

MISSOURI
DEPARTMENT OF
NATURAL RESOURCES

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 herein.

Intermediate Operating Permit Number: OP2017-011
Expiration Date: FEB 22 2022
Installation ID: 037-0048
Project Number: 2015-02-015

Installation Name and Address

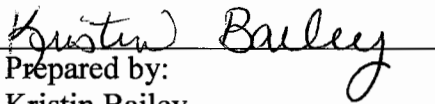
Peculiar Compressor Station
24304 South Harper Street
Peculiar, MO 64078
Cass County

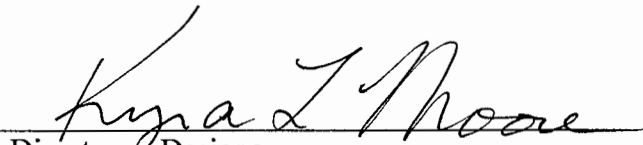
Parent Company's Name and Address

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 (NO_x). Due to the installation of the large turbine compressor engine, the facility is a named installation [10 CSR 10-6.020(3)(B), Table 2, item 27] as a stationary source category which was being regulated under section 111 or 112 of the Clean Air Act as of August 7, 1980.


Prepared by:
Kristin Bailey
Operating Permit Unit


Director of Designee
Department of Natural Resources

FEB 22 2017

Effective Date

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I. Installation Equipment Listing

EMISSION UNITS WITH LIMITATIONS

The following list provides a description of the equipment at this installation which emits air pollutants and identified as having unit-specific emission limitations. The plant wide conditions apply to all emission units at this installation.

<u>Emission Unit #</u>	<u>Description of Emission Unit</u>
EP-01	Reciprocating Natural Gas Engine - 2000 HP
EP-02	Reciprocating Natural Gas Engine - 2000 HP
EP-03	2.4 MMBtu/hr – Natural Gas – Engine Water Heating Boiler, Installed 1999
EP-04	Lean Burn, Turbo Natural Gas Emergency Generator
EP-05	Natural Gas Turbine – 1535 BHP

EMISSION UNITS WITHOUT SPECIFIC LIMITATIONS

The following list provides a description of the equipment, which does not have unit specific limitations at the time of permit issuance. The plant wide conditions apply to all emission units at this installation.

<u>Emission Unit #</u>	<u>Description of Emission Unit</u>
EP-06	All natural gas fugitive emissions

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. The plant wide conditions apply to all emission units at this installation. All emission units are listed in Section I under Emission Units with Limitations and Emission Units without Specific Limitations.

PERMIT CONDITION PW001

10 CSR 10-6.020(2)(I)23. and 10 CSR 10-6.065(5)(C)2. Voluntary Limitation(s)

Emission Limitation:

The permittee shall emit less than 100 tons of Nitrogen Oxides (NO_x) per consecutive 12-month period from the entire installation.

Monitoring/Record Keeping:

- 1) The permittee shall maintain an accurate record of hourly usage for all NO_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_x emission rate. Attachment B or an equivalent form generated by the permittee may be used.
- 3) The permittee shall calculate annual emissions of nitrogen oxides by summing the monthly emissions for each emission unit over each twelve month rolling period.
- 4) The permittee shall maintain a maintenance log noting all inspections, malfunctions, and repairs using Attachment A 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 Compliance/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				
Emission Unit	Description	Manufacturer/Model No.	Construction /Modification Date	Stack No.
EP-01	Reciprocating Natural Gas Engine - 2000 HP	Cooper-Bessemer GMVH-10C2	May 2001	S01
EP-02	Reciprocating Natural Gas Engine - 2000 HP	Cooper-Bessemer GMVH-10C2	May 2001	S02
EP-05	Natural Gas Turbine – 1535 BHP	Solar Saturn 20-T1600	May 2001	S04

Emission Limitation:

- 1) The permittee shall emit no more than 98 tons of nitrogen oxides (NO_x) per year from EP-01, EP-02, and EP-05 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 does not exceed the limit of 22.4 pounds of NO_x per hour. [Special Condition I.A.]
 - a) Mode 1 – Only one (1) reciprocating engine (EP-01 or EP-02) operating with or without the turbine (EP-05): One (1) reciprocating engine and the turbine can operate anyplace within their respective operating envelopes. Worst-case hourly NO_x emission from one (1) reciprocating engine and the turbine are less than 22.4 pounds per hour. [Special Condition I.A.1.]
 - b) Mode 2 – Both reciprocating engines (EP-01 and EP-02) operating without the turbine (EP-05): 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 NO_x emissions from both reciprocating engines operating simultaneously without the turbine, when controlled in this manner, are less than 22.4 pounds per hour. [Special Condition I.A.2.]
 - c) Mode 3 – Both reciprocating engines (EP-01 and EP-02) and the turbine (EP-05) operating: The turbine can operate anyplace within its operating envelope, but each reciprocating engine must operate in the lower right portion of the NO_x emission chart included in Attachment C. This chart indicates that engine speed/engine loading configurations must be limited as follows: [Special Condition I.A.3.]

Engine Speed (rpm)	Engine Load (% torque)
330	100
315	98
300	94
290	91
280	89

Worst-case hourly NO_x 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) The permittee shall only use pipeline grade natural gas in EP-01, EP-02, and EP-05. [Special Condition III.A.]
- 2) 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. [Special Condition III.B.]
- 3) The permittee shall operate EP-01, EP-02, and EP-05 within the range of the engine parameters as measured during the initial performance test, except for engine parameters affected by ambient or pipeline conditions. [Special Condition III.C.]
- 4) The permittee shall properly maintain and operate the emission units.

Monitoring/Testing:

- 1) The permittee shall conduct routine performance testing of EP-01, EP-02, and EP-05 to verify that the NO_x emission limitation is not exceeded. This routine performance testing shall be conducted semiannually. This testing is only required for a given unit if it 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 equipment's current operating conditions. [Special Condition IV.A.]
- 2) 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. [Special Condition I.C.3.]

Recordkeeping:

- 1) The permittee shall use Attachment C or an equivalent form generated by the permittee to record the following data once every hour to demonstrate compliance with the NO_x emission limitation: [Special Condition I.B.]
 - 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 NO_x emission limitation.
- 2) The permittee shall maintain a maintenance log noting all inspections, malfunctions, and repairs using Attachment A or an equivalent form generated by the permittee.
- 3) 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) The permittee shall submit two (2) hard copies and/or an electronic copy of each performance test report to the Director of the Air Pollution Control Program within 60 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. [Special Condition I.C.4.]

- 2) The permittee shall submit a construction permit amendment within 60 days of submitting a performance test which indicates NO_x emission factors greater than the NO_x emission factors used in Attachment C. 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 C. [Special Condition I.C.5.]
- 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.

PERMIT CONDITION 002				
10 CSR 10-6.070 New Source Performance Regulations				
40 CFR Part 60, Subpart GG – Standards of Performance for Stationary Gas Turbines				
Emission Unit	Description	Manufacturer/Model No.	Construction Date	Stack No.
EP-05	Natural Gas Turbine – 1535 BHP	Solar Saturn 20-T1600	May 2001	S04

Standards:

- 1) The permittee shall not discharge any gasses which contain nitrogen oxides in excess of 150 ppmvd corrected to 15% O₂ at ISO standard conditions into the atmosphere from any stationary gas turbine. [§60.332(a)(2)]
- 2) The permittee shall not 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) In accordance with §60.334(c) the permittee shall demonstrate compliance with the NO_x emission limitation by performing semiannual performance testing as required by Special Condition IV.A of Construction Permit No. 072000-009.
- 2) The permittee shall demonstrate the fuel meets the definition of natural gas in §60.331(u) by documenting 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) The permittee shall maintain a maintenance log noting all inspections, malfunctions, and repairs using Attachment A or an equivalent form generated by the permittee.
- 4) 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) The permittee shall report to the Air Pollution Control Program’s Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than thirty (30) days after the completion date of a performance test which shows NO_x 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.

PERMIT CONDITION 003				
10 CSR 10-6.075 Maximum Achievable Control Technology Regulations				
40 CFR Part 63, Subpart ZZZZ – National Emission Standard for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines				
Emission Unit	Description	Manufacturer/Model No.	Construction /Modification Date	Stack No.
EP-01	RICE SI Natural Gas Engine – 2SLB -2000 HP	Cooper-Bessemer GMVH-10C2	May 2001	S01
EP-02	RICE SI Natural Gas Engine – 2SLB -2000 HP	Cooper-Bessemer GMVH-10C2	May 2001	S02

Operational Requirements:

- 1) The permittee shall minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes. [§63.6625(h)].
- 2) The permittee must meet the following requirements from Table 2d for existing non-emergency non-black start 2SLB RICE: [Table 2d, Item 6, to Subpart ZZZZ of Part 63]
 - a) The permittee shall change the oil and filter every 4,320 hours of operation or annually, whichever comes first. The permittee has the option to utilize an oil analysis program as described in §63.6625(i) or (j) in order to extend the specified oil change requirement.
 - b) The permittee shall inspect spark plugs every 4,320 hours of operation or annually, whichever comes first, and replace as necessary; and
 - c) The permittee shall inspect all hoses and belts every 4,320 hours of operation or annually, whichever comes first, and replace as necessary.
- 3) The permittee shall operate and maintain the stationary RICE according to the manufacturer's emission-related written instructions in a manner consistent with good air pollution control practice for minimizing emissions. [§63.6605(b)]

Monitoring/Reporting/Recordkeeping:

- 1) The permittee shall keep records of the maintenance conducted on the engines. [§63.6655(e)]
- 2) 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.
- 3) 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 compliance certification required by Section V of this permit.
- 4) The permittee shall submit reports to EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219.

PERMIT CONDITION 004

10 CSR 10-6.075 Maximum Achievable Control Technology Regulations
40 CFR Part 63, Subpart ZZZZ – National Emission Standard for Hazardous Air Pollutants for
Stationary Reciprocating Internal Combustion Engines

Emission Unit	Description	Manufacturer/Model No.	Construction /Modification Date
EP-04	Lean Burn, Turbo Natural Gas Emergency Generator	Waukesha VGF18GL	October 2000

Operational Requirements:

- 1) The permittee must be in compliance with the applicable requirements of MACT ZZZZ at all times. [§63.6605(a)]
- 2) At all times, the permittee must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require the permittee to make any further efforts to reduce emissions if levels required by this standard have been achieved. [§63.6605(b)]
- 3) The permittee must have a non-resettable hour meter installed on the emergency generator if one hasn't already been installed. [63.6625(f)]

Work Practice Standards:

- 1) For each emergency RICE, the permittee must meet the following requirement (*except during periods of startup*); [Table 2d, Item 5, to Subpart ZZZZ of Part 63]
 - a) Change oil and filter every 500 hours of operation or annually, whichever comes first; The permittee has the option to utilize an oil analysis program as described in §63.6625(i) or (j) in order to extend the specified oil change requirement.
 - b) Inspect spark plugs every 1000 hours of operation or annually, whichever comes first, and replace as necessary; and
 - c) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.
- 2) During periods of startup the permittee must minimize the engine's time spent at idle and minimize the engine's startup time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the non-startup emission limitations apply.
- 3) The permittee shall operate the emergency stationary RICE according to the requirements in §63.6640(f)(1) through (4). In order for the engine to be considered an emergency stationary RICE under MACT ZZZZ, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year, as described in §63.6640(f)(1) through (4), is prohibited. If the permittee does not operate the engine according to the requirements in §63.6640(f)(1) through (4), the engine will not be considered an emergency engine under MACT ZZZZ and shall meet all requirements for non-emergency engines. [§63.6640(f)]
 - a) There is no time limit on the use of emergency stationary RICE in emergency situations. [§63.6640(f)(1)]
 - b) The permittee may operate the emergency stationary RICE for any combination of the purposes specified in §63.6640(f)(2)(i) for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by §63.6640(f)(4) counts as part of the 100 hours per calendar year allowed by this paragraph (f). [§63.6640(f)(2)]
 - i) Emergency stationary RICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the

manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine.

The permittee may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the permittee maintains records indicating that federal, state, or local standards require maintenance and testing of emergency RICE beyond 100 hours per calendar year. [§63.6640(f)(2)(i)]

- c) Emergency stationary RICE located at area sources of HAP may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in §63.6640(f)(2). Except as provided in §63.6640(f)(4)(ii), the 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

[§63.6640(f)(4)]

- i) The 50 hours per year for non-emergency situations can be used to supply power as part of a financial arrangement with another entity if all of the following conditions are met:

[§63.6640(f)(4)(ii)]

- (1) The engine is dispatched by the local balancing authority or local transmission and distribution system operator. [§63.6640(f)(4)(ii)(A)]
- (2) The dispatch is intended to mitigate local transmission and/or distribution limitations so as to avert potential voltage collapse or line overloads that could lead to the interruption of power supply in a local area or region. [§63.6640(f)(4)(ii)(B)]
- (3) The dispatch follows reliability, emergency operation or similar protocols that follow specific NERC, regional, state, public utility commission or local standards or guidelines. [§63.6640(f)(4)(ii)(C)]
- (4) The power is provided only to the facility itself or to support the local transmission and distribution system. [§63.6640(f)(4)(ii)(D)]
- (5) The permittee identifies and records the entity that dispatches the engine and the specific NERC, regional, state, public utility commission or local standards or guidelines that are being followed for dispatching the engine. The local balancing authority or local transmission and distribution system operator may keep these records on behalf of the permittee. [§63.6640(f)(4)(ii)(E)]

Recordkeeping:

- 1) The permittee must keep records of all required maintenance performed on the air pollution control and monitoring equipment. [§63.6655(a)(4)]
- 2) The permittee must keep records of actions taken during periods of malfunction to minimize emissions in accordance with §63.6605(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. [§63.6655(a)(5)]
- 3) The permittee must keep records of the maintenance conducted on the stationary RICE in order to demonstrate that you operated and maintained the stationary RICE and after-treatment control device (if any) according the facility's own maintenance plan. [§63.6655(e)]
- 4) The permittee must keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The Permittee must document how many hours are spent for emergency operation; including what classified the operation as emergency and how many hours are spent for non-emergency operation. [§63.6655(f)]

- 5) If the engine is used for the purposes specified in §63.6640(f)(2)(ii) or (iii) or §63.6640(f)(4)(ii), the permittee must keep records of the notification of the emergency situation, and the date, start time, and end time of engine operation for these purposes. [§63.6655(f)]

Reporting:

- 1) 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 compliance certification required by Section V of this permit.
- 2) The permittee shall submit reports to EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219.

PERMIT CONDITION 005			
10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants			
Emission Unit	Description	Manufacturer/Model No.	Construction /Modification Date
EP-03	2.4 MMBtu/hr – Natural Gas – Water Heating Boiler	Kewanee L35-150-KX	2000

Emission Limitation:

- 1) The permittee shall not cause or permit to be discharged into the atmosphere from any source in the Kansas City Metropolitan Area, any visible emissions with an opacity greater than 20 percent.
- 2) Exception: The permittee may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than one six (6) minute period in any 60 minutes air contaminants with an opacity up to 60 percent.

Monitoring/Recordkeeping/Reporting:

None. See Statement of Basis for explanation.

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 are only excerpts from the regulation or code, and are provided for summary purposes only

10 CSR 10-6.045 Open Burning Requirements

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

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

- 1) In the event of a malfunction, which results in excess emissions that exceed one hour, the permittee shall submit to the director within two business days, in writing, the following information:
 - a) Name and location of installation;
 - b) Name and telephone number of person responsible for the installation;
 - c) Name of the person who first discovered the malfunction and precise time and date that the malfunction was discovered.
 - d) Identity of the equipment causing the excess emissions;
 - e) Time and duration of the period of excess emissions;
 - f) Cause of the excess emissions;
 - g) Air pollutants involved;
 - h) Estimate of the magnitude of the excess emissions expressed in the units of the applicable requirement and the operating data and calculations used in estimating the magnitude;
 - i) Measures taken to mitigate the extent and duration of the excess emissions; and
 - j) Measures taken to remedy the situation that caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations.
- 2) The permittee shall submit the paragraph 1 information to the director in writing at least ten days prior to any maintenance, start-up or shutdown activity which is expected to cause an excessive release of emissions that exceed one hour. If notice of the event cannot be given ten days prior to the planned occurrence, notice shall be given as soon as practicable prior to the activity.
- 3) Upon receipt of a notice of excess emissions issued by an agency holding a certificate of authority under section 643.140, RSMo, the permittee may provide information showing that the excess emissions were the consequence of a malfunction, start-up or shutdown. The information, at a minimum, should be the paragraph 1 list and shall be submitted not later than 15 days after receipt of the notice of excess emissions. Based upon information submitted by the permittee or any other pertinent information available, the director or the commission shall make a determination whether the excess emissions constitute a malfunction, start-up or shutdown and whether the nature, extent

and duration of the excess emissions warrant enforcement action under section 643.080 or 643.151, RSMo.

- 4) Nothing in this rule shall be construed to limit the authority of the director or commission to take appropriate action, under sections 643.080, 643.090 and 643.151, RSMo to enforce the provisions of the Air Conservation Law and the corresponding rule.
- 5) Compliance with this rule does not automatically absolve the permittee of liability for the excess emissions reported.

10 CSR 10-6.060 Construction Permits Required

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

10 CSR 10-6.065 Operating Permits

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

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

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.

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

- 1) The permittee shall submit a Full Emissions Report either electronically via MoEIS, which requires Form 1.0 signed by an authorized company representative, or on Emission Inventory Questionnaire (EIQ) paper forms on the frequency specified in this rule and in accordance with the requirements outlined in this rule. Alternate methods of reporting the emissions, such as spreadsheet file, can be submitted for approval by the director.
- 2) Public Availability of Emission Data and Process Information. Any information obtained pursuant to the rule(s) of the Missouri Air Conservation Commission that would not be entitled to confidential treatment under 10 CSR 10-6.210 shall be made available to any member of the public upon request.
- 3) The permittee shall submit a full EIQ for the 2017 and 2020 reporting years. In the interim years the installation may submit a Reduced Reporting Form; however, if the installation's emissions increase or decrease by more than five tons when compared to their last submitted full EIQ, the installation shall submit a full EIQ rather than a Reduced Reporting Form.
- 4) In addition to the EIQ submittal schedule outlined above, any permit issued under 10 CSR 10-6.060 section (5) or (6) triggers a requirement that a full EIQ be submitted in the first full calendar year after the permitted equipment initially operates.

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

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

10 CSR 10-6.150 Circumvention

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

10 CSR 10-6.165 Restriction of Emission of Odors

This requirement is not federally enforceable.

No person may cause, permit or allow the emission of odorous matter in concentrations and frequencies or for durations that odor can be perceived when one volume of odorous air is diluted with seven volumes of odor-free air for two separate trials not less than 15 minutes apart within the period of one hour.

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 10-6.220 Restriction of Emission of Visible Air Contaminants

Emission Limitation:

The permittee shall not cause or permit to be discharged into the atmosphere from any source not exempted under 10 CSR 10-6.220 any visible emissions in excess of the limits specified by this rule. This permit will contain the opacity limits identified (10, 20 or 40 percent) for the specific emission units.

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.

10 CSR 10-6.280 Compliance Monitoring Usage

- 1) The permittee is not prohibited from using the following in addition to any specified compliance methods for the purpose of submission of compliance certificates:
 - a) Monitoring methods outlined in 40 CFR Part 64;
 - b) Monitoring method(s) approved for the permittee pursuant to 10 CSR 10-6.065, “Operating Permits”, and incorporated into an operating permit; and
 - c) Any other monitoring methods approved by the director.
- 2) Any credible evidence may be used for the purpose of establishing whether a permittee has violated or is in violation of any such plan or other applicable requirement. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred at an installation:
 - a) Monitoring methods outlined in 40 CFR Part 64;
 - b) A monitoring method approved for the permittee pursuant to 10 CSR 10-6.065, “Operating Permits”, and incorporated into an operating permit; and
 - c) Compliance test methods specified in the rule cited as the authority for the emission limitations.
- 3) The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
 - a) Applicable monitoring or testing methods, cited in:
 - i) 10 CSR 10-6.030, “Sampling Methods for Air Pollution Sources”;
 - ii) 10 CSR 10-6.040, “Reference Methods”;
 - iii) 10 CSR 10-6.070, “New Source Performance Standards”;
 - iv) 10 CSR 10-6.080, “Emission Standards for Hazardous Air Pollutants”; or

- b) Other testing, monitoring, or information gathering methods, if approved by the director, that produce information comparable to that produced by any method listed above.

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

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

V. General Permit Requirements

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

10 CSR 10-6.065, §(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, Compliance and Enforcement Section, P. O. Box 176, Jefferson City, MO 65102.
 - b) The permittee shall submit a report of all required monitoring by:
 - i) 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. 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.

10 CSR 10-6.065 §(5)(C)1 and §(6)(C)1.D Risk Management Plan Under Section 112(r)

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

10 CSR 10-6.065(5)(C)1.A 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 under this rule.
- 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.

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, Compliance and 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
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- 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(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 contemporaneous written notice of the change to the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219. This 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)34 Responsible Official

The application utilized in the preparation of this permit was signed by Robert S. Bahnick, Vice President and Chief Operating Officer. 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) MDNR or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

10 CSR 10-6.065 §(5)(E)1.A and §(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
Construction Permit No. 072000-009 NO_x Compliance Worksheet

This sheet covers the period from _____ to _____.

Date	Hour	Engine #1 (E01) Operating Conditions		Engine #2 (E02) Operating Conditions		Turbine (E04)	Operating Mode
		Speed (rpm)	Torque (%)	Speed (rpm)	Torque (%)	Horsepower (bhp)	
Column 1	Column 2	Column 3	Column 4	Column 5	Column 6	Column 7	Column 8

- 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 _x Emission Factors in pounds per hour at Varying Engine Loading and Engine Speeds						
		Speed in rpm				
		280	290	300	315	330
Torque in %	100	11.75	10.46	9.34	7.95	7.50
	98	11.00	9.76	8.64	7.63	6.52
	95	9.84	8.83	7.73	6.72	5.95
	94	9.53	8.52	7.54	6.57	5.80
	91	8.37	7.58	6.57	5.78	5.18
	90	8.08	7.29	6.39	5.64	5.00
	89	7.66	6.90	6.21	5.47	4.83
	80	5.06	4.62	4.20	3.94	3.74
	70	3.38	3.09	2.97	2.95	2.65
	60	2.38	2.32	2.19	2.17	2.20

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

IC Engine Emissions (lbs/hr)		Turbine Engine Emissions (lbs/hr)		
CO	VOC	NO _x	CO	VOC
7.50	2.40	6.88	1.90	0.55

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.

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 (NO_x). Due to the installation of the large turbine compressor engine, the facility is a named installation [10 CSR 10-6.020(3)(B), Table 2, item 27] as a stationary source category which was being regulated under section 111 or 112 of the Clean Air Act as of August 7, 1980.

Updated Potential to Emit for the Installation and Reported Air Pollutant Emissions, tons per year

Pollutant	Potential to Emit (tons/yr) ^{1,2}	Actual 2015	Actual 2014	Actual 2013	Actual 2012	Actual 2011
CO	58.20	10.54	10.54	10.05	8.69	4.87
HAP	9.48	1.68	1.68	1.02	1.43	0.79
NO _x	< 100	7.78	7.79	75.35	65.47	36.22
PM ₁₀	6.11	1.24	1.24	1.25	1.30	0.73
PM _{2.5}	5.21	1.19	1.19	1.19	1.03	0.58
SO _x	0.02	0.00	0.00	0.00	0.00	0.00
VOC	36.09	23.27	23.27	23.91	28.01	20.11
GHG	38,769.35	NR	NR	NR	NR	NR
CO _{2e}	38,808.59	NR	NR	NR	NR	NR

¹Each emission unit was evaluated at 8,760 hours of uncontrolled annual operation unless otherwise noted and fugitive emissions are included in the potential to emit calculations. NR = Not Reported

²The emergency generator was evaluated at 500 hours of uncontrolled annual operation.

³The differences in the NO_x actuals in 2012 and 2013 are a result of over estimating the emissions. Stack testing was completed and the emissions factors obtained from the stack tests were utilized for reporting beginning in 2014, which resulted in lower actual emissions.

⁴The potential to emit for CO, NO_x, and VOC were obtained from Construction Permit 072000-009, Issued June 19, 2000.

⁵The installation is limited by Permit Condition PW1 to:

- ❖ Less than 100 tons of NO_x from the entire installation during any consecutive 12 month period.

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 February 4, 2015;
- 2) 2015 Emissions Inventory Questionnaire, received March 25, 2016;

- 3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition; and
- 4) Construction Permit 072000-009, Issued July 12, 2000

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

10 CSR 10-6.260 *Restriction of Emission of Sulfur Compounds* and 10 CSR 10-6.261 *Control of Sulfur Dioxide Emissions* are not applicable to the installation and have not been applied within this permit. All combustion units at the facility are exempt from both of these regulations per 10 CSR 10-6.260(1)(A)2 and 10 CSR 10-6.261(1)(A) as they combust exclusively pipeline grade natural gas.

10 CSR 10-6.390, *Control of NO_x 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) EP-03, EP-04, and EP-05 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) EP-01 and EP-02 burn natural gas which is excluded from the definition of process weight in 10 CSR 10-6.400(2)(A).

10 CSR 10-6.405, *Restriction of Particulate Matter Emissions From Fuel Burning Equipment Used For Indirect Heating* is applicable to the installation. As all units are fueled by natural gas, they are deemed to be in compliance per 10 CSR 10-6.405(1)(C).

Construction Permit History

Construction Permit 072000-009, Issued July 12, 2000

- ◆ This construction permit authorized retrofit of the natural gas compressors.

New Source Performance Standards (NSPS) Applicability

40 CFR Part 60, Subpart GG - *Standards of Performance for Stationary Gas Turbines* is applicable to all stationary gas turbines with a heat input at peak load equal to or greater than 10 million Btu per hour, based on the lower heating value of the fuel fired.

This rule is applicable to the installation, due to the installation of the Natural Gas Turbine, EP-05, and has been applied within this permit. See Permit Condition 002.

40 CFR Part 60, Subpart KKK - *Standards of Performance for Equipment Leaks of VOC From Onshore Natural Gas Processing Plants for Which Construction, Reconstruction, or Modification Commenced After January 20, 1984, and on or Before August 23, 2011* is applicable to a compressor station, dehydration unit, sweetening unit, underground storage tank, field gas gathering system, or liquefied natural gas unit if it is located at an onshore natural gas processing plant. If the unit is not located at the plant site, then it is exempt from the provisions of this subpart.

This rule is not applicable because this compressor station is not located at an onshore gas processing plant.

40 CFR Part 60 LLL - *Standards of Performance for SO₂ Emissions from Onshore Natural Gas Processing for Which Construction, Reconstruction, or Modification Commenced After January 20, 1984, and on or Before August 23, 2011* is applicable to the following facilities that process natural gas: each sweetening unit, and each sweetening unit followed by a sulfur recovery unit.

The rule is not applicable to this facility, as the facility is a compressor station, not a sweetening unit.

40 CFR Part 60, Subpart JJJJ – *Standards of Performance for Stationary Spark Ignition Internal Combustion Engines* is applicable to stationary spark ignition engines that were modified/constructed after June 12, 2006.

This rule is not applicable. All of the engines were constructed prior to June 12, 2006.

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

This rule is not applicable. There have been no affected sources under this subpart constructed, modified or reconstructed since August 23, 2011.

40 CFR 60, Subpart OOOOa *Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced after September 18, 2015*

This rule is not applicable. There have been no affected sources under this subpart constructed, modified or reconstructed since September 18, 2015.

Maximum Achievable Control Technology (MACT) Applicability

40 CFR Part 63, Subpart HH—*National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities* applies to facilities that process, upgrade, or store natural gas prior to the point at which natural gas enters the natural gas transmission and storage source category or is delivered to a final end user. For the purposes of this subpart, natural gas enters the natural gas transmission and storage source category after the natural gas processing plant.

This rule is not applicable to the facility as the facility transports gas after it has entered the natural gas transmission and storage source category.

40 CFR 63, Subpart HHH - *National Emission Standards for Hazardous Air Pollutants from Natural Gas Transmission and Storage Facilities* applies to owners and operators of natural gas transmission and storage facilities that transport or store natural gas prior to entering the pipeline to a local distribution company or to a final end user (if there is no local distribution company), and that are major sources of hazardous air pollutants (HAP) emissions as defined in §63.1271.

This rule is not applicable to the facility as the facility is not a major source of hazardous air pollutants.

40 CFR Part 63, Subpart ZZZZ – *National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines* applies to stationary reciprocating internal combustion engines.

This rule is applicable to the installation and has been applied. See Permit Condition 003 and 004.

40 CFR Part 63 Subpart JJJJJ- *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources* applies to industrial, commercial, or institutional boilers as defined in §63.11237 that are located at, or is part of, an area source of hazardous air pollutants (HAP).

This rule does not apply to EP-03, Engine Water Heating Boiler. The boiler is not subject to this standard as it is a natural gas fueled boiler. [§63.11195(e)]

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

None

Greenhouse Gas Emissions

Potential emissions of greenhouse gases (CO₂e) for this installation are estimated to be 38,808.59 tons, classifying the installation as a minor source of GHGs. There are no currently issued GHG regulations applicable to this installation. Missouri regulations do not require the installation to report CO₂e emissions in their Missouri Emissions Inventory Questionnaire; therefore, the installation's CO₂e emissions were not included within this permit.

Other Regulatory Determinations

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

There is no monitoring or recordkeeping required as the facility has a maximum potential to emit of particulate matter of 0.139 lbs/hr, so it is highly unlikely that they would have any visible emissions.

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

This regulation was added as a permit condition for EP-03, 2.4 MMBtu/hr – Natural Gas – Engine Water Heating Boiler, with no monitoring, recordkeeping or reporting required as EP-03 has the potential to emit less than 0.5 lbs of PM per hour. See Permit Condition 005. The stationary reciprocating internal combustion engines are exempt under 10 CSR 6.220(1)(A), and EP-05, Natural Gas Turbine is exempted under 10 CSR 6.220(1)(H).

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 APCP a schedule for achieving compliance for that regulation(s).

Response to Public Comments

Mr. Mark A. Smith, Chief of the Air Permitting and Compliance Branch of EPA Region 7 submitted one comment regarding reporting requirements on December 13, 2016.

Comment #1: Permit Condition 003 and Permit Condition 004 both incorporate the applicable requirements from 40 CFR part 63, Subpart ZZZZ – *National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*. If the Peculiar Compressor Station is an area source of hazardous air pollutants (HAPs), as indicated by the potential to emit table in the Statement of Basis, then MDNR relies on EPA for compliance management and all compliance related reporting shall be submitted to the Missouri Air Compliance Coordinator at EPA Region 7, with copies to MDNR as necessary. Therefore, the monitoring/reporting/recordkeeping requirements in Permit Condition 003; and the reporting requirement in Permit Condition 004, should be modified to reflect this reporting scenario.

Response to Comment: The Permit Conditions have been modified to reflect this reporting scenario.


Mr. Larry Molder II, P.E., Environmental Engineer with Southern Star Central Gas Pipeline, Inc. submitted two comments on December 5, 2016. The comments are addressed in the order they appeared in the e-mail.

Comment #1: Please see the insertion comment on Page 8 of 31 in the attached pdf – Permit Condition 003 (Operational Requirements; Item 2)
We would like to further clarify the engine type by including that these are 2-stroke lean-burn (2SLB), spark ignition (SI) RICE.

Response to Comment: The engine type has been further clarified buy modifying the description to include that the engines are 2SLB SI RICE.

Comment #2: Please see the highlighted comment on Page 8 of 31 in the attached pdf – These RICE engines are not compression ignition (CI) engines and are therefore not subject to Item 3 of Table 2d, as specified in this draft permit. Please insert the appropriate 2d requirement in the draft permit (Item 6).

Response to Comment: The reference was changed from Item 3 to Item 6 as requested.



Eric R. Greitens, Governor • Carol S. Comer, Acting Director

DEPARTMENT OF NATURAL RESOURCES

dnr.mo.gov

FEB 22 2017

Mr. Robert S. Bahnick
Peculiar Compressor Station
24304 South Harper Street
Peculiar, MO 64078

Re: Peculiar Compressor Station, 037-0048
Permit Number: OP2017-011

Dear Mr. Bahnick:

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

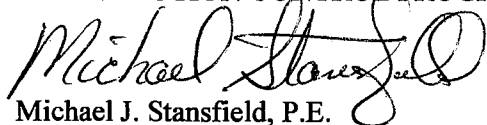
This permit may include requirements with which you may not be familiar. If you would like the department to meet with you to discuss how to understand and satisfy the requirements contained in this permit, an appointment referred to as a Compliance Assistance Visit (CAV) can be set up with you. To request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

You may appeal this permit to the Administrative Hearing Commission (AHC), P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.078.16 and 621.250.3. If you choose to appeal, you must file a petition with the AHC within thirty (30) days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If you send your appeal by registered or certified mail, we will deem it filed on the date you mailed it. If you send your appeal by a method other than registered or certified mail, we will deem it filed on the date the AHC receives it.

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

Sincerely,

AIR POLLUTION CONTROL PROGRAM



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

MJS:kbj

Enclosures

c: PAMS File: 2015-02-015



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