INTERMEDIATE STATE 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 here in.

Intermediate Operating Permit Number: OP2010-091
Expiration Date: AUG 05 2015
Installation ID: 037-0048
Project Number: 2009-12-044

Installation Name and Address
Peculiar Compressor Station
24304 S. Harper St.
Peculiar, MO 64078
Cass County

Parent Company's Name and Address
Southern Star Central Gas Pipeline, Inc.
P.O. Box 20010
Owensboro, KY 42304

Installation Description:
Southern Star Central Gas Pipeline, Inc.'s Peculiar Compressor Station is a natural gas transmission station. The transmission station consists of two large reciprocating engines, a large turbine, an emergency generator, and a small boiler. The facility is a synthetic minor source of Nitrogen Oxides (NOx).
Table of Contents

I. INSTALLATION DESCRIPTION AND EQUIPMENT LISTING ..............................................................3

II. PLANT WIDE EMISSION LIMITATIONS ............................................................................................4

   PERMIT CONDITION PW001 ....................................................................................................................4
   10 CSR 10-6.065(2)(C) and 10 CSR 10-6.065(5)(A) Voluntary Limitation(s) ........................................4

III. EMISSION UNIT SPECIFIC EMISSION LIMITATIONS ....................................................................5

   PERMIT CONDITION 001 ..........................................................................................................................5
   10 CSR 10-6.060 Construction Permits Required..................................................................................5
   Construction Permit No. 072000-009, Issued June 19, 2000 .................................................................5

   PERMIT CONDITION 002 ..........................................................................................................................7
   10 CSR 10-6.070 New Source Performance Regulations ......................................................................7
   40 CFR Part 60, Subpart GG – Standards of Performance for Stationary Gas Turbines ......................7

IV. CORE PERMIT REQUIREMENTS ......................................................................................................9

V. GENERAL PERMIT REQUIREMENTS ..............................................................................................16

VI. ATTACHMENTS ..............................................................................................................................20

   ATTACHMENT A ..................................................................................................................................21
   Fugitive Emission Observations ............................................................................................................21

   ATTACHMENT B ..................................................................................................................................22
   Inspection/Maintenance/Repair/Malfunction Log ..................................................................................22

   ATTACHMENT C ..................................................................................................................................23
   Plantwide NOx Compliance Worksheet .................................................................................................23

   ATTACHMENT D ..................................................................................................................................24
   Construction Permit No. 072000-009 NOx Compliance Worksheet .......................................................24
I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION

Southern Star Central Gas Pipeline, Inc.’s Peculiar Compressor Station is a natural gas transmission station. The transmission station consists of two large reciprocating engines, a large turbine, an emergency generator, and a small boiler. The facility is a synthetic minor source of Nitrogen Oxides (NOx).

<table>
<thead>
<tr>
<th>Year</th>
<th>Particulate Matter ≤ Ten Microns (PM₁₀)</th>
<th>Sulfur Oxides (SO₃)</th>
<th>Nitrogen Oxides (NOₓ)</th>
<th>Volatile Organic Compounds (VOC)</th>
<th>Carbon Monoxide (CO)</th>
<th>Hazardous Air Pollutants (HAPs)</th>
<th>Particulate Matter ≤ 2.5 Microns (PM₂.₅)</th>
</tr>
</thead>
<tbody>
<tr>
<td>2009</td>
<td>0.60</td>
<td>0.02</td>
<td>38.28</td>
<td>1.40</td>
<td>5.02</td>
<td>0.84</td>
<td>0.57</td>
</tr>
<tr>
<td>2008</td>
<td>0.79</td>
<td>-</td>
<td>50.00</td>
<td>1.82</td>
<td>6.58</td>
<td>1.12</td>
<td>0.74</td>
</tr>
<tr>
<td>2007</td>
<td>0.59</td>
<td>-</td>
<td>46.74</td>
<td>1.71</td>
<td>6.08</td>
<td>1.10</td>
<td>0.55</td>
</tr>
<tr>
<td>2006</td>
<td>0.27</td>
<td>0.0006</td>
<td>21.93</td>
<td>0.81</td>
<td>2.89</td>
<td>0.38</td>
<td>0.27</td>
</tr>
<tr>
<td>2005</td>
<td>0.32</td>
<td>0.002</td>
<td>25.01</td>
<td>0.92</td>
<td>3.27</td>
<td>0.58</td>
<td>0.30</td>
</tr>
</tbody>
</table>

EMISSION UNITS WITH LIMITATIONS

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

<table>
<thead>
<tr>
<th>Emission Unit #</th>
<th>Description of Emission Unit</th>
</tr>
</thead>
<tbody>
<tr>
<td>E01</td>
<td>Reciprocating Natural Gas Engine - 2000 HP</td>
</tr>
<tr>
<td>E02</td>
<td>Reciprocating Natural Gas Engine - 2000 HP</td>
</tr>
<tr>
<td>E03</td>
<td>2.4 MMBtu/hr Boiler – Natural Gas</td>
</tr>
<tr>
<td>E05</td>
<td>Natural Gas Turbine – 1535 BHP</td>
</tr>
</tbody>
</table>

EMISSION UNITS WITHOUT LIMITATIONS

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

<table>
<thead>
<tr>
<th>Description of Emission Source</th>
</tr>
</thead>
<tbody>
<tr>
<td>E04</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 on the date of permit issuance.

PERMIT CONDITION PW001

10 CSR 10-6.065(2)(C) and 10 CSR 10-6.065(5)(A) Voluntary Limitation(s)

Emission Limitation:
The permittee shall emit less than 100 tons of Nitrogen Oxides (NO\textsubscript{x}) per consecutive 12-month period from the entire installation.

Monitoring/Record Keeping:
1. The permittee shall maintain an accurate record of monthly hourly usage for all NO\textsubscript{x} emission units.
2. The monthly emissions of nitrogen oxides for each emission unit shall be calculated, using the monthly hourly usage and the emission unit’s NO\textsubscript{x} emission rate. Attachment C or an equivalent form generated by the permittee may be used.
3. The permittee shall calculate their annual emission of nitrogen oxides by summing the monthly emissions of each emission unit for the last twelve months. The annual emission will be calculated each month using the most recent twelve months worth of monthly emission totals.
4. The permittee shall maintain a maintenance log noting all inspections, malfunctions, and repairs using Attachment B or an equivalent form generated by the permittee.
5. All records shall be kept for no less than five years and be made available immediately to any Missouri Department of Natural Resources’ personnel upon request.

Reporting:
1. If at any time the yearly emission limit of 100 tons should be exceeded or a malfunction occur which could possibly cause exceedance the permittee shall report to the Air Pollution Control Program’s Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after the exceedance.
2. The permittee shall report any deviations from the emission limitation, monitoring/recordkeeping, and reporting requirements of this permit condition in the annual monitoring report and annual compliance certification required by Section V of this permit.
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 on the date of permit issuance.

PERMIT CONDITION 001
10 CSR 10-6.060 Construction Permits Required
Construction Permit No. 072000-009, Issued June 19, 2000

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Description</th>
<th>Manufacturer/Model No.</th>
<th>Construction /Modification Date</th>
<th>Stack No.</th>
</tr>
</thead>
<tbody>
<tr>
<td>E01</td>
<td>Reciprocating Natural Gas Engine - 2000 HP</td>
<td>Cooper-Bessemer GMVH-10C2</td>
<td>May 2001</td>
<td>S01</td>
</tr>
<tr>
<td>E02</td>
<td>Reciprocating Natural Gas Engine - 2000 HP</td>
<td>Cooper-Bessemer GMVH-10C2</td>
<td>May 2001</td>
<td>S02</td>
</tr>
<tr>
<td>E05</td>
<td>Natural Gas Turbine – 1535 BHP</td>
<td>Solar Saturn 20-T1600</td>
<td>May 2001</td>
<td>S04</td>
</tr>
</tbody>
</table>

Emission Limitation:
1. Special Condition No. I.A: The permittee shall emit no more than 98 tons of nitrogen oxides (NOx) per year from E01, E02, and E05 combined. The permittee shall demonstrate compliance with this limitation on an hourly basis by monitoring and controlling engine parameters. Adhering to the following control scheme will ensure that the emission rate from E01, E02, and E05 combined does not exceed 22.4 pounds of NOx per hour.
   a) Special Condition No. I.A.1: Mode 1 – Only one (1) reciprocating engine (E01 or E02) operating with or without the turbine (E05): One (1) reciprocating engine and the turbine can operate anywhere within their respective operating envelopes. Worst-case hourly NOx emission from one (1) reciprocating engine and the turbine are less than 22.4 pounds per hour.
   b) Special Condition No. I.A.2: Mode 2 – Both reciprocating engines (E01 and E02) operating without the turbine (E05): Each reciprocating engine can operate at any engine loading as long as the engine speed is not less than 285 revolutions per minute (rpm). If an engine is operated at less than 285 rpm, then engine loading must be limited to no more than 98% torque. Worst-case hourly NOx emissions from both reciprocating engines operating simultaneously without the turbine, when controlled in this manner, are less than 22.4 pounds per hour.
   c) Special Condition No. I.A.3: Mode 3 – Both reciprocating engines (E01 and E02) and the turbine (E05) operating: The turbine can operate anywhere within its operating envelope, but each reciprocating engine must operate in the lower right portion of the NOx emission chart included in Attachment E. This chart indicates that engine speed/engine loading configurations must be limited as follows:

<table>
<thead>
<tr>
<th>Engine Speed (rpm)</th>
<th>Engine Load (% torque)</th>
</tr>
</thead>
<tbody>
<tr>
<td>330</td>
<td>100</td>
</tr>
<tr>
<td>315</td>
<td>98</td>
</tr>
<tr>
<td>300</td>
<td>94</td>
</tr>
<tr>
<td>290</td>
<td>91</td>
</tr>
<tr>
<td>280</td>
<td>89</td>
</tr>
</tbody>
</table>

Worst-case hourly NOx emissions when both reciprocating engines and the turbine are operating simultaneously, when controlled in this manner, are less than 22.4 pounds per hour.
**Operational Limitations:**

1. Special Condition No. III.A: The permittee shall only use pipeline grade natural gas in E01, E02, and E05.

2. Special Condition No. III.B: The permittee shall maintain the reciprocating engine loading between 60-100% torque and speed between 280-330 rpm, except during periods of startup and shutdown. The permittee shall maintain the turbine engine loading between 60-100% torque except during periods of startup and shutdown.

3. Special Condition No. III.C: The permittee shall operate E01, E02, and E05 within the range of the engine parameters as measured during the initial performance test, except for engine parameters affected by ambient or pipeline conditions.

4. The permittee shall properly maintain and operate the emission units.

**Monitoring/Testing:**

1. Special Condition No. IV.A: The permittee shall conduct routine performance testing of E01, E02, and E05 to verify that the NOx emission limitation is not exceeded. This routine performance testing shall be conducted semiannually. This testing is only required if the equipment was operated more than 240 hours during the preceding 6 month period. This testing may be conducted similar to the initial performance testing or by using a portable test analyzer. The testing shall be conducted at the equipments current operating conditions.

2. Special Condition No. I.C.3: The permittee shall prearrange the date of the performance testing with the APCP a minimum of thirty (30) days prior to the proposed test date.

**Recordkeeping:**

1. Special Condition No. I.B: The permittee shall use Attachment D or an equivalent form generated by the permittee to record the following data once every hour to demonstrate compliance with the NOx emission limitation:
   a) The identity of all engines operating at that instant; and
   b) The engine load (in % torque) and engine speed (in rpm) for each reciprocating engine.

   Compliance will be determined by comparing the data outlined above with the requirements of the appropriate operating mode as outlined with the NOx emission limitation. The permittee shall maintain all records required by this permit for not less than five (5) years and shall make them available immediately to any Missouri Department of Natural Resources’ (MDNR) personnel upon request.

2. The permittee shall maintain a maintenance log noting all inspections, malfunctions, and repairs using Attachment B or an equivalent form generated by the permittee.

**Reporting:**

1. Special Condition No. I.C.4: The permittee shall submit two (2) copies of each performance test report to the Director of the Air Pollution Control Program within 30 days after completion of the required performance testing. The report shall include legible copies of the raw data sheets, analytical instrument laboratory data, and complete sample calculations from the required EPA Method for at least one (1) sample run. The test report shall fully account for all operational and emission parameters addressed by this construction permit as well as in any other applicable state and federal regulation.

2. Special Condition No. I.C.5: The permittee shall submit a construction permit amendment within 60 days of submitting a performance test which indicates NOx emission factors greater than the NOx...
emission factors used in Attachment E. The permittee shall also submit a construction permit amendment if a performance test indicates CO and/or VOC emission factors are substantially higher than the emission factors listed within Attachment E.

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

<table>
<thead>
<tr>
<th>PERMIT CONDITION 002</th>
</tr>
</thead>
<tbody>
<tr>
<td>10 CSR 10-6.070 New Source Performance Regulations</td>
</tr>
<tr>
<td>40 CFR Part 60, Subpart GG – Standards of Performance for Stationary Gas Turbines</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Description</th>
<th>Manufacturer/Model No.</th>
<th>Construction Date</th>
<th>Stack No.</th>
</tr>
</thead>
<tbody>
<tr>
<td>E05</td>
<td>Natural Gas Turbine – 1535 BHP</td>
<td>Solar Saturn 20-T1600</td>
<td>May 2001</td>
<td>S04</td>
</tr>
</tbody>
</table>

**Standards:**

1. No owner or operator subject to the provisions of this subpart shall cause to be discharged into the atmosphere from any stationary gas turbine, any gases which contain nitrogen oxides in excess of 150 ppmvd corrected to 15% O₂ at ISO standard conditions. [§60.332(a)(2)]
   a) Stationary gas turbines with a heat input greater than or equal to 10.7 gigajoules per hour (10 million Btu/hour) when fired with natural gas are exempt from paragraph (a)(2) of this section when being fired with an emergency fuel. [§60.332(k)]
   i) Emergency fuel. Each period during which an exemption provided in §60.332(k) is in effect shall be included in the report required in §60.7(c). For each period, the type, reasons, and duration of the firing of the emergency fuel shall be reported. [§60.334(j)(4)]

2. No owner or operator subject to the provisions of this subpart shall burn in any stationary gas turbine any fuel which contains total sulfur in excess of 0.8 percent by weight (8000 ppmw). [§60.333(b)]

**Monitoring/Testing:**

1. For any turbine that commenced construction, reconstruction or modification after October 3, 1977, but before July 8, 2004, and which does not use steam or water injection to control NOₓ emissions, if the owner or operator has previously submitted and received EPA, State, or local permitting authority approval of a procedure for monitoring compliance with the applicable NOₓ emission limit under §60.332, that approved procedure may continue to be used: [§60.334(c)]
   a) The permittee shall demonstrate compliance with the NOₓ emission limitation of NSPS GG by performing semiannual performance testing described within and required by Special Condition IV.A of Construction Permit No. 072000-009.

2. The owner or operator may elect not to monitor the total sulfur content of the gaseous fuel combusted in the turbine, if the gaseous fuel is demonstrated to meet the definition of natural gas in §60.331(u). The owner or operator shall use one of the following sources of information to make the required demonstration: [§60.334(h)(3)]
   a) The gas quality characteristics in a current, valid purchase contract, tariff sheet or transportation contract for the gaseous fuel, specifying that the maximum total sulfur content of the fuel is 20.0 grains/100 scf or less. [§60.334(h)(3)(i)]

**Recordkeeping:**

1. The permittee shall maintain a current valid tariff sheet documenting the sulfur content of the natural gas.
2. The permittee shall maintain a copy of the most recent performance testing to demonstrate compliance with the nitrogen oxides emission limitation.

3. Maintain a maintenance log noting all inspections, malfunctions, and repairs using Attachment B 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.

**Reporting:**

1. The permittee shall report to the Air Pollution Control Program’s Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than thirty (30) days after the completion date of a performance test which shows NOx emissions in excess of the limitation.

2. The permittee shall report any deviations from the emission limitation, operational limitation, monitoring/recordkeeping, and reporting requirements of this permit condition in the annual monitoring report and annual compliance certification required by Section V of this permit.
IV. Core Permit Requirements

The installation shall comply with each of the following requirements. Consult the appropriate sections in the Code of Federal Regulations (CFR), 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 on the date of permit issuance. The following is only an excerpt from the regulation or code, and is provided for summary purposes only

<table>
<thead>
<tr>
<th>10 CSR 10-6.045 Open Burning Requirements</th>
</tr>
</thead>
<tbody>
<tr>
<td>(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.</td>
</tr>
<tr>
<td>(2) Refer to the regulation for a complete list of allowances. The following is a listing of exceptions to the allowances:</td>
</tr>
<tr>
<td>(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:</td>
</tr>
<tr>
<td>1. 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;</td>
</tr>
<tr>
<td>(B) Yard waste, with the following exceptions:</td>
</tr>
<tr>
<td>1. Kansas City metropolitan area. The open burning of trees, tree leaves, brush or any other type of vegetation shall require an open burning permit;</td>
</tr>
<tr>
<td>(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.</td>
</tr>
<tr>
<td>(4) Peculiar Compressor Station 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 Peculiar Compressor Station fails to comply with the provisions or any condition of the open burning permit.</td>
</tr>
<tr>
<td>(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.</td>
</tr>
</tbody>
</table>
| (5) Reporting and Record Keeping. 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.

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(5)(B)1.A(III)] The permittee shall retain the most current operating permit issued to this installation on-site. [10 CSR 10-6.065, §(5)(C)(1) and §(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, §(5)(C)(1) and §(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 complete and submit an Emission Inventory Questionnaire (EIQ) in accordance with the requirements outlined in this rule.
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 Inventory Questionnaire (EIQ) form or equivalent approved by the Director.
6) The permittee shall complete required reports on state supplied EIQ forms or in a form satisfactory to the Director and the reports shall be submitted to the Director by June 1 after the end of each reporting period.
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.

**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.

4) If at the time of issuance of this operating permit the permittee has already advanced to monitoring every two or to monitoring monthly the permittee may continue from that point forward in the monitoring schedule. Should a violation be noted the permittee shall immediately revert to weekly monitoring.

**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 the visible emissions were normal for the installation.
3) Whether equipment malfunctions contributed to an exceedance.
4) 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 10-2.070 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.

**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.

**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

### 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, §(5)(E)2 and §(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, §(5)(C)1 and §(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’s Enforcement Section, P. O. Box 176, Jefferson City, MO 65102.
   b) The permittee shall submit a report of all required monitoring by:
      i) April 1st for monitoring which covers the January through December time period.
      ii) Exception. Monitoring requirements which require reporting more frequently than 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.
   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 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 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.

<table>
<thead>
<tr>
<th>10 CSR 10-6.065 §(5)(C)1 and §(6)(C)1.D  Risk Management Plan Under Section 112(r)</th>
</tr>
</thead>
</table>
| 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. |

<table>
<thead>
<tr>
<th>10 CSR 10-6.065(5)(C)1.A  General Requirements</th>
</tr>
</thead>
<tbody>
<tr>
<td>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.</td>
</tr>
<tr>
<td>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</td>
</tr>
<tr>
<td>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.</td>
</tr>
<tr>
<td>4) This permit does not convey any property rights of any sort, nor grant any exclusive privilege.</td>
</tr>
<tr>
<td>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 under this rule.</td>
</tr>
<tr>
<td>6) Failure to comply with the limitations and conditions that qualify the installation for an Intermediate permit make the installation subject to the provisions of 10 CSR 10-6.065(6) and enforcement action for operating without a valid part 70 operating permit.</td>
</tr>
</tbody>
</table>
10 CSR 10-6.065(5)(C)1.C  Reasonably Anticipated Operating Scenarios

None.

10 CSR 10-6.065, §(5)(B)4; §(5)(C)1, §(6)(C)3.B; and §(6)(C)3.D; and §(5)(C)3 and §(6)(C)3.E.(I) – (III) and (V) – (VI)  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 the Air Pollution Control Program’s Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and exceedances 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, §(5)(C)1 and §(6)(C)7 Emergency Provisions

1) An emergency or upset as defined in 10 CSR 10-6.065(6)(C)7 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(5)(C)5 Off-Permit Changes

1) Except as noted below, the permittee may make any change in its permitted installation’s operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. 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 a Title I modification; Please Note: Changes at the installation which affect the emission limitation(s) classifying the installation as an intermediate source (add additional equipment to the record keeping requirements, increase the emissions above major source level) do not qualify for off-permit changes.
   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, 901 North 5th Street, Kansas City, KS 66101, no later than the next annual emissions report. 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; and
   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.

10 CSR 10-6.020(2)(R)12 Responsible Official

The application utilized in the preparation of this permit was signed by Mr. Robert S. Bahnick, Senior Vice President - Operations & Technical Services. 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 §(5)(E)4 and §(6)(E)6.A(III)(a)-(c) Reopening-Permit for Cause

This permit may be reopened for cause if:

1) The Missouri Department of Natural Resources (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,

2) 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,

3) The Missouri Department of Natural Resources or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.


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>Cause</th>
<th>Corrective Action</th>
<th>Initial</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Beyond Boundary</td>
<td>Less Than Normal</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>No</td>
<td>Yes</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Less Than Normal</td>
<td>Normal</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Normal</td>
<td>Greater Than Normal</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
### Attachment B
Inspection/Maintenance/Repair/Malfunction Log

Emission Unit # or CVM #

<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>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
ATTACHMENT C
Plantwide NOₓ Compliance Worksheet

\[
\text{NOₓ Emission Rate (tons/month)} = \text{Monthly Usage} \times \text{NOₓ Emission Factor} \times 0.0005 \text{tons/lb}
\]

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Description</th>
<th>Monthly Usage (hours)</th>
<th>NOₓ Emission Rate (lbs/hr)</th>
<th>NOₓ Emission Rate (tons/month)</th>
</tr>
</thead>
<tbody>
<tr>
<td>E01 and E02</td>
<td>Reciprocating Engines - 2000 HP each</td>
<td>7.66</td>
<td></td>
<td></td>
</tr>
<tr>
<td>E03</td>
<td>2.4 MMBtu/hr Boiler – Natural Gas</td>
<td></td>
<td>0.23</td>
<td></td>
</tr>
<tr>
<td>E04</td>
<td>Emergency Generator</td>
<td></td>
<td>12.65</td>
<td></td>
</tr>
<tr>
<td>E05</td>
<td>Natural Gas Turbine - 1535 BHP</td>
<td></td>
<td>6.88</td>
<td></td>
</tr>
</tbody>
</table>

\[
\text{Monthly NOₓ Emissions (tons/month)} = \sum \text{NOₓ Emission Rates (tons/month)}
\]

\[
\text{Annual NOₓ Emissions (tons/yr)} = \sum \text{last 12 months Monthly NOₓ Emissions (tons/month)}
\]

<table>
<thead>
<tr>
<th>Month and Year</th>
<th>Annual Emissions for the last 12 months (tons/yr)</th>
<th>Month and Year</th>
<th>Annual Emissions for the last 12 months (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Note: An Annual Emission of less than 100 tons demonstrates compliance.
ATTACHMENT D
Construction Permit No. 072000-009 NO\textsubscript{x} Compliance Worksheet

This sheet covers the period from ______________ to ______________.

<table>
<thead>
<tr>
<th>Date</th>
<th>Hour</th>
<th>Engine #1 (E01) Operating Conditions</th>
<th>Engine #2 (E02) Operating Conditions</th>
<th>Turbine (E04)</th>
<th>Operating Mode</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Speed (rpm)</td>
<td>Torque (%)</td>
<td>Speed (rpm)</td>
<td>Torque (%)</td>
</tr>
<tr>
<td>Column 1</td>
<td>Column 2</td>
<td>Column 3</td>
<td>Column 4</td>
<td>Column 5</td>
<td>Column 6</td>
</tr>
</tbody>
</table>

Column 1: Date of measurements.
Column 2: Time of the measurements on the 24-hour clock (e.g., denote 1 p.m. as 1300).
Column 3: Engine speed (in rpm) for Engine #1 at the time of the measurements.
Column 4: Engine torque (in %) for Engine #1 at the time of the measurements.
Column 5: Engine speed (in rpm) for Engine #2 at the time of the measurements.
Column 6: Engine torque (in %) for Engine #2 at the time of the measurements.
Column 7: The operating rate (in brake-horsepower) for the turbine at the time of the measurements.
Column 8: The required operating mode for the operating conditions at the time of the measurements.

Reciprocating Engine NO\textsubscript{x} Emission Factors in pounds per hour at Varying Engine Loading and Engine Speeds

<table>
<thead>
<tr>
<th>Torque in %</th>
<th>Speed in rpm</th>
<th>280</th>
<th>290</th>
<th>300</th>
<th>315</th>
<th>330</th>
</tr>
</thead>
<tbody>
<tr>
<td>100</td>
<td>11.75</td>
<td>10.46</td>
<td>9.34</td>
<td>7.95</td>
<td>7.50</td>
<td></td>
</tr>
<tr>
<td>95</td>
<td>9.84</td>
<td>8.83</td>
<td>7.73</td>
<td>6.72</td>
<td>5.95</td>
<td></td>
</tr>
<tr>
<td>94</td>
<td>9.53</td>
<td>8.52</td>
<td>7.54</td>
<td>6.57</td>
<td>5.80</td>
<td></td>
</tr>
<tr>
<td>91</td>
<td>8.37</td>
<td>7.58</td>
<td>6.57</td>
<td>5.78</td>
<td>5.18</td>
<td></td>
</tr>
<tr>
<td>90</td>
<td>8.08</td>
<td>7.29</td>
<td>6.39</td>
<td>5.64</td>
<td>5.00</td>
<td></td>
</tr>
<tr>
<td>89</td>
<td>7.66</td>
<td>6.90</td>
<td>6.21</td>
<td>5.47</td>
<td>4.83</td>
<td></td>
</tr>
<tr>
<td>80</td>
<td>5.06</td>
<td>4.62</td>
<td>4.20</td>
<td>3.94</td>
<td>3.74</td>
<td></td>
</tr>
<tr>
<td>70</td>
<td>3.38</td>
<td>3.09</td>
<td>2.97</td>
<td>2.95</td>
<td>2.65</td>
<td></td>
</tr>
<tr>
<td>60</td>
<td>2.38</td>
<td>2.32</td>
<td>2.19</td>
<td>2.17</td>
<td>2.20</td>
<td></td>
</tr>
</tbody>
</table>

These emission estimates are based on emission factors supplied by the engine manufacturers. Both reciprocating engines are required to operated within the nonshaded regions during Operating Mode 3.

<table>
<thead>
<tr>
<th>IC Engine Emissions (lbs/hr)</th>
<th>Turbine Engine Emissions (lbs/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>CO</td>
<td>NO\textsubscript{x}</td>
</tr>
<tr>
<td>7.50</td>
<td>6.88</td>
</tr>
<tr>
<td>VOC</td>
<td>CO</td>
</tr>
<tr>
<td>2.40</td>
<td>1.90</td>
</tr>
<tr>
<td></td>
<td>VOC</td>
</tr>
<tr>
<td></td>
<td>0.55</td>
</tr>
</tbody>
</table>
STATEMENT OF BASIS

Voluntary Limitations
In order to qualify for this Intermediate State Operating Permit, the permittee has accepted voluntary, federally enforceable emission limitations. Per 10 CSR 10-6.065(5)(C)1.A.(VI), if these limitations are exceeded, the installation immediately becomes subject to 10 CSR 10-6.065(6) and enforcement action for operating without a valid part 70 operating permit. It is the permittee’s responsibility to monitor emission levels and apply for a part 70 operating permit far enough in advance to avoid this situation. This may mean applying more than eighteen months in advance of the exceedance, since it can take that long or longer to obtain a part 70 operating permit.

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) Intermediate Operating Permit Application, received December 22, 2009
2) 2009 Emissions Inventory Questionnaire
4) Construction Permit No. 072000-009

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 that the following requirements are not applicable to this installation at this time for the reasons stated.

10 CSR 10-2.040, Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating is applicable to the installation, but was not applied within this permit. The installation's total heat input (Q) in MMBtu/hr:

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Description</th>
<th>MHDR (MMBtu/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>E03</td>
<td>Boiler – Natural Gas</td>
<td>2.4</td>
</tr>
<tr>
<td>Total Q</td>
<td></td>
<td>2.4</td>
</tr>
</tbody>
</table>

The allowable PM emission limit for new indirect heating sources located at an installation with a heat input rate of less than ten (10) million BTUs per hour shall be 0.40 pounds per million BTUs of heat input.
The emission factor for the boiler was taken from FIRE. The emission unit is in compliance with the emission limitation without the aid of a control device, therefore, CAM is not applicable. The emission

10 CSR 10-6.260, *Restriction of Emission of Sulfur Compounds* is not applicable because all of the emission sources at the installation are combustion equipment burning natural gas. [10 CSR 10-6.260(1)(A)2]

10 CSR 10-6.390, *Control of NOₓ Emissions From Large Stationary Internal Combustion Engines* is not applicable because the installation is located in Cass county. [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.
1) E03, E04, and E05 each have the potential to emit less than 0.5 lbs of PM per hour and are exempt per 10 CSR 10-6.400(1)(B)12.
2) E01 and E02 burn natural gas which is excluded from the definition of process weight in 10 CSR 10-6.400(2)(A).

**Construction Permit Revisions**
The following revisions were made to construction permits for this installation:

Construction Permit No. 072000-009:

This construction permit refers to the natural gas turbine as E04. Historically E04 has referred to the natural gas emergency generator. The natural gas turbine should have been referred to as E05. From this point forward the facility shall use the following emission unit IDs:

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>E01</td>
<td>Reciprocating Natural Gas Engine - 2000 HP GMVH</td>
</tr>
<tr>
<td>E02</td>
<td>Reciprocating Natural Gas Engine - 2000 HP GMVH</td>
</tr>
<tr>
<td>E03</td>
<td>2.4 MMBtu/hr Boiler – Natural Gas</td>
</tr>
<tr>
<td>E04</td>
<td>Lean Burn, Turbo Natural Gas Emergency Generator</td>
</tr>
<tr>
<td>E05</td>
<td>Natural Gas Turbine</td>
</tr>
</tbody>
</table>

**New Source Performance Standards (NSPS) Applicability**

40 CFR Part 60, Subpart GG – *Standards of Performance for Stationary Gas Turbines* is applicable to E05 Natural Gas Turbine and has been applied within this permit.

40 CFR Part 60, Subpart JJJJ – *Standards of Performance for Stationary Spark Ignition Internal Combustion Engines* is not applicable to the installation. The Stationary Spark Ignition Internal Combustion Engines located at the facility (E01, E02, and E04) were constructed/modified in 2000 and 2001 prior to the earliest listed compliance date of 2007.
40 CFR Part 60, Subpart KKKK – *Standards of Performance for Stationary Combustion Turbines* is not applicable to the installation. E05 Natural Gas Turbine was constructed in 2001 prior to the February 18, 2005 compliance date within §60.4305(a).

**Maximum Available Control Technology (MACT) Applicability**

The installation is an area source for Hazardous Air Pollutants.


1) E04 as a stationary RICE which is an existing spark ignition 4 stroke lean burn (4SLB) stationary RICE does not have to meet the requirements of this subpart. No initial notification is necessary. [§63.6590(b)(3)]

2) E01 and E02 as stationary RICE which are existing spark ignition 2 stroke lean burn (2SLB) stationary RICE do not have to meet the requirements of this subpart. No initial notification is necessary. [§63.6590(b)(3)]

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

None.

**Other Regulatory Determinations**

10 CSR 10-6.220, *Restriction of Emission of Visible Air Contaminants* is applicable to the installation, but has not been applied within this permit. All of the emission sources at the installation are PM emission sources.

- E01, E02, E04, and E05 as internal combustion engines are exempt from this regulation per 10 CSR 10-6.220(1)(A).
- E03 has the potential to emit less than 0.5 lbs of PM per hour and is assumed to always be in compliance with this regulation while being properly maintained and operated.

An updated Potential to Emit for the installation is shown below:

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Potential to Emit (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>CO</td>
<td>17.28</td>
</tr>
<tr>
<td>HAP</td>
<td>2.32</td>
</tr>
<tr>
<td>NOx</td>
<td>102.18</td>
</tr>
<tr>
<td>PM$_{10}$</td>
<td>1.58</td>
</tr>
<tr>
<td>PM$_{25}$</td>
<td>1.58</td>
</tr>
<tr>
<td>SOx</td>
<td>0.34</td>
</tr>
<tr>
<td>VOC</td>
<td>5.26</td>
</tr>
</tbody>
</table>

Note: All emission sources were evaluated at 8760 hours of uncontrolled annual operation unless otherwise noted. E01, E02, and E05 were scaled down for a maximum PTE of 98 tons/yr NOx per Construction Permit No. 072000-009 Special Condition No. I.A. E04 was evaluated at 500 hours of annual operation due to the engine’s emergency status.
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 a schedule for achieving compliance for that regulation(s).

Prepared by:

______________________________
Alana L. Rugen
Environmental Engineer