



Missouri Department of dnr.mo.gov
NATURAL RESOURCES
Michael L. Parson, Governor Carol S. Comer, Director

FEB 04 2020

Mr. Kerry C. Puckett
Texas Eastern - Oran
7717 Hwy 77
Oran, MO 63771

Re: Texas Eastern - Oran, 201-0099
Permit Number: 2018-05-012

Dear Mr. Puckett:

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

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

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

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

Sincerely,

AIR POLLUTION CONTROL PROGRAM

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

MJS:ST

Enclosures

c: PAMS File: 2018-05-012





PART 70 PERMIT TO OPERATE

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

Operating Permit Number: 2018-05-012
Expiration Date: FEB 04 2025
Installation ID: 201-0099
Project Number: OP2020-005

Installation Name and Address

Texas Eastern - Oran
Route 1, Highway 77 South
Oran, MO 63771
Scott County

Parent Company's Name and Address

Texas Eastern Transmission, LP
5400 Westheimer Ct.
Houston, TX 77056

Installation Description:

Oran Compressor Station is a natural gas compressor station. The installation operates ten natural gas fired compressor engines used for the compression of pipeline natural gas. The engines have been in service since 1947. Support equipment includes process heaters, petroleum tanks and an emergency generator. The facility is considered a major source of Nitrogen Oxides and Carbon Monoxide.

FEB 04 2020

Effective Date


Director or Designee
Department of Natural Resources



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I. Installation Equipment Listing

EMISSION UNITS WITH LIMITATIONS

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

Emission Unit #	Description of Emission Unit
11001	Compressor Engine - 10.94 MMBtu, 1100HP, NG 4SRB (1947) (Ingersoll Rand Model KVG-103)
11002	Compressor Engine - 10.94 MMBtu, 1100HP, NG 4SRB (1947) (Ingersoll Rand Model KVG-103)
11003	Compressor Engine - 10.94 MMBtu, 1100HP, NG 4SRB (1947) (Ingersoll Rand Model KVG-103)
11008	Compressor Engine - 10.94 MMBtu, 1100HP, NG 4SRB (1947) (Ingersoll Rand Model KVG-103)
11009	Compressor Engine - 10.94 MMBtu, 1100HP, NG 4SRB (1947) (Ingersoll Rand Model KVG-103)
11010	Compressor Engine - 10.94 MMBtu, 1100HP, NG 4SRB (1947) (Ingersoll Rand Model KVG-103)
11011	Compressor Engine - 10.94 MMBtu, 1100HP, NG 4SRB (1947) (Ingersoll Rand Model KVG-103)
11012	Compressor Engine - 10.94 MMBtu, 1100HP, NG 4SRB (1947) (Ingersoll Rand Model KVG-103)
11013	Compressor Engine - 10.94 MMBtu, 1100HP NG 4SRB (1947) (Ingersoll Rand Model KVG-103)
11014	Compressor Engine - 10.94 MMBtu, 1100HP NG 4SRB (1947) (Ingersoll Rand Model KVG-103)
11035	Auxiliary Generator - 4.84 MMBtu, 440 HP, NG 4SRB (1975) (LeRoi Model L3460)
SHTR	8 Natural Gas Space Heaters – Heat Input Total of 1.439 MMBTU/hr

EMISSION UNITS WITHOUT SPECIFIC LIMITATIONS

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

Description of Emission Source	
TK-V5	5,770 Gallon Condensate Storage Tank
TK-LO1(T-3)	9,426 Gallon Used Lube Oil Storage Tank
TK-LO2(T-2)	750 Gallon Used Lube Oil Storage Tank
TK-LO3(T-5)	1,000 Gallon Used Lube Oil Storage Tank
TK-EC1	4,500 Gallon Coolant Storage Tank
TL-PL	5,770 Gallon Condensate Truck
TL-LO	11,176 Gallon Used Lube Oil Truck
TL-EC	4,500 Gallon Coolant Truck
SV-V1	300 Gallon Condensate Pressure Vessel
SV-V2	470 Gallon Condensate Pressure Vessel
SV-V4S	33 Gallon Condensate Pressure Vessel
SV-V4D	33 Gallon Condensate Pressure Vessel
GR-ST	Gas Release Stationary
GR-PL	Gas Release Pipeline
PC-NG	Natural Gas Piping Components
PC-PL	Condensate Piping Components
PC-LO	Used Lube Piping Components
PC-EC	Coolant Piping Components
PW	25 gallon Safety Kleen Parts Washer

II. Plant Wide Emission Limitations

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

None

III. Emission Unit Specific Emission Limitations

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

Permit Condition A MACT ZZZZ			
10 CSR 10-6.075 Maximum Achievable Control Technology Regulations 40 CFR 63 Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines			
EU Reference	Description		
11001	Compressor Engine - 10.94 MMBtu, 1100HP, NG 4SRB (1947) (Ingersoll Rand Model KVG-103)		
11002	Compressor Engine - 10.94 MMBtu, 1100HP, NG 4SRB (1947) (Ingersoll Rand Model KVG-103)		
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11013	Compressor Engine - 10.94 MMBtu, 1100HP, NG 4SRB (1947) (Ingersoll Rand Model KVG-103)		
11014	Compressor Engine - 10.94 MMBtu, 1100HP, NG 4SRB (1947) (Ingersoll Rand Model KVG-103)		
Engine Category	Non-Emergency, Non-Black Start, 4SRB, Remote, Stationary, >500 HP	Emission Limitations	N/A
Date Constructed	1947	Fuel Requirements	N/A
Initial Compliance Date	October 19, 2013	Performance Tests	Table 4 Items 2-3, §63.6620(a), (b), (d), (e), (f), (g), (h), (i)
Notification Requirements	No Requirements per §63.6645(a)(5)	General Provisions (40 CFR Part 63)	Yes, except per §63.6645(a)(5), the following do not apply: §63.7(b), (c), §63.8(e), (f)(4) and (f)(6), and §63.9(b)-(e), (g), (h)
Continuous Compliance	§63.6605, §63.6640(a), Table 6 Item 9,-§63.6603(f), §63.6635	Recordkeeping and Reporting	§63.6655(a), (e), §63.6640(b), (e), §63.6660, §63.6650(c)(1)-(4), (d), (f)
Operating Limitations	Table 2d Item 11, Footnote 1, §63.6625(h), (j)		
<i>The full text of the requirements for these units under MACT ZZZZ are found in 40 CFR 63 under the citations presented in the table above.</i>			

Continuous Compliance:

- 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 monitoring equipment, in a manner consistent with safety and good air pollution 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 MACT ZZZZ have been achieved. [§63.6605(b)]
- 3) The permittee must demonstrate continuous compliance by operating and maintaining the stationary RICE according to the manufacturer's emission-related operation and maintenance instructions; or the permittee must develop and follow a maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. [Item 9, Table 6]
- 4) Except for monitor malfunctions, associated repairs, required performance evaluations, and required quality assurance or control activities, the permittee must monitor continuously at all times that the stationary RICE is operating. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions. [§63.6635(b)]
- 5) The permittee may not use data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities in data averages and calculations used to report emission or operating levels. The permittee must, however, use all the valid data collected during all other periods. [§63.6635(c)]

Operational Limitations:

- 1) During periods of startup 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. [§63.6625(h)]
- 2) The permittee must meet the following requirements (*except during periods of startup*);
 - a) Change oil and filter every 2,160 hours of operation or annually, whichever comes first; (The permittee has the option to utilize an oil analysis program¹) [Item 11.a, Table 2d]
 - b) Inspect spark plugs every 2,160 hours of operation or annually, whichever comes first, and replace as necessary; and [Item 11.b, Table 2d]

¹ The permittee has the option of utilizing an oil analysis program in order to extend the 2,160 hour oil change requirement. The oil analysis must be performed at the same frequency specified for changing the oil. The analysis program must at a minimum analyze the following three parameters: Total Acid Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Acid Number increases by more than 3.0 milligrams of potassium hydroxide (KOH) per gram from Total Acid Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the permittee is not required to change the oil. If any of the limits are exceeded, the permittee must change the oil within 2 business days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the permittee must change the oil within 2 business days or before commencing operation, whichever is later. The permittee must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine. [§63.6625(j)]

- c) Inspect all hoses and belts every 2,160 hours of operation or annually, whichever comes first, and replace as necessary. [Item 11.c, Table 2d]

Recordkeeping and Reporting:

- 1) For each deviation from an operating limitation that occurs for a stationary RICE where the permittee is not using a CMS to comply with the emission or operating limitations in this subpart, the Compliance report must contain; [§63.6650(d)]
 - a) Company name and address [§63.6650(c)(1)]
 - b) Statement by a responsible official, with that official's name, title, and signature, certifying the accuracy of the content of the report [§63.6650(c)(2)]
 - c) Date of report and beginning and ending dates of the reporting period [§63.6650(c)(3)]
 - d) If the permittee had a malfunction during the reporting period, the compliance report must include the number, duration, and a brief description for each type of malfunction which occurred during the reporting period. The report must also include a description of actions taken by the permittee during a malfunction of an affected source to minimize emissions in accordance with §63.6605(b), including actions taken to correct a malfunction [§63.6650(c)(3)]
 - e) The total operating time of the stationary RICE at which the deviation occurred during the reporting period [§63.6650(d)(1)]
 - f) Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken [§63.6650(d)(2)]
- 2) Each affected source that has obtained a title V operating permit pursuant to 40 CFR part 70 must report all deviations as defined in MACT ZZZZ in the semiannual monitoring report required by 40 CFR 70.6 (a)(3)(iii)(A). [§63.6650(f)]
- 3) The permittee must keep records of all required maintenance performed on the monitoring equipment. [§63.6655(a)(4)]
- 4) The permittee must keep records of actions taken during periods of malfunction to minimize emissions in accordance with §63.6605(b). [§63.6655(a)(5)]
- 5) The permittee must keep records of the maintenance conducted on the stationary RICE in order to demonstrate that the permittee operated and maintained the stationary RICE according to the facility's own maintenance plan. [§63.6655(e)]
- 6) The permittee must keep records in a form readily available for expeditious review according to §63.10(b)(1). The records must be kept for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report or record. They must also be readily accessible in hard copy or electronic form for at least 5 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to §63.10(b)(1). [§63.6660]
- 7) The permittee must report each instance in which the permittee did not meet operating limitation in Table 2d to MACT ZZZZ that apply. These instances are deviations from the operating limitations of MACT ZZZZ. These deviations must be reported according to the requirements in §63.6650. [§63.6640(b)]
- 8) The permittee must report each instance in which the permittee did not meet the requirements in Table 8 of MACT ZZZZ that apply. [§63.6640(e)]
- 9) The permittee shall submit applicable reports as specified in §63.6650 to the Missouri Air Compliance Coordinator, Air Branch, Enforcement & Compliance Assurance Division at EPA Region 7, 11201 Renner Blvd., Lenexa, KS 66219 and shall send copies to the Missouri Air Pollution Control Program's Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or to AirComplianceReporting@dnr.mo.gov until such time as MoDNR is delegated

authority of 40 CFR Part 63, Subpart ZZZZ. Afterwards, reports and certifications shall be submitted only to MoDNR.

Permit Condition B MACT ZZZZ			
10 CSR 10-6.075 Maximum Achievable Control Technology Regulations 40 CFR 63 Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines			
EU Reference	Description		
11035	Auxiliary Generator - 4.84 MMBtu, 440 HP, NG 4SRB (1975) (LeRoi Model L3460)		
Engine Category	Emergency, Non-Black Start, 4SRB, Stationary, <500 HP	Emission Limitations	N/A
Date Constructed	1975	Fuel Requirements	N/A
Initial Compliance Date	October 19, 2013	Performance Tests	N/A
Notification Requirements	No Requirements per §63.6645(a)(5)	General Provisions (40 CFR Part 63)	Yes, except per §63.6645(a)(5), the following do not apply: §63.7(b), (c), §63.8(e), (f)(4), (f)(6), and §63.9(b)-(e), (g), (h)
Continuous Compliance	§63.6605, §63.6640(a), §63.6635, Table 6 Item 9	Recordkeeping and Reporting	§63.6655(a), (e), §63.6660, §63.6640(b), (e), §63.6650(c)(1)-(4), (d), (f)
Operating Limitations	Table 2d Item 5, Footnotes 1-2, §63.6625(e), (f), (h), (j), §63.6640(f)(1), (2)(i), (4)		
<i>The full text of the requirements for these units under MACT ZZZZ are found in 40 CFR 63 under the citations presented in the table above.</i>			

Continuous Compliance:

- 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 monitoring equipment, in a manner consistent with safety and good air pollution practices for minimizing emissions. The general duty to minimize emissions does not require the permittee to make any further efforts to reduce emission if levels required by MACT ZZZZ have been achieved. [§63.6605(b)]
- 3) The permittee must demonstrate continuous compliance by operating and maintaining the stationary RICE according to the manufacturer’s emission-related operation and maintenance instructions; or the permittee must develop and follow a maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. [Item 9, Table 6]
- 4) Except for monitor malfunctions, associated repairs, required performance evaluations, and required quality assurance or control activities, the permittee must monitor continuously at all times that the stationary RICE is operating. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions. [§63.6635(b)]

- 5) The permittee may not use data recorded during monitoring malfunctions, associated repairs and required quality assurance in calculations used to report operating levels. The permittee must, however, use all the valid data collected during all other periods. [§63.6635(c)]

Operating Limitations:

- 1) The permittee must operate and maintain the stationary RICE according to the manufacturer's emission-related written instructions or develop their maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. [§66.6625(e)]
- 2) During periods of startup, the permittee must minimize the engine's time spent at idle 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)]
- 3) The permittee must install a non-resettable hour meter if one is not already installed. [§63.6624(f)]
- 4) The permittee must meet the following requirement (*except during periods of startup*);
 - 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 program²) [Table 2d Item 5.a]
 - b) Inspect spark plugs every 500 hours of operation or annually, whichever comes first, and replace as necessary; and [Table 2d Item 5.b]
 - c) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary. [Table 2d Item 5.c]
- 1) If an emergency engine is operating during an emergency and it is not possible to shut down the engine in order to perform the management practice requirements on the schedule required, or if performing the management practice on the required schedule would otherwise pose an unacceptable risk under federal, state, or local law, the management practice can be delayed until the emergency is over or the unacceptable risk under federal, state, or local law has abated. The management practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under federal, state, or local law has abated. The permittee must report any failure to perform the management practice on the schedule required and the federal, state or local law under which the risk was deemed unacceptable. [Table 2d Footnote 2]
- 2) The permittee must operate the emergency stationary RICE according to the requirements in paragraphs §63.6640(f)(1), §63.6640(f)(2)(i) and §63.6640(f)(4). [§63.6640(f)]

² The permittee has the option of utilizing an oil analysis program in order to extend the 500 hour oil change requirement. The oil analysis must be performed at the same frequency specified for changing the oil. The analysis program must at a minimum analyze the following three parameters: Total Acid Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Acid Number increases by more than 3.0 milligrams of potassium hydroxide (KOH) per gram from Total Acid Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the permittee is not required to change the oil. If any of the limits are exceeded, the permittee must change the oil within 2 business days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the permittee must change the oil within 2 business days or before commencing operation, whichever is later. The permittee must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine. [§63.6625(j)]

- 3) In order for the engine to be considered an emergency stationary RICE under 40 CFR 63 Subpart ZZZZ, any operation other than emergency operation, maintenance and testing and operation in non-emergency situations for 50 hours per year, as described in paragraphs §63.6640(f)(1), §63.6640(f)(2)(i) and §63.6640(f)(4), is prohibited. [§63.6640(f)]
- 4) If the permittee does not operate the engine according to the requirements in paragraphs §63.6640(f)(1), §63.6640(f)(2)(i) and §63.6640(f)(4) the engine will not be considered an emergency engine under 40 CFR 63 Subpart ZZZZ and must 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 an emergency stationary RICE for the purpose specified in paragraph §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 §63.6640(f)(2). [§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) The emergency station may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in nonemergency situations are counted as part of the 100 hours per calendar year for maintenance and testing provided in paragraph §63.6640(f)(2). 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)]

Recordkeeping and Reporting:

- 1) For each deviation from an operating limitation that occurs the Compliance report must contain; [§63.6650(d)]
 - a) Company name and address [§63.6650(c)(1)]
 - b) Statement by a responsible official, with that official's name, title, and signature, certifying the accuracy of the content of the report [§63.6650(c)(2)]
 - c) Date of report and beginning and ending dates of the reporting period [§63.6650(c)(3)]
 - d) If the permittee had a malfunction during the reporting period, the compliance report must include the number, duration, and a brief description for each type of malfunction which occurred during the reporting period. The report must also include a description of actions taken by the permittee during a malfunction of an affected source to minimize emissions in accordance with §63.6605(b), including actions taken to correct a malfunction [§63.6650(c)(3)]
 - e) The total operating time of the stationary RICE at which the deviation occurred during the reporting period [§63.6650(d)(1)]
 - f) Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken [§63.6650(d)(2)]

- 2) Each affected source that has obtained a title V operating permit pursuant to 40 CFR part 70 must report all deviations as defined in MACT ZZZZ in the semiannual monitoring report required by 40 CFR 70.6 (a)(3)(iii)(A). [§63.6650(f)]
- 3) The permittee must keep records of all required maintenance performed on the monitoring equipment. [§63.6655(a)(4)]
- 4) 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 monitoring equipment to its normal or usual manner of operation. [§63.6655(a)(5)]
- 5) The permittee must keep records of the maintenance conducted on the stationary RICE in order to demonstrate that the permittee operated and maintained the stationary RICE the facility's own maintenance plan. [§63.6655(e)]
- 6) 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)]
- 7) The permittee must keep records in a form readily available for expeditious review according to §63.10(b)(1). The records must be kept for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report or record. They must also be readily accessible in hard copy or electronic form for at least 5 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to §63.10(b)(1). [§63.6660]
- 8) The permittee must report each instance in which the permittee did not meet each operating limitation in Table 2d of MACT ZZZZ that apply. These instances are deviations from the operating limitations of MACT ZZZZ. These deviations must be reported according to the requirements in §63.6650. [§63.6640(b)]
- 9) The permittee must report each instance in which they did not meet the requirements in Table 8 of MACT ZZZZ that apply. [§63.6640(e)]
- 10) The permittee shall submit applicable reports as specified in §63.6650 to the Missouri Air Compliance Coordinator, Air Branch, Enforcement & Compliance Assurance Division at EPA Region 7, 11201 Renner Blvd., Lenexa, KS 66219 and shall send copies to the Missouri Air Pollution Control Program's Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or to AirComplianceReporting@dnr.mo.gov until such time as MoDNR is delegated authority of 40 CFR Part 63, Subpart ZZZZ. Afterwards, reports and certifications shall be submitted only to MoDNR.

Permit Condition C 10 CSR 10-6.261		
10 CSR 10-6.261 Control of Sulfur Dioxide Emissions		
Emission Unit	Description	Requirements
11001	Compressor Engine - 10.94 MMBtu, 1100HP, NG 4SRB (1947) (Ingersoll Rand Model KVG-103)	Recordkeeping and Reporting
11002	Compressor Engine - 10.94 MMBtu, 1100HP, NG 4SRB (1947) (Ingersoll Rand Model KVG-103)	Recordkeeping and Reporting
11003	Compressor Engine - 10.94 MMBtu, 1100HP, NG 4SRB (1947) (Ingersoll Rand Model KVG-103)	Recordkeeping and Reporting
11008	Compressor Engine - 10.94 MMBtu, 1100HP, NG 4SRB (1947) (Ingersoll Rand Model KVG-103)	Recordkeeping and Reporting
11009	Compressor Engine - 10.94 MMBtu, 1100HP, NG 4SRB (1947) (Ingersoll Rand Model KVG-103)	Recordkeeping and Reporting
11010	Compressor Engine - 10.94 MMBtu, 1100HP, NG 4SRB (1947) (Ingersoll Rand Model KVG-103)	Recordkeeping and Reporting
11011	Compressor Engine - 10.94 MMBtu, 1100HP, NG 4SRB (1947) (Ingersoll Rand Model KVG-103)	Recordkeeping and Reporting
11012	Compressor Engine - 10.94 MMBtu, 1100HP, NG 4SRB (1947) (Ingersoll Rand Model KVG-103)	Recordkeeping and Reporting
11013	Compressor Engine - 10.94 MMBtu, 1100HP, NG 4SRB (1947) (Ingersoll Rand Model KVG-103)	Recordkeeping and Reporting
11014	Compressor Engine - 10.94 MMBtu, 1100HP, NG 4SRB (1947) (Ingersoll Rand Model KVG-103)	Recordkeeping and Reporting
11035	Auxiliary Generator - 4.84 MMBtu, 440 HP, NG 4SRB (1975) (LeRoi Model L3460)	Recordkeeping and Reporting
SHTR	8 Natural Gas Space Heaters – Heat Input Total of 1.439 MMBTU/hr	Recordkeeping and Reporting

Note: As of issuance of this permit, 10 CSR 10-6.261 is a State Only requirement³

Monitoring/Recordkeeping

- 1) Individual units fueled exclusively with natural gas (as defined in 40 CFR 72.2) are determined to be in compliance with this rule by complying with the record keeping requirements. [6.261(1)(A)]
- 2) The permittee shall determine compliance using fuel delivery records or fuel sampling and analysis. [6.261(4)(D)]
- 3) If using fuel delivery records:
 - a) The permittee must maintain a record of fuel deliveries. [6.261(4)(C)]
 - b) The permittee must maintain the fuel supplier information to certify all fuel deliveries. Bills of lading and/or other fuel delivery documentation containing the following information for all fuel purchases or deliveries are deemed acceptable to comply with the requirements of this rule:
 - i) The name, address, and contact information of the fuel supplier; [6.261(4)(C)(1)]
 - ii) The type of fuel; [6.261(4)(C)(2)]
 - iii) The sulfur content or maximum sulfur content expressed in percent sulfur by weight or in ppm sulfur; and [6.261(4)(C)(4)]
 - iv) The heating value of the fuel. [6.261(4)(C)(5)]
- 4) If using fuel sampling and analysis:
 - a) Determine sulfur weight percent, or equivalent, of fuel(s) used to operate fuel emission sources and/or units regulated by this rule in accordance with 10 CSR 10-6.040. [6.261(5)(D)]

³ Missouri’s SIP has not adopted this regulation; therefore, this regulation is a state only requirement. Upon adoption into Missouri’s SIP this regulation will be both a state and federal requirement.

- 5) The permittee must furnish the Director all data necessary to determine compliance status.
[6.261(4)(G)]
- 6) Records may be kept electronically using database or workbook systems, as long as all required information is readily available for compliance determinations.
- 7) All required reports and records must be retained on-site for a minimum of five (5) years and made available within five (5) business days upon written or electronic request by the Director.
[6.261(4)(F)]

Reporting

- 1) The permittee shall report any deviations from the monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and annual compliance certification.
- 2) All reports and certifications shall be submitted to the Air Pollution Control Program's Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov.

IV. Core Permit Requirements

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

10 CSR 10-6.045 Open Burning Requirements

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

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

- 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 make such permit available within a reasonable period of time 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 pay an annual emission fee per ton of regulated air pollutant emitted according to the schedule in the rule. This fee is an emission fee assessed under authority of RSMo. 643.079.

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

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

10 CSR 10-6.150 Circumvention

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

10 CSR 10-6.165 Restriction of Emission of Odors

This requirement is a State Only permit requirement.

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

10 CSR 10-6.170

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

Emission Limitation:

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

10 CSR 10-6.180 Measurement of Emissions of Air Contaminants

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

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

This is a State Only permit requirement.

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,

Permit Duration and Extension of Expired Permits

10 CSR 10-6.065(5)(C)1.B, 10 CSR 10-6.065(5)(E)3.C

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. If a timely and complete application for a permit renewal is submitted, but the Air Pollution Control Program fails to take final action to issue or deny the renewal permit before the end of the term of this permit, this permit shall not expire until the renewal permit is issued or denied.

General Record Keeping and Reporting Requirements

10 CSR 10-6.065(5)(C)1.C

- 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 available within a reasonable period of time 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 or AirComplianceReporting@dnr.mo.gov.
 - b) The permittee shall submit a report of all required monitoring by:
 - i) October 1st for monitoring which covers the January through June time period, and
 - ii) April 1st for monitoring which covers the July through December time period.
 - c) Each report shall identify any deviations from emission limitations, monitoring, record keeping, reporting, or any other requirements of the permit, this includes deviations or Part 64 exceedances.
 - d) Submit supplemental reports as required or as needed. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
 - i) Notice of any deviation resulting from an emergency (or upset) condition as defined in paragraph (5)(C)7.A of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two working days after the date on which the emission limitation is exceeded due to the emergency, if the permittee wishes to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and the permittee can identify the cause(s) of the emergency. The permitted installation must show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of

emissions that exceeded the emission standards or requirements in the permit. The notice must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.

- ii) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.
- iii) Any other deviations identified in the permit as requiring more frequent reporting than the permittee's semiannual report shall be reported on the schedule specified in this permit.
- 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.

Risk Management Plan Under Section 112(r)

10 CSR 10-6.065(5)(C)1.D

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.

Severability Clause

10 CSR 10-6.065(5)(C)1.F

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

General Requirements

10 CSR 10-6.065(5)(C)1.G

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

permittee may make a claim of confidentiality for any information or records submitted pursuant to 10 CSR 10-6.065(5)(C)1.

Incentive Programs Not Requiring Permit Revisions

10 CSR 10-6.065(5)(C)1.H

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

Reasonably Anticipated Operating Scenarios

10 CSR 10-6.065(5)(C)1.I

There are no reasonably anticipated operating scenarios.

Compliance Requirements

10 CSR 10-6.065(5)(C)3

- 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 Missouri Compliance Coordinator, Air Branch, Enforcement and Compliance Assurance Division, EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, as well as the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov. All deviations and Part 64 exceedances and excursions must

be included in the compliance certifications. The compliance certification shall include the following:

- a) The identification of each term or condition of the permit that is the basis of the certification;
- b) The current compliance status, as shown by monitoring data and other information reasonably available to the installation;
- c) Whether compliance was continuous or intermittent;
- d) The method(s) used for determining the compliance status of the installation, both currently and over the reporting period; and
- e) Such other facts as the Air Pollution Control Program will require in order to determine the compliance status of this installation.

Permit Shield

10 CSR 10-6.065(5)(C)6

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

Emergency Provisions

10 CSR 10-6.065(5)(C)7

- 1) An emergency or upset as defined in 10 CSR 10-6.065(5)(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.

Operational Flexibility

10 CSR 10-6.065(5)(C)8

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

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

Off-Permit Changes

10 CSR 10-6.065(5)(C)9

- 1) Except as noted below, the permittee may make any change in its permitted operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Insignificant activities listed in the permit, but not otherwise addressed in or prohibited by this permit, shall not be considered to be constrained by this permit for purposes of the off-permit provisions of this section. Off-permit changes shall be subject to the following requirements and restrictions:
 - a) The change must meet all applicable requirements of the Act and may not violate any existing permit term or condition; the permittee may not change a permitted installation without a permit

revision if this change is subject to any requirements under Title IV of the Act or is a Title I modification;

- b) The permittee must provide contemporaneous written notice of the change to the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov, as well as Missouri Compliance Coordinator, Air Branch, Enforcement and Compliance Assurance Division, EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219. This notice shall not be required for changes that are insignificant activities under 10 CSR 10-6.065(5)(B)3 of this rule. This written notice shall describe each change, including the date, any change in emissions, pollutants emitted and any applicable requirement that would apply as a result of the change.
- c) The permittee shall keep a record describing all changes made at the installation that result in emissions of a regulated air pollutant subject to an applicable requirement and the emissions resulting from these changes; and
- d) The permit shield shall not apply to these changes.

Responsible Official

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

The application utilized in the preparation of this permit was signed by Mr. Kerry C. Puckett, Vice President Operations US. 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 permittee 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 permittee 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.

Reopening-Permit for Cause

10 CSR 10-6.065(5)(E)6

This permit shall be reopened for cause if:

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

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

Statement of Basis

10 CSR 10-6.065(5)(E)1.C

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.

STATEMENT OF BASIS

INSTALLATION DESCRIPTION

Oran Compressor Station is a natural gas compressor station. The installation operates ten natural gas fired compressor engines used for the compression of pipeline natural gas. The engines have been in service since 1947. Support equipment includes small process heaters, tanks and an emergency generator. The facility is considered a major source of Nitrogen Oxides and Carbon Monoxide.

The overall potential emissions were calculated through a variety of techniques involving emission factors, stack testing, chemical composition and engineering calculations. The first step in calculating the potential emissions of each individual non-emergency RICE was to determine the emission factors. While a NO_x and CO had stack testing data readily available, the other pollutants had to be determined using section 1.4 in AP-42. These values were then multiplied by the MHDR and converted into tons per year (tpy). The same process was then used for the emergency RICE and the space heaters with one minor exception. For the emergency RICE, they are estimated at 500 hours a year, as opposed to 8760, as stated in an EPA memorandum on calculating potential to emit for emergency generators.

The next potential emissions calculated were the loading losses from trucks for tank loading operations. Using AP-42 5.2, it was determined that the equation $L_L = 12.46 \frac{SPM}{T}$ would be used to calculate loading losses, where S is a saturation factor, P is true vapor pressure of liquid loaded, M is molecular weight of vapors and T is temperature of bulk liquid loaded. This value was then multiplied by the speciation data, as calculated by the installation using emission analysis, in each individual truck to determine the amount of each pollutant emitted per year.

The potential emissions from the tanks and pressure vessels consisted of standing, working and flash losses. The standing and working losses were calculated for each unit using Tanks 4.09b. These values were then multiplied by the compositions of the material in the units to determine the amount of each pollutant emitted. Flash losses were calculated for units with pipeline liquid by multiplying their liquid input rate, flash gas density and flash factor constant together to give overall flash losses. Similar to before, this value was then multiplied by the speciation data of the units to determine the amount of each pollutant emitted per year.

Piping component emissions required the use of EPA 453 Table 2.4 to find emission factors for each type of piping component such as valves and connectors. These were then multiplied by the number of each corresponding component and multiplied once again by the speciation data on the material in the units to determine the amount of each pollutant emitted. Gas release and parts washer emissions were calculated by multiplying annual throughput by the compositions of natural gas. Haul road calculations were not included because it was determined that they would not have a significant impact on major thresholds.

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

Pollutants	Potential Emissions	Reported Emissions				
		2018	2017	2016	2015	2014
Particulate Matter ≤ Ten Microns (PM ₁₀)	9.35	0.05	0.22	0.06	0.01	0.03
Particulate Matter ≤ 2.5 Microns (PM _{2.5})	9.35	0.05	0.22	0.06	0.01	0.03
Sulfur Oxides (SO _x)	0.29	0.00	0.01	0.00	0.00	0.00
Nitrogen Oxides (NO _x)	2311.97	10.30	45.59	11.66	11.17	6.45
Volatile Organic Compounds (VOC)	93.30	2.44	1.40	1.15	1.28	1.32
Carbon Monoxide (CO)	437.42	1.91	8.45	2.16	2.07	1.19
Hazardous Air Pollutants (HAPs)	18.67	0.01	0.00	0.00	0.00	0.00
Formaldehyde	9.82	N/A	N/A	N/A	N/A	N/A

Permit Reference Documents

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

- 1) Part 70 Operating Permit Application, received May 7, 2018;
- 2) 2018 Emissions Inventory Questionnaire, received April 30, 2019; and
- 3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition.

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

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

None

Other Air Regulations Determined Not to Apply to the Operating Permit

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

10 CSR 10-6.100, *Alternate Emission Limits*

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

Construction Permit History

No construction permits have been issued to this installation since the original construction permit.

New Source Performance Standards (NSPS) Applicability

40 CFR Part 60 Subpart IIII *Standards of Performance for New Stationary Sources*

This facility is not subject to this subpart due to the fact that it only applies to compression ignition engines, per §60.4200, and all of the engines at the facility are spark ignition.

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

This facility is not subject to this subpart because it only applies to manufacturers of SI engines or owners/operators of SI engines that were constructed/modified after June 12, 2006, per §60.4230. This facility only operates SI engines that were constructed prior to June 12, 2006.

Maximum Achievable Control Technology (MACT) Applicability

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

The facility is not subject to the requirements of MACT HHH, since it is not a major source for HAP per §63.1270(a).

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

The facility is subject to this subpart because they operate stationary RICE at an area sources of HAPs as required in §63.6585. Emission units 11001-11003 and 11008-11014 fell under engine category rules for non-emergency, non-black start, 4SRB, remote, stationary, and greater than 500 HP RICE. Emission unit 11035 fell under engine category rules for emergency, non-black start 4SRB, stationary, and less than 500 HP RICE.

40 CFR Part 63 Subpart T *National Emission Standards for Halogenated Solvent Cleaning*

This subpart does not apply because the parts washer solvent used is hydrotreated light petroleum distillate and does not contain any of the required halogenated HAPs listed in §63.460 to be applicable.

National Emissions Standards for Hazardous Air Pollutants (NESHAPS) Applicability

40 CFR Part 61 Subpart J *National Emission Standard for Equipment Leaks (Fugitive Emission Sources) of Benzene*

This standard does not apply because none of the equipment meets the 10% benzene threshold to be considered in benzene service as required in §61.110.

40 CFR Part 61 Subpart M *National Emission Standard for Asbestos*

This standard applies to the facility and restricts the use of asbestos for roadways and insulating materials.

Compliance Assurance Monitoring (CAM) Applicability

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

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

- Is subject to an emission limitation or standard, and
- Uses a control device to achieve compliance, and

- Has pre-control emissions that exceed or are equivalent to the major source threshold. 40 CFR Part 64 is not applicable because none of the pollutant-specific emission units uses a control device to achieve compliance with a relevant standard.

Other Regulatory Determinations

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

10 CSR 10-6.220(1)(L) specifies that this rule does not apply to any emission unit burning only natural gas. All of the engines and space heaters at the facility are exclusively burning natural gas, therefore, no provisions from this rule were placed into this permit.

10 CSR 10-6.260 Control of Sulfur Dioxide Emissions

This regulation does not apply to the installation because the RICE and space heaters only burn natural gas and are exempt according to 10 CSR 10-6.260(1)(A)2.

10 CSR 10-6.261 Control of Sulfur Dioxide Emissions

This regulation applies to the engines and space heaters because they emit sulfur dioxide (SO₂) as required by 10 CSR 10-6.261(1). However, they are only required to comply with recordkeeping and reporting due to the exception in 10 CSR 10-6.261(1)(A) for individual units fueled exclusively with natural gas.

10 CSR 10-6.400 Restriction of Emission of Particulate Matter From Industrial Processes

This regulation does not apply because the units combust natural gas and do not meet the definition of process weight required by this rule.

10 CSR 10-6.405 Restriction of Particulate Matter Emissions From Fuel Burning Equipment Used For Indirect Heating

This regulation does not apply because the space heaters are the only indirect heating units at the facility and they are exempt because they are fueled by natural gas, per 10 CSR 10-6.405(1)(E).

10 CSR 10-6.390 Control of NO_x Emissions From Large Stationary Internal; Combustion Engines

This regulation does not apply because none of the engines at the facility exceed the 1,300 horsepower applicability threshold at 10 CSR 10-6.390(1)(A).

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

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

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

Should a later determination conclude that the installation is subject to one or more of the regulations cited in this Statement of Basis or other regulations which were not cited, the installation shall determine and demonstrate, to the ACP'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

We received comments from the Environmental Protection Agency, Region 7, on December 2, 2019. The comments are addressed in the order in which they appear.

Comment #1:

Permit Condition A MACT ZZZZ and Permit Condition B MACT ZZZZ incorporate requirements from 40 CFR part 63, Subpart ZZZZ-National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines applicable to the emission units referenced in both permit conditions. The "Record keeping/Reporting" requirements in both Permit Condition A MACT ZZZZ and Permit Condition B MACT ZZZZ detail the specific compliance records Texas Eastern-Oran shall maintain and the reports to be submitted. However, neither permit condition identifies the recipient of these compliance reports.

Texas Eastern-Oran is described as an area source of hazardous air pollutants (HAPs) and pursuant to 10 CSR 10-6.075, MoDNR identifies EPA as the primary agency responsible for enforcement of the area source standards under Subpart ZZZZ. EPA, therefore, recommends MoDNR consider including:

"The permittee shall submit applicable reports as specified in §63.6650 to the Missouri Air Compliance Coordinator, Air Branch, Enforcement & Compliance Assurance Division at EPA Region 7, 11201 Renner Blvd., Lenexa, KS 66219 and shall send copies to the Missouri Air Pollution Control Program's Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or to AirComplianceReporting@dnr.mo.gov until such time as MoDNR is delegated authority of 40 CFR Part 63, Subpart ZZZZ. Afterwards, reports and certifications shall be submitted only to MoDNR."

in the Record keeping/Reporting section of both Permit Condition A MACT ZZZZ and Permit Condition B MACT ZZZZ.

Response to Comment:

The Department agrees with the comments and included the suggested text in the recordkeeping/reporting sections of Permit Condition A and B.

Comment #2:

The requirements from 40 CFR part 63, Subpart ZZZZ-National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines are based on the horsepower of the applicable stationary reciprocating internal combustion engine. In an effort to enhance the review of the requirements included in Permit Condition A MACT ZZZZ, EPA suggests MoDNR consider modifying the emission unit descriptions, associated with Permit Condition A MAC ZZZZ, to include the horsepower of each of the compressor engines.

Response to Comment:

The Department agrees with the comments and included the horsepower of the compressor engines in the emission unit descriptions for Permit Condition A.