Program (RMP)*

The Mexico Compressor Station is not subject to the requirements of the Risk Management Program (RMP) under Section 112(r) of the Clean Air Act (CAA) because toxic and/or flammable components are not retained in quantities that exceed the applicable threshold quantities of this regulation.

40 CFR 82 – *Stratospheric Ozone Protection*

Following a review of Title 40 of the CFR Part 82, it has been determined that Mexico Compressor Station uses one or more of the chemicals listed as stratospheric ozone depleting chemicals. The Mexico Compressor Station has air conditioning units that use stratospheric ozone depleting chemicals. None of the air conditioning units contain greater than 50 lbs. of chemicals.

The requirements of the CAA Title VI Section 611 apply to the labeling of products using ozone-depleting substances. The facility is in compliance with the labeling requirements of this part. The requirements of the CAA Title VI Section 608 apply to the use and disposal of class I and II substances at the facility. The facility is in compliance with the regulations established in Section 608 for use and disposal of any class I and II substance. The requirements of Title VI Section 609 apply to the servicing of motor vehicle air conditioners. These requirements do not apply to the facility because motor vehicle servicing is not practiced at the facility.

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 Air Pollution Control Program'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 Air Pollution Control Program records a schedule for achieving compliance for that regulation(s).

Prepared by:

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