Exhibit No.:
Issues: Environmental Issues
Witness: Block M. Andrews
Sponsoring Party: Aquila Networks-MPS
Case No.: EA-2006-0309

Before the Public Service Commission
of the State of Missouri

Surrebuttal Testimony

of

Block M. Andrews

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI
SURREBUTTAL TESTIMONY OF BLOCK M. ANDREWS
ON BEHALF OF AQUILA, INC.
D/B/A AQUILA NETWORKS-MPS
CASE NO. EA-2006-0309

Q. What is your name and position?

A. My name is Block M. Andrews, and I am Director of Environmental Services for Aquila, Inc. ("Aquila" or "Company).

Q. Are you the same Block M. Andrews that filed direct testimony in this case before the Missouri Public Service Commission ("Commission")?

A. Yes, I am.

Q. What is the purpose of your surrebuttal testimony?

A. I will be responding to the environmental issues in the testimony filed by Harold R. Stanley.

Q. On page 4 of his rebuttal testimony, Mr. Stanley states that the Southern Star natural compressor station completed an environmental impact study in 2000 prior to additional construction, but that Aquila did not perform studies to the level of detail of the compressor station before starting construction of the South Harper Facility. Why did Aquila not perform similar detailed studies?

A. The natural compressor station is regulated by the Federal Energy Regulatory Commission ("FERC"). Under FERC rules, before any new construction at a gas compressor station can commence, the facility is **required** to perform either an environmental assessment (EA) or environmental impact statement (EIS). Either an EIS or EA requires the applicant to look at such environmental issues as

cultural resources, wetland impacts, threatened and endangered species, air quality, water quality, and noise impacts. Part of the EIS and EA process is to hold public meetings and to obtain comments from stakeholders. The process is described on the FERC website (http://www.ferc.gov/for-citizens/get-involved/process.asp#skipnavsub). Thus the compressor station was simply following the requirements for a compressor facility.

Q. Is Aquila regulated by FERC?

A. Yes. While Aquila is also regulated by FERC, the FERC does not require a newly constructed simple cycle combustion turbines to go through the EIS or EA process. Aquila did, however, perform environmental studies typically found in EIS or EA's including cultural resources, wetlands impacts, threatened and endangered species, air quality, water quality, and noise studies. Several of these studies were not required. Aquila also held public meetings in the Fall of 2004 to discuss local citizen concerns. Aquila obtained all required environmental permits and approvals for construction of the site.

Q. On page 5 of his rebuttal testimony, Mr. Stanley contends that the engine size and emissions at the compressor station are much smaller than the South Harper site. How do you respond?

A. Aquila is unaware of any zoning criteria that base land use on the number of horsepower at a particular location. In regard to emissions, we believe the important metric is the health effects of the plant emissions.

Q. Please explain.

A. The compressor station air permit to construct issued June 19, 2000 (See Page 12 of Attachment A) shows the modeled concentration of nitrogen oxides at 2 ug/m3 and carbon monoxide concentrations of 13.5 (8 hour average) and 19.2 ug/m3 (1 hour average) for their respective averaging times. The information on the MDNR document says that the facility is well with the NAAQS ("National Ambient Air Quality Standards") which is a health-based limit. It also lists the NAAQS levels.

For NOx, the compressor station emissions are approximately 2% of the standard and the CO levels are about 0.1% or less of the NAAQS levels. In the South Harper air permit to construct, the modeled NOx concentrations are 0.39 ug/m3 and the CO concentrations are 24.8 and 76.3 ug/m3. A comparison between the existing compressor station health impacts to the South Harper health impacts shows the South Harper NOx levels are 5 times lower than the compressor station health impacts and approximately 0.4% of the NAAQS. The CO levels from South Harper are between 2 and 4 times the compressor station levels but still only 0.25 % or less of the health based NAAQS levels. The South Harper as built plant impacts with actual emission levels are even lower than the MDNR modeled permitted levels. Burns & McDonnell (as noted in the September 23, 2005 memo in Aquila's Special Use Permit application) performed the as-built modeling using the same parameters as they did with the air permit application which resulted in NOx emission impacts of 0.02 ug/m3 and CO emission impacts of 15.8 and 58.4 ug/m3. Using the as-built plant impacts, we find that the South Harper NOx impacts are 10 times less than the existing compressor station impacts. CO

impacts from S. Harper are approximately equal for the eight hour average, but are 3 times the compressor station impacts for the one hour average. We believe pollutant impacts from the compressor and the South Harper facility are both small and of a similar level.

Q. At page 7 of his rebuttal testimony, Mr. Stanley says that the S. Harper facility's air emissions total 558 pounds per hour of pollutants as permitted by the Missouri DNR. Is this emissions level consistent with a residential area?

A. Yes. Since the 1950's, this neighborhood has had an industrial source that emits breathable emission levels comparable to the South Harper plant. See response to Question 2. However, even if the maximum concentrations of both the compressor station and the South Harper plant occurred at the same time and location, the impacts are still less that 3% of the NOx and CO health impact threshold levels established by the NAAQS.

Q. On page 9 of his testimony, Mr. Stanley says that the emissions from the South Harper plant are equivalent to 1000 trucks. How do you respond?

A. Aquila does not believe that the health impact or noise of 1000 trucks is comparable to the South Harper facility. Missouri Department of Natural Resources, the Environmental Protection Agency and internationally recognized toxicologists have already agreed that there are no significant health issues associated with the plant. The air impacts from the existing compressor station are comparable to the South Harper plant. Burns & McDonnell's noise study in August, 2005 has stated that the Aquila plant meets all Cass County noise levels at the property boundary.

Q. Also, on page 10 of his testimony, Mr. Stanley contends that the unpaved road equation used for comparison in your testimony is not valid. How do you respond?

A. The unpaved road equation can be used for either dirt, gravel or a mixture of the two road types.

Q. On page 11 of his testimony, Mr. Stanley raises concerns that particulate matter emissions are only 4% of the total South Harper emissions. What about the other pollutants?

A. Almost 90% of the facility emissions are either NOx or CO emissions. As stated earlier in, these pollutant impacts are similar to the adjacent compressor station impacts. The VOC and SO2 emissions comprise about 4 % of the emissions and their impact was considered insignificant by MDNR. The hazardous air pollutants were tested and evaluated. The emissions were considered to have no adverse health impacts by toxicologists Dr. Duoll and Dr. Rozman as well as Missouri DNR and EPA.

Q. On page 12 of his testimony, discusses the October 2004 Burns & McDonnell report, which shows predicted noise levels above the Cass County residential noise ordinance levels. Please explain.

A. Aquila has had five noise studies performed for the South Harper facility. The first noise study was performed by Burns & McDonnell prior to construction. Three additional post operational studies were performed by Burns & McDonnell and one study by ATCO. The October 2004 noise study was a pre-construction noise study. The intent of the study was to give Aquila an idea of approximate

sound levels expected during operation. The noise study uses a noise model to approximate the noise levels. The model used conservative estimates (high noise levels) for projected the resulting noise levels. The model showed that one of the highest noise sources was emitted from the exhaust stack and ductwork. As a result of this study, Aquila decided to install stacks that emitted less noise. Operational noise levels measured by Burns & McDonnell and ATCO are below the October 2004 modeled noise levels. In fact, Burns & McDonnell did a noise study in August, 2005 that finds that the operational noise levels met Cass County noise ordinances at the property boundary.

Q. What about low frequency noise, specifically around 31.5 Hz

A. It should be noted that the county has no prohibition on low frequency noise levels. However, Aquila recognized that noise was a concern based on the public meetings held in the Fall of 2004. The majority of low frequency noise is emitted through the stack ductwork. When Aquila was specifying the stack noise levels, we had a choice of stacks. Aquila spent almost $1.5 million more to install the quieter stacks than those used in the standard stack configuration. This decision was made specifically to mitigate low frequency and total noise levels. In Burns & McDonnell's operational noise study (Exhibit HRS-6), the intent of the study is to verify that the stack manufacturer (Higgott-Kane) meets pre-specified low frequency (31.5 Hz) and total noise levels (dBA). The results of the study confirmed the stack manufacturer met their noise guarantees. ATCO measured noise at six residences near the plant site. Actual measured low frequency noise by ATCO at the nearest residence shows a 65 dB level for the 31.5Hz band at the

nearest residence. At a further distance from the plant, Burns & McDonnell shows the 31.5 Hz level at about 54 dB at 241st Street.

Q. Another Burns & McDonnell study cited by Mr. Stanley (Exhibit HRS-6, Appendix D, Table D-4) purports to show a dramatic increase in low frequency noise levels when the plant is operating. Please explain.

A. Page 4 of the report explains that the noise measured during operation included noise from the compressor station (which was operating), construction equipment and other noise sources. These other sources would produce significant low frequency noise and the location of these sources are all within a few hundred feet of the measurement location. Therefore, the increase in low frequency noise is not all attributable to the South Harper plant. In fact, in FERC Docket CP00-82-000 (see attachment B), neighbors were concerned about vibrations from the compressor station operation. Although it appears that some of the vibrational issues were to be "minimized" in the future, the compressor station's response was that the vibration is only of a short duration. Noise measurements taken in 2000 show the 31.5 Hz band recorded levels as high as 70 dB at a nearby residence.

Q. Does this conclude your pre-filed surrebuttal testimony?

A. Yes, it does.

Spellcheck	
Grammar Check	
Tech Review	
Supervisor Review	
Program: AP	
County: CASS	
File Name: Southern STAR C037-0048	

Circle Folder Tag Color

RED YELLOW BLUE (GREEN) PURPLE

STATE OF MISSOURI
DEPARTMENT OF

JUN 28 2005

CERTIFIED MAIL: 7001 2510 0005 7349 1216
RETURN RECEIPT REQUESTED

Mr. Bruce Lurtz
District Manager
Southern Star Central Pipeline
Peculiar Compressor Station
24304 S. Harper St.
Peculiar, MO 64078

Re: Intermediate Source Operating Permit Number: **OP 2005-008**
Effective Date: JUN 24 2005
Expiration Date: JUN 23 2010
Installation ID: 037-0048

Dear Mr. Lurtz:

The Department of Natural Resources' Air Pollution Control Program has completed its review of your application for an Intermediate Operating Permit. This application is complete and is *accepted* as your Air Operating Permit. Please note that you are required to operate your installation under the terms as submitted and outlined in your application. It is very important that you read and understand this legal document.

You are required to file a compliance report annually by April 1st, 2005 for the previous twelve month period. A blank copy of the form(s) is attached. Pursuant to Missouri State Rule 10 CSR 10-6.065, *Operating Permits,* this operating permit is effective for a term of five years from the date of this letter. You are required to submit an application for renewal of this operating permit at least six months prior to the expiration date (indicated above).

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JUN 30 2005

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If you have any questions regarding this matter, please contact the Air Pollution Control Program Operating Permits Unit 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. Thank you for your time and attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Leanne Tippett Mosby
Director

LTM:ssb

Enclosure(s)

c: Mr. Dan Rodriguez, U.S. EPA Region VII
Mr. Richard Vani, Kansas City Regional Office
PAMS File: 2001-06-036

Copy

FILE COPY

2000-06-036

State of Missouri
Department of Natural Resources
Air Pollution Control Program
P.O. Box 176
Jefferson City, MO 65102

OFFICE USE ONLY	
FILING FEE	
CHECK NO. 500717	CHECK RECEIVED 6/11/01
CHECK AMOUNT $ 100.00	CHECK DATE 6/8/01
PROJECT NUMBER	

FORM OP - A01 APPLICATION FOR AUTHORITY TO OPERATE

All applications MUST be in duplicate and accompanied by a single $100 filing fee

Section A - General Application Information

1 Facility Name	County No.	Plant No.	Year Submitted
Peculiar Compressor Station	0840	0048	2001

Facility Street Address	County Name
24304 S. Harper St.	Cass

City	State	Mail (ZIP) Code	Facility Phone No.
Peculiar	MO	64078	(816) 758-6612

Facility Mailing Address	Facility Fax No.
24304 S. Harper St.	(816) 758-6613

City	State	Mail (ZIP) Code	Mo. Senatorial District No.
Peculiar	MO	64078	31

Facility Contact Person	Mo. Representative District No.
Bruce Lurtz	123

Contact Person Title	¼	¼	Section	Township	Range
District Manager			29 &32	45N	32W

2 Parent Company Name	Contact Person	Phone No.
Williams Gas Pipelines Central, Inc.	Ed D. Mize	(918) 633-2788

Mailing Address	City	State	Mail (ZIP) Code
P.O. Box 20008	Owensboro	KY	42304-0008

Type of Application (Check one box each for 3 and 4)

3 ☐ Part 70 (Major ☒ Intermediate State ☐ Basic State

4 ☒ Initial ☐ Renewal (Current Permit No. _____) ☐ Minor Permit Modification

☐ De minimis Modification ☐ Significant Permit Modification ☐ Administrative Amendment

5 **Applicant's Certification Statement**

"I certify, based on information and belief formed after reasonable inquiry, the statements and information in this document are true, accurate and complete."

Signature of Responsible Official of Company	Date
[signature]	6/7/2001
Type or Print Name of Signer: Robert S. Bahnick	
Official Title of Signer: Vice President - Operations	Telephone: (270) 926-8686

RECEIVED
Date: 06/11/01
Expires: 06/11/06
Staff: AD
MDNR-APCP

RECEIVED

FORM OP - A02 APPLICATION FOR AUTHORITY TO OPERATE Section A

Facility Name	County No.	Plant No.	Year Submitted
Peculiar Compressor Station	0840	0048	2001

Section A - Continued

List all the facility's principal product and processes

		Two-Digit SIC Code
6	Principal Product: Natural Gas	49
7	Processes: Natural Gas Transmission	49

8. Are Alternative Operating Scenarios for any Emission Unit included with this Application?

Yes _____ No _____ (If Yes, you MUST complete Section D.2 of FORM OP - D03 of this Application)

9. Has this facility submitted an Emission Inventory Questionnaire (EIQ)?

Yes X No _____ If Yes, date of most recent EIQ: 2000

If No, submit two copies of a completed EIQ with this application and complete the following section.

Emission Inventory - (Section B) *Indicate the number of each form submitted with application.*

_____	1.1	PROCESS FLOW DIAGRAM	_____	2.4	PETROLIUM LOADING WORKSHEET
_____	1.2	SUMMARY OF EMISSION POINTS	_____	2.5	ORGANIC LIQUID STORAGE-FIXED ROOF TANK
_____	2.0	EMISSION POINT INFORMATION	_____	2.5L	GENERAL LIQUID STORAGE TANK INFORMATION
_____	2.0C	CONTROL DEVICE INFORMATION	_____	2.6	ORGANIC LIQUID STORAGE-FLOATING ROOF TANK
_____	2.0P	PORTABLE PLANT INFORMATION	_____	2.7	HAUL ROAD FUGITIVE EMISSIONS WORKSHEET
_____	2.0S	STACK INFORMATION	_____	2.8	STORAGE PILE WORKSHEET
_____	2.0Z	OZONE SEASON INFORMATION	_____	2.9	STACK TEST/CONTINUOUS EMISSION MONITORING WORKSHEET
_____	2.1	FUEL COMBUSTION WORKSHEET			
_____	2.2	INCINERATOR WORKSHEET	_____	2.T	HAZARDOUS AIR POLLUTANT WORKSHEET
_____	2.3	VOC PROCESS MASS-BALANCE WORKSHEET			

10. Indicate the Number and Type of each form attached as part of this application

Insignificant Activities - (Section C)

0	OP-	INSIGNIFICANT ACTIVITIES NOT REQUIRED TO BE LISTED	0	OP-C03	LIST OF INSIGNIFICANT ACTIVITIES
0	OP-	INSIGNIFICANT ACTIVITIES REQUIRED TO BE LISTED			

Emission Unit Information - (Section D)

1	OP-	EXISTING PLANT- WIDE PERMIT CONDITIONS	1	OP-D04	APPLICABLE REQUIREMENTS
1	OP-	PROPOSED PLANT-WIDE PERMIT CONDITIONS	4	OP-D05	COMPLIANCE DETERMINATION METHODS
4	OP-	EMISSION UNIT INFORMATION			

Compliance Plan, Status and Certification - (Section E)

1	OP-E01	COMPLIANCE PLAN/STATUS	1	OP-E02	COMPLIANCE CERTIFICATION STATEMENT

General Comments and Completeness Checklist - (Section F)

1	OP-F01	GENERAL COMMENTS	1	OP-F02	COMPLETENESS CHECKLIST

Facility Name	County No.	Plant No.	Year Submitted
Peculiar Compressor Station	0840	0048	2001

Department of Natural Resources, Division 10 - Air Conservation Commission

Group I - Federal/State/Local Regulations

Applicability				
Yes	No	Reason		
____	✓	J	**Chapter 1:**	**Organization**
			TITLE	
____	____	____	10 CSR 10-1.010	Organization[8]→*see legend in the instructions*
X	____	____	**Chapter 2:**	**Air Quality Standards and Air Pollution Control Rules Specific to the Kansas City Metropolitan Area**
			TITLE	
____	X	E	10 CSR 10-2.030	Restriction of Emission of Particulate Matter from Industrial
____	X	E	10 CSR 10-2.040	Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating[1]
____	X	K	10 CSR 10-2.060	*Restriction of Emission of Visible Air Contaminants*[9]
X	____	____	10 CSR 10-2.080	Emission of Visible Air Contaminants From Internal Combustion
X	____	____	10 CSR 10-2.100	Open Burning Restrictions[8]
____	X	J	10 CSR 10-2.150	*Time Schedule for Compliance*[8]
____	X	K	10 CSR 10-2.160	Restrictions of Emission of Sulfur Compounds[2]
____	X	K	10 CSR 10-2.200	Restriction of Emission of Sulfur Compounds From Indirect Heating Sources[2]
____	X	E	10 CSR 10-2.210	Control of Emissions From Solvent Metal Cleaning[4]
____	X	B	10 CSR 10-2.220	Liquefied Cutback Asphalt Paving Restricted[4]
____	X	B	10 CSR 10-2.230	Control of Emissions From Industrial Surface Coating Operations[4]
____	X	E	10 CSR 10-2.260	*Control of Petroleum Liquid Storage, Loading and Transfer*[4]
____	X	B	10 CSR 10-2.280	Control of Emissions From Perchloroethylene Dry Cleaning
____	X	B	10 CSR 10-2.290	Control of Emissions From Rotogravure and Flexographic Printing Facilities[4]
____	X	B		
____	X	B	10 CSR 10-2.300	Control of Emissions From the Manufacturing of Paints, Varnishes, Lacquers, Enamels and Other Allied Surface Coating Products[4]
____	X	B	10 CSR 10-2.310	Control of Emissions From the *Application of Automotive Underbody* Deadeners[4]
____	X	B	10 CSR 10-2.320	Control of Emissions From Production of Pesticides and Herbicides[4]
____	X	B	10 CSR 10-2.340	Control of Emissions From *Lithographic Printing Facilities*[4]
____	X	B	10 CSR 10-2.360	Control of Emissions From Bakery Ovens[4]
____	X	J	10 CSR 10-2.390	Conformity to State Implementation Plans of Transportation Plans, *Programs*, and Projects Developed, Funded or Approved Under Title 23 U.S.C. or the Federal Transit Act[3,4,5]

FORM OP - A03 APPLICABLE REQUIREMENTS CHECKLIST - Continued

Facility Name	County No.	Plant No.	Year Submitted
Peculiar Compressor Station	0840	0048	2001

Applicability				
Yes	No	Reason		
			Group II - State Only or Local Agency Only Regulations	
X			10 CSR 10-2.070	Restriction of Emission of Odors[10]
			Group III - Federally Enforceable Regulations (not State or Local Enforceable)	
	X	K	10 CSR 10-2.050	Preventing Particulate Matter from Becoming Airborne
	X	K	10 CSR 10.2090	Incinerators

FORM OP - A03 APPLICABLE REQUIREMENTS CHECKLIST - Continued

Facility Name	County No.	Plant No.	Year Submitted
Peculiar Compressor Station	0840	0048	2001

Group I - Federal/State/Local Regulations

Applicability			
Yes	No	Reason	
____	X	D	**Kansas City Health Department, Air Quality Section** Chapter 8, Air Quality

TITLE

Group II - State Only or Local Agency Only Regulations

____	____	____	**Section 8-1**	**Title of Chapter**
____	____	____	**Section 8-2**	**Definitions**
____	____	____	**Section 8-3**	**Administration and Enforcement**
____	____	____	**Section 8-4**	**Open Burning Restriction**
____	____	____	**Section 8-5**	**Emission of Particulate Matter**
____	____	____	**Section 8-6**	**Restriction of Emission of Sulfur Compounds**
____	____	____	**Section 8-7**	**Restriction of Emission of odors**
____	____	____	**Section 8-8**	**Emission of Volatile Organic Compounds**
____	____	____	**Section 8-9**	**Restriction of Emission of Hazardous Air Pollutants**
____	____	____	**Section 8-10**	**Review of New Sources and Modifications; Permit for Construction or Major Modification**
____	____	____	**Section 8-11**	**Permit to Operate; Notification and Record Keeping**
____	____	____	**Section 8-12**	**Air Quality Control Board; appeals and variances**
____	____	____	**Section 8-13**	**Confidentiality Information**
____	____	____	**Section 8-14**	**Dilution of Emission**
____	____	____	**Section 8-15**	**Start-up, shutdown, and malfunction condition**
____	____	____	**Section 8-16**	**Actionable Rights; Violations Declared Public Nuisance**
____	____	____	**Section 8-17**	**Emergency Condition**
____	____	____	**Section 8-18**	**Rules for Controlling Emissions During Periods of High Air Pollution**
____	____	____	**Section 8-19**	**Penalties**
____	____	____	**Section 8-20**	**Fees**

Group III - Federally Enforceable Regulations (not State or Local Enforceable)

____	____	____	**Section 8-85**	**Open Burning Restrictions**
____	____	____	**Section 8-91**	**Incinerators**

Facility Name	County No.	Plant No.	Year Submitted
Peculiar Compressor Station	0840	0048	2001

Group I - Federal/State/Local Regulations

Applicability				
Yes	No	Reason		
	X	D	**Chapter 3:**	**Air Pollution Control Rules Specific to the Outstate Missouri Area**
			TITLE	
			10 CSR 10-3.010	**Auto Exhaust Emission Controls[8]**
			10 CSR 10-3.030	**Open Burning Restrictions[8]**
			10 CSR 10-3.050	**Restriction of Emission of Particulate Matter From Industrial**
			10 CSR 10-3.060	**Maximum Allowable Emissions of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating[1]**
			10 CSR 10-3.080	**Restriction of Emission of Visible Air Contaminants[9]**
			10 CSR 10-3.100	**Restriction of Emission of Sulfur Compounds[2]**
			10 CSR 10-3.150	**Restriction of Emissions of Sulfur Compounds From Indirect Heating Sources[2]**
			10 CSR 10-3.160	**Restriction of Emission of Fluorides From Diammonium Phosphate Fertilizer Production[7]**

Group II - State Only or Local Agency Only Regulations

			10 CSR 10-3.090	**Restriction of Emission of Odors[10]**

Group III - Federally Enforceable Regulations (not State or Local Enforceable)

			10 CSR 10-3.040	**Incinerators**
			10 CSR 10-3.070	**Restriction of Particulate Matter from Becoming Airborne**

FORM OP - A03 APPLICABLE REQUIREMENTS CHECKLIST - Continued

Facility Name	County No.	Plant No.	Year Submitted
Peculiar Compressor Station	0840	0048	2001

Group I - Federal/State/Local Regulations

Applicability				
Yes	No	Reason		
	X	D	Chapter 4:	Air Quality Standards and Air Pollution Control Regulations for the Springfield - Green County Area
			TITLE	
			10 CSR 10-4.030	Restriction of Emissions of Particulate Matter From Industrial Processes[1]
			10 CSR 10-4.040	Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating[1]
			10 CSR 10-4.060	Restriction of Emission of Visible Air Contaminants[9]
			10 CSR 10-4.090	Open Burning Restrictions[10]
			10 CSR 10-4.140	Time Schedule for Compliance[8]
			10 CSR 10-4.150	Restriction of Emissions of Sulfur Compounds[2]
			10 CSR 10-4.190	Restriction of Emission of Sulfur Compounds From Indirect Heating Sources[2]

Group II - State Only or Local Agency Only Regulations

			10 CSR 10-4.070	Restriction of Emission of Odors[10]

Group III - Federally Enforceable Regulations (not State or Local Enforceable)

			10 CSR 10-4.050	Preventing Particulate Matter from Becoming Airborne
			10 CSR 10-4.080	Incinerators

FORM OP - A03 APPLICABLE REQUIREMENTS CHECKLIST - Continued

Facility Name	County No.	Plant No.'	Year Submitted
Peculiar Compressor Station	0840	0048	2001

Group I - Federal/State/Local Regulations

Applicability			
Yes	No	Reasons	
_____	X	D	City of Springfield, Air Pollution Control Authority - Chapter 2A Air

TITLE

Group II - State Only or Local Agency Only Regulations

_____	_____	_____	Article I	In General
_____	_____	_____	Article II	Administrative Organization
_____	_____	_____	Article III	Approval of Planned Installations
_____	_____	_____	Article IV	Restriction of Emission of Visible Air Contaminants from Equipment
_____	_____	_____	Article V	Emission of Particulate Matter from Fuel Burning Equipment
_____	_____	_____	Article VI	Restriction of Emission of Particulate Matter from Industrial Processes
_____	_____	_____	Article VII	Stack Emission Test Method
_____	_____	_____	Article VIII	Open Burning
_____	_____	_____	Section 2A-32	Emergency Issuance of Permits to Burn Vegetative Waste
_____	_____	_____	Article X	Control of Odors in the Ambient Air
_____	_____	_____	Article XI	Nuisances Because of Air Pollution
_____	_____	_____	Article XII	Submission of Information
_____	_____	_____	Article XIII	Variance Provisions
_____	_____	_____	Article XIV	Sealing
_____	_____	_____	Article XV	Hearing
_____	_____	_____	Article XVI	Breakdown of Equipment
_____	_____	_____	Article XVII	Circumvention
_____	_____	_____	Article XVIII	Service of Orders or Notices
_____	_____	_____	Article XIX	Enforcement of This Chapter
_____	_____	_____	Article XX	Test Methods and Tables

Group III - Federally Enforceable Regulations (not State or Local Enforceable)

_____	_____	_____	Article IX	Incinerator

Facility Name	County No.	Plant No.	Year Submitted
Peculiar Compressor Station	0840	0048	2001

Group I - Federal/State/Local Regulations

Applicability				
Yes	No	Reason		
	X	D	Chapter 5:	Air Quality Standards and Air Pollution Control Rules Specific to the St. Louis Metropolitan Area
			TITLE	
			10 CSR 10-5.030	Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating[1]
			10 CSR 10-5.040	Use of Fuel in Hand-Fired Equipment Prohibited[8]
			10 CSR 10-5.050	Restriction of Emission of Particulate Matter From Industrial Processes[1]
			10 CSR 10-5.070	Open Burning Restrictions[8]
			10 CSR 10-5.090	Restriction of Emission of Visible Air Contaminants[9]
			10 CSR 10-5.110	Restrictions of Emission of Sulfur Dioxide for Use of Fuel[2]
			10 CSR 10-5.120	Information on Sales of Fuels to be Provided and Maintained[8]
			10 CSR 10-5.130	Certain Coals to be Washed[8]
			10 CSR 10-5.150	Emission of Certain Sulfur Compounds Restricted[2]
			10 CSR 10-5.180	Emission of Visible Air Contaminants From Internal Combustion Engine[9]
			10 CSR 10-5.220	Control of Petroleum Liquid Storage, Loading and Transfer[4]
			10 CSR 10-5.240	Additional Air Quality Control Measures May be Required When Sources Are Clustered in a Small Land Area[1,2]
			10 CSR 10-5.250	Time Schedule for Compliance[8]
			10 CSR 10-5.290	More Restrictive Emission Limitations for Particulate Matter in the South St. Louis Area[1]
			10 CSR 10-5.300	Control of Emissions From Solvent Metal Cleaning[4]
			10 CSR 10-5.310	Liquefied Cutback Asphalt Paving Restricted[4]
			10 CSR 10-5.320	Control of Emissions From Perchloroethylene Dry Cleaning Installations[4]
			10 CSR 10-5.330	Control of Emissions From Industrial Surface Coating Operations[4]
			10 CSR 10-5.340	Control of Emissions From Rotogravure and Flexographic Printing Facilities[4]
			10 CSR 10-5.350	Control of Emissions From Manufacture of Synthesized Pharmaceutical Products[4]
			10 CSR 10-5.360	Control of Emissions From Polyethylene Bag Sealing Operations[4]
			10 CSR 10-5.370	Control of Emissions From the Application of Deadeners and Adhesives[4]
			10 CSR 10-5.380	Motor Vehicle Emissions Inspection[8]
			10 CSR 10-5.390	Control of Emissions From Manufacturing of Paints, Varnishes, Lacquers, Enamels and Other Allied Surface Coating Products[4]
			10 CSR 10-5.410	Control of Emissions From Manufacture of Polystyrene Resin[4]
			10 CSR 10-5.420	Control of Equipment Leaks From Synthetic Organic Chemical and Polymer Manufacture Plants[4]

FORM OP - A03 APPLICABLE REQUIREMENTS CHECKLIST - Continued

Facility Name	County No.	Plant No.	Year Submitted
Peculiar Compressor Station	0840	0048	2001

Applicability				
Yes	No	Reasons		
____	____	____	10 CSR 10-5.440	Control of Emissions from Bakery Ovens[4]
____	____	____	10 CSR 10-5.442	Control of Emissions from Lithographic Printing Operations[4]
____	____	____	10 CSR 10-5.443	Control of Gasoline Reid Vapor Pressure[4]
____	____	____	10 CSR 10-5.450	Control of VOC Emissions from Traffic Coatings[4]
____	____	____	10 CSR 10-5.451	Control of Emissions from Aluminum Foil Rolling[4]
____	____	____	10 CSR 10-5.455	Control of Emission from Solvent Cleanup Operations[4]
____	____	____	10 CSR 10-5.480	Conformity to State Implementation Plans of Transportation Plans, Programs, and Projects Developed, Funded, or Approved Under Title 23 U.S.C. or the Federal Transit Act[3,4,5]

Group II - State Only or Local Agency Only Regulations

____	____	____	10 CSR 10-5.160	Control of Odors in the Ambient Air[10]
____	____	____	10 CSR 10-5.170	Control of Odors From Processing of Animal Matter[10]
____	____	____	10 CSR 10-5.430	Control of Emissions From the Surface Coating of Chrome-Plated and Resist Plastic Parts (*Applies only to Seigel-Robert Plating Company, Inc. located at 8645 South Broadway, St. Louis, Missouri.*)

Group III - Federally Enforceable Regulations (not State or Local Enforceable)

____	____	____	10 CSR 10-5.060	Refuse not to be Burned in Fuel Burning Installations
____	____	____	10 CSR 10-5.080	Incinerators
____	____	____	10 CSR 10-5.100	Preventing Particulate Matter from Becoming Airborne

FORM OP - A03 APPLICABLE REQUIREMENTS CHECKLIST - Continued

Facility Name	County No.	Plant No.	Year Submitted
Peculiar Compressor Station	0840	0048	2001

Group I - Federal/State/Local Regulations

Applicability			
Yes	No	Reason	
____	X	D	St. Louis County Department of Health, Air, Land & Water Branch, Air Pollution Control Section Chapter 612 - Air Pollution Control Code

TITLE

Group II - State Only or Local Agency Only Regulations

____	____	____	612.010	Short Title
____	____	____	612.020	Scope
____	____	____	612.030	Definitions
____	____	____	612.040	Air Quality Standards and Air Pollution Control Regulations
____	____	____	612.050	Division of Air Pollution Control Established
____	____	____	612.060	Director of Air Pollution Control - Duties
____	____	____	612.070	Appeal Board Establishment
____	____	____	612.080	Duties of the Appeal Board
____	____	____	612.090	Board of Consider Appeal
____	____	____	612.100	Emergency Abatement of Violation - Procedure
____	____	____	612.110	Permits Required
____	____	____	612.120	Permits to be Visibly Affixed or Placed
____	____	____	612.130	Permit to Sell or Rent
____	____	____	612.140	Transfer
____	____	____	612.150	Permit to Operate - When Required
____	____	____	612.160	General Requirements for Applications for Authority to Construct and Operating Permits
____	____	____	612.170	Information Required for Application for Permits
____	____	____	612.180	Standards for Granting Permits
____	____	____	612.190	Cancellation of Authority to Construct
____	____	____	612.200	Testing Prior to Granting of Operating Permits
____	____	____	612.210	Action on Application for Permits
____	____	____	612.220	Suspension or Revocation of Permits
____	____	____	612.230	Suspension or Revocation of Operating Permits or Authority to Construct, Board Hearing, Stay of Action
____	____	____	612.240	Surrender of Permits
____	____	____	612.250	Fees, When Payable, Exceptions
____	____	____	612.260	Permit Fees; Schedules
____	____	____	612.270	Permit Fees; Refund
____	____	____	612.280	Testing by Order of the Board
____	____	____	612.290	Right of Entry; Inspections; Samples
____	____	____	612.300	Variances

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Applicability				
Yes	No	Reason		
____	____	____	612.310	**Upset Conditions, Breakdown, or Scheduled Maintenance**
____	____	____	612.320	**Service of Notice**
____	____	____	612.330	**Reports of Division Technical Experts; Presumptive Evidence of Facts**
____	____	____	612.340	**Air Pollution Nuisances Prohibited**
____	____	____	612.350	**Disclosure of Secret Processes Prohibited**
____	____	____	612.360	**Disclosure of Secret Processes. Penalty for**
____	____	____	612.370	**False or Misleading Oral Statements; Unlawful Reproduction or Alteration of Documents**
____	____	____	612.380	**Interfering with or Obstructing Division Personnel**
____	____	____	612.390	**Penalties for Violation**
____	____	____	612.400	**Construction**

Group III - Federally Enforceable Regulations (not State or Local Enforceable)

FORM OP - A03 APPLICABLE REQUIREMENTS CHECKLIST - Continued

Facility Name	County No.	Plant No.	Year Submitted
Peculiar Compressor Station	0840	0048	2001

Group I - Federal/State/Local Regulations

Applicability				
Yes	No	Reason		
____	X	D	City of St. Louis, Div. of Air Pollution Control	
			TITLE	

Group II - State Only or Local Only Regulations

____	____	____	Ordinance 50163	
____	____	____	Section 4	Division of Air Pollution Control Created
____	____	____	Section 5	Continuation of Division of Smoke Regulation
____	____	____	Section 6	Powers and Duties of Smoke Commissioner
____	____	____	Section 7	Qualifications, Powers, and Duties
____	____	____	Section 8	Appointment of Other Employees
____	____	____	Section 9	Board of Air Pollution Control
____	____	____	Section 10	Powers and Duties of the Board
____	____	____	Section 11	Importation, Sale, Transport of Coals
____	____	____	Section 12	Requirements as to Railroad Engines Locomotives
____	____	____	Section 13	Emission of Dense Smoke Prohibited
____	____	____	Section 14	Emission of Fly Ash and Other PM Regulated
____	____	____	Section 15	When Emissions of Pollutants Become a Nuisance
____	____	____	Section 16	Tests to Determine Quantity of Pollutants
____	____	____	Section 17	Registration of Sources of Air Pollution
____	____	____	Section 18	Permits for Fuel or Refuse Burning Equipment
____	____	____	Section 19	Labels to be Affixed to Approved Installations
____	____	____	Section 20	Dealers in Refuse or Fuel Burning Devises
____	____	____	Section 21	Commissioner to Approve Plans and Issue Permits
____	____	____	Section 22	Amended by 55293
____	____	____	Section 23	Commissioner May Enter Premises
____	____	____	Section 24	Sealing of Violating Equipment: Hearing Before Declaring a Nuisance
____	____	____	Section 25	Public Hearing May Be Held
____	____	____	Section 26	Appeals: Method of Taking
____	____	____	Section 27	Penalty Clause
____	____	____	Section 28	Separability Clause
			Ordinance 55293	
____	____	____	Section 1	Amendment of Section 22 of 50163 - Fees
			Ordinance 59270	
____	____	____	Section 1	Short Title
____	____	____	Section 2	Repealer

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Applicability				
Yes	No	Reason		
____	____	____	Section 3	Declaration of Policy
____	____	____	Section 4	*Definitions*
____	____	____	Section 5	Commissioner of Air Pollution Control Qualifications
____	____	____	Section 6	Commissioner of Air Pollution Powers and Duties
____	____	____	Section 7	Board of Air Pollution Appeals and Variance Review
____	____	____	Section 8	Maximum Allowable PM from Indirect Heating
____	____	____	Section 9	Use of Hand Fired Equipment Prohibited
____	____	____	Section 10	Amended by 60023
____	____	____	Section 11	Restriction of Emissions of PM from Existing Foundry Cupolas
____	____	____	Section 12	Open Burning Restrictions
____	____	____	Section 13	Incinerators
____	____	____	Section 14	Restriction of Emission of Visible Air Contaminants
____	____	____	Section 15	Preventing Air Contaminants from Becoming Air-borne
____	____	____	Section 16	Restriction of the Emission of SO2 from Use of Fuel
____	____	____	Section 17	Importation, Sale, Transportation, Use of Certain Coals
____	____	____	Section 18	Information on Sales of Fuels to be Provided and Maintained
____	____	____	Section 19	Amended by 60023
____	____	____	Section 20	*Control of Odors in the Ambient Air*
____	____	____	Section 21	Control of Odors from Processing of Animal Matter
____	____	____	Section 22	Air Pollution Nuisance Prohibited
____	____	____	Section 23	Amended by 60023
____	____	____	Section 24	Liquefied Cutback Asphalt Paving Restricted
____	____	____	Section 25	Control of Emissions from Rotogravure and Flexographic Printing
____	____	____	Section 26	Amended by 60023
____	____	____	Section 27	Control of Emission from Pharmaceutical manufacture
____	____	____	Section 28	Control of Emissions from Solvent Metal Cleaning
____	____	____	Section 29	Control of Emissions from Perc Dry Cleaning
____	____	____	Section 30	Control of Emissions from Polyethylene Bag Sealing
____	____	____	Section 31	Amended by 60023
____	____	____	Section 32	Amended by 60023
____	____	____	Section 33	*Emergency Procedures*
____	____	____	Section 34	Rules for Controlling Emissions During Periods of High Air Pollution
____	____	____	Section 35	Location and height of Discharge of Air Contaminants
____	____	____	Section 36	*Measurements of Emissions of Air Contaminants*
____	____	____	Section 37	Upset Conditions, Breakdown or Scheduled Maintenance
____	____	____	Section 38	Variances
____	____	____	Section 39	*Permits and Inspection Fees*
____	____	____	Section 40	Rules Governing Sources in Non-Attainment Areas and PSD in Attainment Areas
____	____	____	Section 41	*Alternate Emission Limits*
____	____	____	Section 42	Enforcement

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Applicability				
Yes	No	Reason		
____	____	____	Section 43	Right of Inspection and Disclosure of Production Data
____	____	____	Section 44	Confidentiality of Records
____	____	____	Section 45	Cooperation Required
____	____	____	Section 46	Circumvention
____	____	____	Section 48	Penalty Clause
____	____	____	Section 49	Severability
____	____	____	Section 50	Emergency Clause
			Ordinance 60023	
____	____	____	Section 1	Amendment of Section 10 of Ordinance 59270 - Restriction of PM from Industrial Processes
____	____	____	Section 2	Amendment of Section 19 of Ordinance 59270 -Control of Emissions from Coke Manufacturing
____	____	____	Section 3	Amended by 60629
____	____	____	Section 4	Amendment of Section 26 of Ordinance 59270 - Control of Emissions from Industrial Surface Coating Operations
____	____	____	Section 5	Amended by 60629
____	____	____	Section 6	Control of Emissions from Manufacture of Paints, Varnishes, Lacquers, Enamels and Other Allied surface Coating Products
____	____	____	Section 7	Control of Emissions from the Use of Deadeners and adhesives
____	____	____	Section 8	Control of Emission from Manufacture of Polystyrene Products
____	____	____	Section 9	Control of Emissions from Production of Maleic Anhydride
____	____	____	Section 10	Continuation
____	____	____	Section 11	Penalty Clause
____	____	____	Section 12	Severability
			Ordinance 60629	
____	____	____	Section 1	Amendment of Section 3 of Ordinance 60023 - Control of Petroleum Liquid - Storage, Loading, and transfer
____	____	____	Section 2	Amendment of Section 5 of Ordinance 60023 - New Performance Standards Adopted
____	____	____	Section 3	Amendment of Section 32 of Ordinance 59270 - National Emission Standards for Hazardous Air Pollutants Adopted
____	____	____	Section 4	Restriction of Emissions Credit for Reduced Pollutant Concentrations from the Use of Dispersion Techniques
____	____	____	Section 5	Control of Equipment Leaks from SOCMI and Polymer Manufacture
____	____	____	Section 6	Continuation
____	____	____	Section 7	Penalty Clause
____	____	____	Section 8	Severability
Group III- Federally Enforceable Regulations (not State or Local Enforceable)				
____	____	____	Ordinance 54699	Section 13 Refuse Burning Prohibited in Fuel Plant

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Applicability					
Yes	No	Reason			
____	____	____	Ordinance 54699	Section 14	Open Burning, Salvage, Trade Waste
____	____	____	Ordinance 54699	Section 15	Incinerator Requirements

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Group I - Federal/State/Local Regulations

Applicability				
Yes	No	Reason		
X			Chapter 6:	Air Quality Standards, Definitions, Sampling and Reference Methods and Air Pollution Control Regulations for the Entire State of Missouri
			TITLE	
	✓	J	10 CSR 10-6.010	Ambient Air Quality Standards[1,2,3,5,6,7]
	✓	J	10 CSR 10-6.020	Definitions and Common Reference Tables[8]
	✓	J	10 CSR 10-6.030	Sampling Methods for Air Pollution Sources[8]
	✓	J	10 CSR 10-6.040	Reference Methods[8]
✓			10 CSR 10-6.050	Start-Up, Shutdown and Malfunction Conditions[9]
	X	G	10 CSR 10-6.060	Construction Permits Required[9]
X			10 CSR 10-6.065	Operating Permits Required[9]
X			10 CSR 10-6.070	New Sources Performance Regulations (See page for a complete listing; 40 CFR part 60)[12]
	X	B	10 CSR 10-6.075	Maximum Achievable Control Technology Regulations (See page for a complete listing; 40 CFR part 63)[11]
	X	B	10 CSR 10-6.080	Emission Standards for Hazardous Air Pollutants (See page for a complete listing; 40 CFR part 61)[11]
	X	A	10 CSR 10-6.090	Restriction of Emission of Fluorides From Primary Aluminum Reduction Installations[7]
	X	C	10 CSR 10-6.100	Alternate Emission Limits[4]
✓			10 CSR 10-6.110	Submission of Emission Data, Emission Fees and Process
	X	B	10 CSR 10-6.120	Restriction of Emission of Lead From Primary Lead Smelter-Refinery Installations[8]
✓			10 CSR 10-6.130	Controlling Emissions During Episodes of High Air Pollution Potential[9]
	✓	J	10 CSR 10-6.140	Restriction of Emissions Credit for Reduced Pollutant Concentrations From the Use of Dispersion Techniques[8]
✓			10 CSR 10-6.150	Circumvention[8]
X			10 CSR 10-6.180	Measurement of Emissions of Air Contaminants[8]
	X	J	10 CSR 10-6.210	Confidential Information[8]
	✓	J	10 CSR 10-6.230	Administrative Penalties[8]
	X	H	10 CSR 10-6.240	Asbestos Abatement Projects - Registration, Notification and Performance Requirements[7]
	X	H	10 CSR 10-6.250	Asbestos Abatement Projects - Certification, Accreditation and Business Exemption Requirements[7]
	X	H	10 CSR 10-6.260	Restriction of Emission of Sulfur Compounds[2]
	X	B	10 CSR 10-6.270	Acid Rain Source Permits Required[2,3]
	✓	J	10 CSR 10-6.280	Compliance Monitoring Usage[9]
	✓	J	10 CSR 10-6.300	Conformity of General Federal Actions to State Implementation Plans[9]

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Group II - State Only or Local Agency Only Regulations

Applicability				
Yes	No	Reason		
X			10 CSR 10-6.170	Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin[1]

Group III - Federally Enforceable Regulations (not State or Local Enforceable)

			40 CFR Part 63 National Emission Standards for Hazardous Air Pollutants for Source Categories	
	X	B	Subpart DD	Off-Site Waste and Recovery Operations
	X	B	Subpart KK	Printing and Publishing Industry
	X	B	Subpart U & W	Polymer & Resin
	X	B	Subpart JJJ	Polymer & Resin
			40 CFR Part 60 New Source Performance Standards	
	X	B	Subpart JJ	Cold Cleaning Machine Operations
	X	B	Subpart Cc	Emission Guidelines and Compliance Times for Municipal Solid Waste Landfills
	X	B	Subpart WWW	Municipal Solid Waste Landfills
	X	B	Subpart Eb	Municipal Waste Combustors
	X	K	40 CFR Part 68 Chemical Accident Prevention Provisions	
X			40 CFR Part 82 Protection of Stratospheric Ozone	

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Applicability			
Yes	No		
		New Source Performance Regulations - 10 CSR 10-6.070 *(40 CFR Part 60 New Source Performance Standards)*	
	X	Subpart D	Fossil-Fuel Fired Steam Generators
	X	Subpart Da	Electric Utility Steam Generating Units
	X	Subpart Db	Industrial-Commercial-Institutional Steam Generating Units
	X	Subpart Dc	Small Industrial-Commercial-Institutional Steam Generating Units
	X	Subpart E	Incinerators
	X	Subpart F	Portland Cement Plants
	X	Subpart G	Nitric Acid Plants
	X	Subpart H	Sulfuric Acid Plants
	X	Subpart I	Asphalt Concrete Plants
	X	Subpart J	Petroleum Refineries
	X	Subpart K	Storage vessels for Petroleum Liquids after June 11, 1973
	X	Subpart Ka	Storage Vessels for Petroleum Liquids
	X	Subpart Kb	Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) after July 23, 1984
	X	Subpart L	Secondary Lead Smelters
	X	Subpart M	Secondary Brass and Bronze Production Plants
	X	Subpart N	Primary Emissions from Basic Oxygen Process Furnaces
	X	Subpart Na	Primary Emissions from Basic Oxygen Process Steelmaking Facilities
	X	Subpart O	Sewage Treatment Plants
	X	Subpart P	Primary Copper Smelters
	X	Subpart Q	Primary Zinc Smelters
	X	Subpart R	Primary Lead Smelters
	X	Subpart S	Primary Aluminum Reduction Plants
	X	Subpart T	Phosphate Fertilizer Industry; Wet-Process Phosphoric Acid Plants
	X	Subpart U	Phosphate Fertilizer Industry; Superphosphoric Acid Plants
	X	Subpart V	Phosphate Fertilizer Industry; Diammonium Phosphate Plants
	X	Subpart W	Phosphate Fertilizer Industry; Triple Superphosphate Plants
	X	Subpart X	Phosphate Fertilizer Industry; Granular Triple Superphosphate Storage Facilities
	X	Subpart Y	Coal Preparation Plants
	X	Subpart Z	Ferroalloy Production Facilities
	X	Subpart AA	Steel Plants Electric Arc Furnaces
	X	Subpart AAa	Steel Plants Electric Arc Furnaces and Argon-oxygen Decarburization
	X	Subpart BB	Kraft Pulp Mills
	X	Subpart CC	Glass Manufacturing Plants
	X	Subpart DD	Grain Elevators
	X	Subpart EE	Surface Coating of Metal Furniture
X		Subpart GG	Stationary Gas Turbines

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Applicability			
Yes	No		
_____	X	Subpart HH	Lime Manufacturing Plants
_____	X	Subpart KK	Lead-Acid Battery Manufacturing
_____	X	Subpart LL	Metallic Mineral Processing Plants
_____	X	Subpart MM	Automobile and Light-Duty Truck Surface Coating Operations
_____	X	Subpart NN	Phosphate Rock Plants
_____	X	Subpart PP	Ammonium Sulfate Manufacture
_____	X	Subpart QQ	Graphic Arts Industry; Publication Rotogravure Printing
_____	X	Subpart RR	Pressure Sensitive Tape and Label Surface Coating Operations
_____	X	Subpart SS	Industrial Surface Coating Large Appliances
_____	X	Subpart TT	Metal Coil Surface Coating
_____	X	Subpart UU	Asphalt Processing and Asphalt Roofing Manufacture
_____	X	Subpart VV	Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry
_____	X	Subpart WW	Beverage Can Surface Coating Industry
_____	X	Subpart XX	Bulk Gasoline Terminals
_____	X	Subpart AAA	New Residential Wood Heaters
_____	X	Subpart BBB	Rubber Tire Manufacturing Industry
_____	X	Subpart FFF	Flexible Vinyl and Urethane Coating and Printing
_____	X	Subpart GGG	Equipment Leaks of VOC In Petroleum Refineries
_____	X	Subpart HHH	Synthetic Fiber Production Facilities
_____	X	Subpart III	VOC Emissions from SOCMI Air Oxidation Unit Processes
_____	X	Subpart JJJ	Petroleum Dry Cleaners
_____	X	Subpart KKK	Equipment Leaks of VOC from Onshore Natural Gas Processing
_____	X	Subpart LLL	Onshore Natural Gas Processing-SO_2 Emissions
_____	X	Subpart NNN	VOC Emissions from SOCMI Distillation Operations
_____	X	Subpart OOO	Nonmetallic Mineral Processing Plants
_____	X	Subpart PPP	Wool Fiberglass Insulation Manufacturing Plants
_____	X	Subpart QQQ	VOC Emissions form Petroleum Refinery Wastewater Systems
_____	X	Subpart SSS	Magnetic Tape Coating Facilities
_____	X	Subpart TTT	Industrial Surface Coating of Plastic Parts for Business Machines
_____	X	Subpart UUU	Standards of Performance for Calciners and Dryers in Mineral Industries
_____	X	Subpart VVV	Polymeric Coating of Supporting Substrates Facilities
		Maximum Achievable Control Technology Regulations - 10 CSR 10-6.075 *(40 CFR Part 63 National Emission Standards for Hazardous Air Pollutants for Source Categories)*	
_____	X	Subpart F	National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical manufacturing Industry

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Applicability			
Yes	No		
____	X	Subpart G	National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater
____	X	Subpart H	National Emission Standards for Organic Hazardous Air Pollutants for Equipment Leaks
____	X	Subpart I	National Emission Standards for Organic Hazardous Air Pollutants for Certain Process Subject to the Negotiated Regulation for Equipment Leaks
____	X		
____	X	Subpart L	National Emission Standards for Coke Oven Batteries
____	X	Subpart M	National Perchloroethylene Air Emission Standards for Dry Cleaning
____	X	Subpart N	National Emission Standards for Chromium Emissions from Hard and Decorative Chromium Electroplating and From Chromium Anodizing Tanks
____	X	Subpart O	Ethylene Oxide Emission Standards for Sterilization Facilities
____	X	Subpart Q	National Emission Standards for Hazardous Air Pollutants for Industrial Process Cooling Towers
____	X	Subpart R	National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations)
____	X	Subpart T	National Emission Standards for Halogenated Solvent Cleaning
____	X	Subpart W	National Emission Standards for Hazardous Air Pollutants for Epoxy Resins Production and Non-Nylon Polyamide Production
____	X	Subpart X	National Emission Standards for Hazardous Air Pollutants from Secondary Lead Smelting
____	X	Subpart Y	Federal Standards for Marine Tank Vessel Loading and National Emission Standards for Hazardous Air Pollutants for Marine Tank Vessel Loading Operations
____	X	Subpart CC	National Emission Standards for Hazardous Air Pollutants; Petroleum Refineries
____	X	Subpart EE	National Emission Standards for magnetic Tape Manufacturing Operations
____	X	Subpart GG	National Emission Standards for Hazardous Air Pollutants for Source Categories: Aerospace Manufacturing and Rework Facilities
____	X	Subpart II	National Emission Standards for Hazardous Air Pollutants for Shipbuilding & Ship Repair (Surface Coating) Operations
____	X	Subpart JJ	National Emission Standards for Hazardous Air Pollutants; Final Standards for Hazardous Air Pollutant Emissions from Wood Furniture Manufacturing Operations

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Emission Standards for Hazardous Air Pollutants - 10 CSR 10-6.080
(40 CFR Part 61 National Emission Standards for Hazardous Air Pollutants)

Applicability Yes	Applicability No		
	X	Subpart B	National Emission Standards for Radon Emissions from Underground Uranium Mines
	X	Subpart C	National Emission Standard for Beryllium
	X	Subpart D	National Emission Standard for Beryllium Rocket Motor Firing
	X	Subpart E	National Emission Standard for Mercury
	X	Subpart F	National Emission Standard for Vinyl Chloride
	X	Subpart H	National Emission Standards for Emissions of Radionuclides Other Than Radon From Department of Energy Facilities
	X	Subpart I	National Emission Standards for Radionuclides Emissions from Facilities Licensed by the Nuclear Regulatory Commission and Federal Facilities Not Covered by Subpart H
	X	Subpart J	National Emission Standard for Equipment Leaks (Fugitive Emission Sources) of Benzene
	X	Subpart K	National Emission Standards for Radionuclide Emissions from Elemental Phosphorous Plants
	X	Subpart L	National Emission Standard for Benzene Emissions from Coke By-Products Recovery Plants
	X	Subpart M	National Emission Standard for Asbestos
	X	Subpart N	National Emission Standard for Inorganic Arsenic Emissions from Glass Manufacturing Plants
	X	Subpart O	National Emission Standard for Inorganic Arsenic Emissions from Primary Copper Smelters
	X	Subpart P	National Emission Standard for Inorganic Arsenic Emissions from Arsenic Trioxide and metallic Arsenic Production Facilities
	X	Subpart Q	National Emission Standards for Radon Emissions from Department of Energy Facilities
	X	Subpart R	National Emission Standards for Radon Emissions From Phosphogypsum Stacks
	X	Subpart T	National Emission Standards for Radon Emissions from the Disposal of Uranium Mill Tailings
	X	Subpart V	National Emission Standards for Equipment Leaks (Fugitive Emission Sources)
	X	Subpart W	National Emission Standards for Radon Emissions From Operating Mill Tailings
	X	Subpart Y	National Emission Standards for Benzene Emissions from Benzene Storage Vessels
	X	Subpart BB	National Emission Standard for Benzene Emissions from Benzene Transfer Operations
	X	Subpart FF	National Emission Standard for Benzene Waste Operations

FORM OP - D01 EXISTING PLANT-WIDE PERMIT CONDITIONS Section D

Facility Name	County No.	Plant No.	Year Submitted
Peculiar Compressor Station	0840	0048	2001

Please list in the space provided below any permit conditions which are currently applicable on a plant-wide basis: (i.e. Production is limited to 10,000 units per 12 month rolling average, or a limit on the facility's hours of operation)

Permit No.	Applicable Permit Condition
072000-009	NOx emissions from the 2 compressor engines (E1-E2) and the turbine (E4) are limited to 98 tpy and 22.4 lb/hr (total).
037-0048-001	There are no applicable specific conditions in this permit. There are applicable regulatory requirements that are summarized on Forms OP-A03 and OP-D04.

Permit No.	Compliance Demonstration Method	Describe Method and Give Reference
072000-009	Initial Testing	The construction permit requires initial testing (NOx, CO, VOC) of the 2 compressor engines and the turbine using EPA reference methods.
072000-009	Recordkeeping	The 2 compressor engines have operating limitations under certain conditions. Records of engine/turbine operating performance will be used to determine compliance with the operating limitations.
072000-009	Routine Engine Monitoring	Semi-annual NOx monitoring must be conducted for any unit operating more than 240 hours during the previous six month period.

FORM OP - D02 PROPOSED PLANT-WIDE PERMIT CONDITIONS Section D

Facility Name	County No.	Plant No.	Year Submitted
Peculiar Compressor Station	0840	0048	2001

Please list in the space provided below any proposed permit conditions which you wish to establish in this operating permit: (i.e. Production is limited to 10,000 units per 12 month rolling average, or a limit on the facility's hours of operation)

Proposed Condition	
	WGPC proposes that all of the limits and compliance determination methods from the most
	recent construction permit (Permit No. 072000-009) be included in the operating permit.
	These existing conditions are summarized on Form OP-D01. No new conditions are
	proposed with this application.

Please describe what methodologies you intend to use to demonstrate compliance with each of the proposed plant-wide condition(s) that are being established above: (i.e. testing, monitoring, recordkeeping, etc.)

Proposed Condition Number	Compliance Demonstration Method	Describe Method and Give Reference

Facility Name	County No.	Plant No.	Year Submitted
Peculiar Compressor Station	0840	0048	2001

Emission Point No.	Emission Unit No.	Source Classification Code (SCC)
E01	E01	20200252

1. Emission Unit(s) Information

Description of Unit(s)	Manufacturer, Model No., Date of Manufacture	Stack IDs	Maximum Design Rate/Capacity
Natural Gas-Fired Reciprocating Engine	Cooper-Bessemer GMVH-10C2	S01	2,000 bhp (Rated)
	(Modified 5/01)		

Will this unit be operated under an alternate operating sceanrio?
Yes: X No: _____ If yes, you must complete a separate Section D.2 on FORM OP-D03 for each scenario

Total Maximum Design Rate/Capacity

2. Alternate Operating Scenario (Flexibility)

Alternate Sceanrio ID:	SIC Code Associated with Scenario:
Mode 1	4922

Description: Only one reciprocating enigne operating with or without the turbine. There are no operating limitations when operating in this mode.

Alternate Sceanrio ID:	SIC Code Associated with Scenario:
Mode 2	4922

Description: Both reciprocating enignes are operating together without the turbine. In this mode, there are no operating limitations as long as the engine is operating above 285 revolutions per minute (rpm). If the engine operates below 285 rpm then its engine loading is limited to 98% torque. This limitation is included in the construction permit for this station.

Alternate Sceanrio ID:	SIC Code Associated with Scenario:
Mode 3	4922

Description: Both reciprocating enignes and the turbine are all operating together. This reciprocating engine is required to operate within a specific operating envelope that is defined in the construction permit. The operating envelope is defined by the engine speed (in rpm) and load (in % torque).

Use FORM OP-F01 or the back of this page if additional space is needed for multiple Alternative Operating Scenarios.

3. Voluntary Permit Conditions *for reducing potential emissions, conditions will become federally enforceable.*

Condition(s) Requested	Description	Limitation	Pollutant Controlled
WGPC is requesting that all of the operating limitations contained in the most recent construction permit (Permit No. 072000-009) be included in this operating permit. There are no new permit conditions being proposed in this application.			

Facility Name	County No.	Plant No.	Year Submitted
Peculiar Compressor Station	0840	0048	2001

Emission Point No.	Emission Unit No.	Source Classification Code (SCC)
E02	E02	20200252

1. Emission Unit(s) Information

Description of Unit(s)	Manufacturer, Model No., Date of Manufacture	Stack IDs	Maximum Design Rate/Capacity
Natural Gas-Fired Reciprocating Engine	Cooper-Bessemer GMVH-10C2	S02	2,000 bhp (Rated)
	(Modified 5/01)		

Will this unit be operated under an alternate operating sceanrio?
Yes: X No: _____ If yes, you must complete a separate Section D.2 on FORM OP-D03 for each scenario

Total Maximum Design Rate/Capacity

2. Alternate Operating Scenario (Flexibility)

Alternate Sceanrio ID:	SIC Code Associated with Scenario:
Mode 1	4922

Description: Only one reciprocating enigne operating with or without the turbine. There are no operating limitations when operating in this mode.

Alternate Sceanrio ID:	SIC Code Associated with Scenario:
Mode 2	4922

Description: Both reciprocating enignes are operating together without the turbine. In this mode, there are no operating limitations as long as the engine is operating above 285 revolutions per minute (rpm). If the engine operates below 285 rpm then its engine loading is limited to 98% torque. This limitation is included in the construction permit for this station.

Alternate Sceanrio ID:	SIC Code Associated with Scenario:
Mode 3	4922

Description: Both reciprocating enignes and the turbine are all operating together. This reciprocating engine is required to operate within a specific operating envelope that is defined in the construction permit. The operating envelope is defined by the engine speed (in rpm) and load (in % torque).

Use FORM OP-F01 or the back of this page if additional space is needed for multiple Alternative Operating Scenarios.

3. Voluntary Permit Conditions *for reducing potential emissions, conditions will become federally enforceable*

Condition(s) Requested	Description	Limitation	Pollutant Controlled
WGPC is requesting that all of the operating limitations contained in the most recent construction permit (Permit No. 072000-009) be included in this operating permit. There are no new permit conditions being proposed in this application.			

FORM OP - D03 EMISSION UNIT INFORMATION Section D

Facility Name	County No.	Plant No.	Year Submitted
Peculiar Compressor Station	0840	0048	2001

Emission Point No.	Emission Unit No.	Source Classification Code (SCC)
E03	E03	20200201

1. Emission Unit(s) Information

Description of Unit(s)	Manufacturer, Model No., Date of Manufacture	Stack IDs	Maximum Design Rate/Capacity
Natural Gas-Fired Emergency Generator	Waukesha 195GKU	S03	112 bhp

Will this unit be operated under an alternate operating sceanrio?
Yes: _____ No: ___X___ If yes, you must complete a separate Section D.2 on FORM OP-D03 for each scenario

Total Maximum Design Rate/Capacity

2. Alternate Operating Scenario (Flexibility) N/A

Alternate Sceanrio ID:	SIC Code Associated with Scenario:

Description: None proposed for this unit.

Use FORM OP-F01 or the back of this page if additional space is needed for multiple Alternative Operating Scenarios.

3. Voluntary Permit Conditions: *for reducing potential emissions; conditions will become federally enforceable* No

Condition(s) Requested	Description	Limitation	Pollutant Controlled

Facility Name	County No.	Plant No.	Year Submitted
Peculiar Compressor Station	0840	0048	2001

Emission Point No.	Emission Unit No.	Source Classification Code (SCC)
E04	E04	20200201

1. Emission Unit(s) Information

Description of Unit(s)	Manufacturer, Model No., Date of Manufacture	Stack IDs	Maximum Design Rate/Capacity
Natural Gas-Fired Turbine	Solar Saturn 20-T1600	S04	1,535 bhp
	(Installed 5/01)		(Rated at ISO Conditions)

Will this unit be operated under an alternate operating sceanrio?
Yes: _____ No: __X__ If yes, you must complete a separate Section D.2 on FORM OP-D03 for each scenario

Total Maximum Design Rate/Capacity

2. Alternate Operating Scenario (Flexibility)

Alternate Sceanrio ID:	SIC Code Associated with Scenario:

Description: None proposed for this unit. It can operate without limitations under all of the scenarios for the reciprocating engines.

Use FORM OP-F01 or the back of this page if additional space is needed for multiple Alternative Operating Scenarios.

3. Voluntary Permit Conditions *for reducing potential emissions, conditions will become federally enforceable*

Condition(s) Requested	Description	Limitation	Pollutant Controlled
WGPC is requesting that all of the operating limitations contained in the most recent construction permit (Permit No. 072000-009) be included in this operating permit. There are no new permit conditions being proposed in this application.			

FORM OP - D04 APPLICABLE REQUIREMENTS

Section D

Facility Name	County No.	Plant No.	Year Submitted
Peculiar Compressor Station	0840	0048	2001

4. Applicable Requirements (federal, state and local regulations plus any federally enforceable permit conditions)

Emission Point/Unit	Pollutant	Applicable Requirement Authority (CSR#, CFR#, Permit No., etc)	Emission Limit or Standard and Units	Compliance Determination Method (Testing, Monitoring, etc.)
Facility	Several	10 CSR 10-2.070	Odorous emissions not allowed	DNR Inspections
Facility	Several	10 CSR 10-2.080	None - refers to a rescinded regulation	Not Applicable
Facility	Several	10 CSR 10-2.100	Open burning generally prohibited	DNR Inspections
Facility	Several	10 CSR 10-6.050	Report excess emissions	DNR Inspections
Facility	Several	10 CSR 10-6.065	Operating permit required	DNR Inspections
Facility	Several	10 CSR 10-6.110	Submit annual EIQ's	DNR Inspections
Facility	Several	10 CSR 10-6.130	Reduce emissions (if possible) during alerts	DNR Inspections
Facility	Several	10 CSR 10-6.150	Circumvention prohibited	DNR Inspections
Facility	Several	10 CSR 10-6.170	No visible PM emissions beyond plant boundary	DNR Inspections
Facility	Several	10 CSR 10-6.180	Conduct emission tests if requested by DNR	DNR Inspections
Facility	CFC's	40 CFR 82	Use certified personnel and equipment if required	DNR Inspections
E04	NO_x	40 CFR 60.332(a)(2)[Subpart GG]	NO_x limited to 150 ppmvd (corrected to 15 % O_2)	Testing
E04	SO_2	40 CFR 60.333(b)[Subpart GG]	Fuel sulfur content limited to 0.8 wt%	Recordkeeping
E01, E02, E04	NO_x	Permit No. 072000-009	NO_x limited to 98 tpy and 22.4 lb/hr (total)	Testing/Recordkeeping/Monitoring

Use FORM OP - D05 for any specific Compliance Determeination Method applicable to the Emission Unit. You must attach a completed FORM OP - E01, "Compliance Plan/Status" if the Emission Unit is currently failing to meet any Applicable Requirements, FORM OP - E01 delineates what provisions are not being met and what steps will be taken to bring the Unit back into compliance.

FORM OP - D05 COMPLIANCE DETERMINATION METHODS Section D

Facility Name	County No.	Plant No.	Year Submitted
Peculiar Compressor Station	0840	0048	2001

Emission Point E01	Emission Unit No. E01	Applicable Requirement: Construction Permit 072000-009 (NO_x Limit)

5. Compliance Demonstration Methods (Testing, Monitoring, Recordkeeping, Reporting, etc.)

Check the Applicable Method	Basis of Compliance Method
X Testing	X Monitoring	X Applicable Requirements
X Recordkeeping	Reporting	Gap Filling

Testing

List parameters for which records are being maintained, the frequency of such records (hourly, daily, etc.) and the length of time records are retained from the date of entry. For each recorded parameter include the method of measurement.

Date	Test Method	Firm	Operating Conditions	Summary of Results
Not Yet Performed	EPA Methods 3a, 7e & 19		Varying conditions to the extent possible	This testing has not yet been performed. It is planned for July 2001.

Recordkeeping

List parameters for which records are being maintained, the frequency of such records (hourly, daily, etc.) and the length of time records are retained from the date of entry. For each recorded parameter include the method of measurement.

Parameter (data) Being Recorded	Measurement Method	Frequency	Record Retention
Engine speed (in rpm) and load (in % torque)	Engine control system	Hourly	5 Years

Monitoring

Describe any emission monitoring used, location of monitor, pollutants being monitored, sampling frequency and duration, and data reporting.

Monitoring Device Type	Location Description	Pollutant(s) Being Monitored
Portable Analyzer	Sample stack gas through sampling ports	NOx

Sampling Frequency	Duration of Sampling	How Data Will Be Reported
Semi-annual	1 Hour	Retain test results in the file and available during inspections

Reporting

Describe all reporting requirements and provide the title and frequency of report submittals to the agency.

Reporting Requirement	Title of Report	Submittal Frequency

Attach description for any Alternative Compliance Demonstration Methods not listed above and label as EXHIBIT FORM OP-D05

FORM OP - D05 COMPLIANCE DETERMINATION METHODS Section D

Facility Name	County No.	Plant No.	Year Submitted
Peculiar Compressor Station	0840	0048	2001

Emission Point E02	Emission Unit No. E02	Applicable Requirement: Construction Permit 072000-009 (NO_x Limit)

5. Compliance Demonstration Methods (Testing, Monitoring, Recordkeeping, Reporting, etc.)

Check the Applicable Method	Basis of Compliance Method
X Testing	X Monitoring	X Applicable Requirements
X Recordkeeping	Reporting	Gap Filling

Testing

List parameters for which records are being maintained, the frequency of such records (hourly, daily, etc.) and the length of time records are retained from the date of entry. For each recorded parameter include the method of measurement.

Date	Test Method	Firm	Operating Conditions	Summary of Results
Not Yet Performed	EPA Methods 3a, 7e & 19		Varying conditions to the extent possible	This testing has not yet been performed. It is planned for July 2001.

Recordkeeping

List parameters for which records are being maintained, the frequency of such records (hourly, daily, etc.) and the length of time records are retained from the date of entry. For each recorded parameter include the method of measurement.

Parameter (data) Being Recorded	Measurement Method	Frequency	Record Retention
Engine speed (in rpm) and load (in % torque)	Engine control system	Hourly	5 Years

Monitoring

Describe any emission monitoring used, location of monitor, pollutants being monitored, sampling frequency and duration, and data reporting.

Monitoring Device Type	Location Description	Pollutant(s) Being Monitored
Portable Analyzer	Sample stack gas through sampling ports	NOx

Sampling Frequency	Duration of Sampling	How Data Will Be Reported
Semi-annual	1 Hour	Retain test results in the file and available during inspections

Reporting

Describe all reporting requirements and provide the title and frequency of report submittals to the agency.

Reporting Requirement	Title of Report	Submittal Frequency

Attach description for any Alternative Compliance Demonstration Methods not listed above and label as EXHIBIT FORM OP-D05

FORM OP - D05 COMPLIANCE DETERMINATION METHODS Section D

Facility Name	County No.	Plant No.	Year Submitted
Peculiar Compressor Station	0840	0048	2001

Emission Point E04	Emission Unit No. E04	Applicable Requirement: 40 CFR 60.332(a)(2) [NSPS NOx Limit]

5. Compliance Demonstration Methods (Testing, Monitoring, Recordkeeping, Reporting, etc.)

Check the Applicable Method	Basis of Compliance Method
X Testing X Monitoring	X Applicable Requirements
_____ Recordkeeping _____ Reporting	_____ Gap Filling

Testing

List parameters for which records are being maintained, the frequency of such records (hourly, daily, etc.) and the length of time records are retained from the date of entry. For each recorded parameter include the method of measurement.

Date	Test Method	Firm	Operating Conditions	Summary of Results
Not Yet Performed	EPA Method 20		Rated Capacity	This testing has not yet been performed. It is planned for July 2001.

Recordkeeping

List parameters for which records are being maintained, the frequency of such records (hourly, daily, etc.) and the length of time records are retained from the date of entry. For each recorded parameter include the method of measurement.

Parameter (data) Being Recorded	Measurement Method	Frequency	Record Retention

Monitoring

Describe any emission monitoring used, location of monitor, pollutants being monitored, sampling frequency and duration, and data reporting.

Monitoring Device Type	Location Description	Pollutant(s) Being Monitored
Portable Analyzer	Sample stack gas through sampling ports	NOx

Sampling Frequency	Duration of Sampling	How Data Will Be Reported
Semi-annual	1 Hour	Retain test results in the file and available during inspections

Reporting

Describe all reporting requirements and provide the title and frequency of report submittals to the agency.

Reporting Requirement	Title of Report	Submittal Frequency

Attach description for any Alternative Compliance Demonstration Methods not listed above and label as EXHIBIT FORM OP-D05

FORM OP - D05 COMPLIANCE DETERMINATION METHODS Section D

Facility Name	County No.	Plant No.	Year Submitted
Peculiar Compressor Station	0840	0048	2001

Emission Point E04	Emission Unit No. E04	Applicable Requirement: 40 CFR 60.333(b) [NSPS SO_2 Limit]

5. Compliance Demonstration Methods (Testing, Monitoring, Recordkeeping, Reporting, etc.)

Check the Applicable Method	Basis of Compliance Method
_____ Testing _____ Monitoring	____X____ Applicable Requirements
___X___ Recordkeeping _____ Reporting	_____ Gap Filling

Testing

List parameters for which records are being maintained, the frequency of such records (hourly, daily, etc.) and the length of time records are retained from the date of entry. For each recorded parameter include the method of measurement.

Date	Test Method	Firm	Operating Conditions	Summary of Results

Recordkeeping

List parameters for which records are being maintained, the frequency of such records (hourly, daily, etc.) and the length of time records are retained from the date of entry. For each recorded parameter include the method of measurement.

Parameter (data) Being Recorded	Measurement Method	Frequency	Record Retention
Fuel Sulfur Content	ASTM D-3246	Currently bi-weekly, will change per CFMS	5 Years

Monitoring

Describe any emission monitoring used, location of monitor, pollutants being monitored, sampling frequency and duration, and data reporting.

Monitoring Device Type	Location Description	Pollutant(s) Being Monitored

Sampling Frequency	Duration of Sampling	How Data Will Be Reported

Reporting

Describe all reporting requirements and provide the title and frequency of report submittals to the agency.

Reporting Requirement	Title of Report	Submittal Frequency

Attach description for any Alternative Compliance Demonstration Methods not listed above and label as EXHIBIT FORM OP-D05

Facility Name	County No.	Plant No.	Year Submitted
Peculiar Compressor Station	0840	0048	2001

Completion of this form of the operating permit forms package is mandatory for all sources. Complete this form once for each application.

1. Compliance status with all applicable requirements effective at the time of the issuance of this permit.

Will your facility be in compliance with all applicable requirements at the time of the permit issuance and continue to comply with these requirements for the duration of this permit?

Yes: X No _____ (If No, Complete the table I)

Schedule for Achieving Compliance Table I

Applicable Requirement for Which Compliance	How Will Compliance Be Achieved With This Applicable	Detailed Schedule Of Compliance	Frequency for Submittal of Progress Reports	Starting Date for Submittal of Progress
		/ /		
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		/ /		

2. Future Effective Compliance Requirements.

Will your facility be in compliance with all applicable requirements taking effect during the term of the permit and meet such requirements on a timely basis?

Yes: X No _____ (If No, Complete the table II)

Schedule for Achieving Compliance Table II

Applicable Requirement That You Expect Will NOT be Complied With	Detailed Schedule To Compliance (See Instructions) Step	Date
		/ /
		/ /
		/ /
		/ /
		/ /
		/ /

FORM OP - E02 COMPLIANCE CERTIFICATION STATEMENT Section E

Facility Name	County No.	Plant No.	Year Submitted
Peculiar Compressor Station	0840	0048	2001

Complete this form once per application with respect to all applicable requirements at the source. (See Instructions)

1. Schedule for submission of compliance certification during the permit term

Frequency of Submittals	Beginning Date
Annual	4/1/02

2. Statement of compliance with enhanced monitoring and compliance certification

Is the Air Contaminant Source Identified In This Application In Compliance With All Applicable Enhanced Monitoring and Compliance Certification Requirements?

Yes: X No: _____ (If No, Describe Which Requirements Are NOT Being Met)

Description of Requirement Not Being Met

3. Certification of compliance with all applicable requirements

This certification must be signed by a responsible official (See Instructions). Applications without a signed certification of compliance will be returned as incomplete.

Except for requirements identified in the above statement for which compliance is not achieved, I hereby certify that, based on information and belief formed after reasonable inquiry, the air contaminant source identified in this application is in compliance with all applicable requirements

Signature: _____ Date: 6/7/2001

Name (Typed or printed): Robert S. Bahnick

FORM OP – F01 GENERAL COMMENTS

Section F

Facility Name	County No.	Plant No.	Year Submitted
Peculiar Compressor Station	0840	0048	2001

There are several regulations in Chapter 2 that have been repealed since the Form OP-A03 was issued. These regulations are listed as not applicable with a code of "K" in the forms. Specifically, the regulations that appear to have been repealed are: 10 CSR 10-2.050, .060, .090, .160, and .200.

40 CFR 68 does not apply to this facility because it is not defined as a stationary source pursuant to the definition included in the rule. The station is regulated by the U.S. Department of Transportation (DOT) under 49 CFR 192. As such, it is not defined as a stationary source. Attachment 2 provides selected text from the rule and preamble demonstrating that natural gas compressor stations are not covered by 40 CFR 68.

This station is covered by a custom fuel monitoring schedule approved by the Missouri Department of Natural Resources (DNR). A copy of the CFMS approval is included as Attachment 3. The station is currently following the CFMS; therefore, it is in compliance with the NSPS for Stationary Gas Turbines (Subpart GG).

Williams Gas Pipelines Central (WGPC) is not proposing any facility modifications with this application but rather is simply requesting an operating permit for a recently modified facility. All of the modifications outlined in the most recent construction permit have been completed as planned. Please refer to the cover letter for further details.

WGPC is requesting that all of the terms and conditions from Construction Permit No. 072000-009 be incorporated into the operating permit for this station and that the Intermediate Operating Permit replace the Part 70 operating permit currently held by the station.

State of Missouri
Application for Authority to Operate
Completeness Checklist

FORM OP - F02 COMPLETENESS CHECKLIST Section F

Facility Name	County No.	Plant No.	Year Submitted
Peculiar Compressor Station	0840	0048	2001

Put a check mark - √ - on the Checklist Line Number after completion of each item and section.

SECTION A - GENERAL APPLICATION INFORMATION

Part 1 - Facility Information	Agency Use Only	Information required for an administratively complete application
____ Line 1:	Y: ___ N: ___	Facility Name, County Number, Plant Number, Year Submitted
____ Line 2:	Y: ___ N: ___	Facility Street Address, County Name
____ Line 3:	Y: ___ N: ___	City, State, Zip Code & Facility Phone Number
____ Line 4:	Y: ___ N: ___	Facility Mailing Address & Fax Number
____ Line 5:	Y: ___ N: ___	Facility Mailing Address & Fax Number
____ Line 6:	Y: ___ N: ___	City, State, Zip Code & Missouri Senatorial District
____ Line 7:	Y: ___ N: ___	Contact Person Name & Missouri Representative District
____ Line 7:	Y: ___ N: ___	Contact Person Title & Section, Township & Range Information
Completed X	Y: ___ N: ___	
Part 2 - Parent Company Information		
____ Line 8:	Y: ___ N: ___	Parent Company Name, Contact Person Name & Phone Number
____ Line 9:	Y: ___ N: ___	Parent Company Name, Contact Person Name & Phone Number
Completed X	Y: ___ N: ___	
Part 3 & 4 - Type of Application		
____ Line 10:	Y: ___ N: ___	Checked one type only
____ Line 11:	Y: ___ N: ___	Checked one type only
Completed X	Y: ___ N: ___	
Part 5 - Applicant's Certification Statement		
____ Line 12:	Y: ___ N: ___	Signature of Responsible Company Official & Dated
____ Line 13:	Y: ___ N: ___	Type or Print Signer's Name
____ Line 14:	Y: ___ N: ___	Official Title of Signer & Signer's Telephone Number
Completed X	Y: ___ N: ___	
Part 6 & 7 - Product & Process Information and 2 digit SIC		
____ Line 15:	Y: ___ N: ___	Principle Product, and its 2 digit SIC Code.
____ Line 16:	Y: ___ N: ___	Process Type(s), and their 2 digit SIC Code(s).
Completed X	Y: ___ N: ___	
Part 8 - Alternative Operating		
____ Line 17:	Y: ___ N: ___	Principle Product, and its 2 digit SIC Code.
Completed X	Y: ___ N: ___	Answered Yes or No, Checked Appropriate Space.

FORM OP - F02 COMPLETENESS CHECKLIST - CONTINUED

SECTION A - GENERAL APPLICATION INFORMATION		
Part 9 - EIQ Submittal	Agency Use Only	
____ Line 18:	Y: ___ N: ___	Answered Yes or No. If Yes, indicated date of most recent EIQ.
____ Line 19:	Y: ___ N: ___ NA: ___	If No, Submitted the block checklist indicating the type and number of EIQ forms sent with application.
Completed X	Y: ___ N: ___	
Part 10 - Number and type of Forms Used For Each Product		
____ Line 20:	Y: ___ N: ___	Submitted the block checklist indicating the type and number forms completed in this application for each major product type.
Completed X	Y: ___ N: ___	
Part 11 - Applicable Requirements		
____ Line 21:	Y: ___ N: ___	Submitted a list of Applicable Requirements that apply to this facility
Completed X	Y: ___ N: ___	

SECTION B - EMISSIONS INVENTORY *Complete this section if you are required to submit two copies of EIQ with this application.*		
Part 1 - EIQ (Emissions Inventory Questionnaire)		
____ Line 22:	Y: ___ N: ___	Submitted most recent EIQ with this Application.
____ Line 23:	Y: ___ N: ___ NA: ___	Quantification of all emissions in tons per year.
____ Line 24:	Y: ___ N: ___ NA: ___	Emission Points identified and descriptions detailed.
Completed NA	Y: ___ N: ___	

SECTION C - INSIGNIFICANT ACTIVITIES		
Part 1 - Activities *Not Required*		
____ Line 25:	Y: ___ N: ___	Facility Name, County Number, Plant Number, Year Submitted
____ Line 26:	Y: ___ N: ___ NA: ___	Submitted a completed checklist..
Completed NA	Y: ___ N: ___	
Part 2 - Activities Required to		
____ Line 27:	Y: ___ N: ___	Facility Name, County Number, Plant Number, Year Submitted
____ Line 28:	Y: ___ N: ___ NA: ___	Submitted a completed block checklist..
Completed NA	Y: ___ N: ___	
Part 3 - List of Insignificant		
____ Line 29:	Y: ___ N: ___	Facility Name, County Number, Plant Number, Year Submitted
____ Line 30:	Y: ___ N: ___ NA: ___	Emission Unit #, Number of Activities (Grouped), Pollutant(s) Emitted, Estimated Emissions (Tons/Yr)
____ Line 31:	Y: ___ N: ___ NA: ___	Description of Activity
Completed NA	Y: ___ N: ___	

FORM OP - F02 COMPLETENESS CHECKLIST - CONTINUED

SECTION D: EMISSION UNIT INFORMATION

	Agency Use Only	
Part 1 - Existing Plant -Wide Permit Conditions		
____ Line 32:	Y: ___ N: ___	Facility Name, County Number, Plant Number, Year Submitted.
____ Line 33:	Y: ___ N: ___ NA: ___	Permit No. and Applicable Permit Conditions are Listed.
____ Line 34:	Y: ___ N: ___ NA: ___	Compliance Demonstration Method and Description of Methods of Compliance is Provided.
Completed ___X___	Y: ___ N: ___	
Part 2 - Proposed Plant -Wide Permit Conditions		
____ Line 35:	Y: ___ N: ___	Facility Name, County Number, Plant Number, Year Submitted.
____ Line 36:	Y: ___ N: ___ NA: ___	Any Proposed Plant-Wide Permit Conditions are Listed.
____ Line 37:	Y: ___ N: ___ NA: ___	Compliance Demonstration Method and Description of Methods of Compliance is Provided..
Completed ___X___	Y: ___ N: ___	
Part 3 - Emission Unit Information		
____ Line 38:	Y: ___ N: ___	Facility Name, County Number, Plant Number, Year Submitted.
____ Line 39:	Y: ___ N: ___	Emission Point No., Emission Unit No., Source Classification Code.
____ Line 40:	Y: ___ N: ___	Description of Unit, Manufacturer & Model NO., Date of Manufacture, Stack ID, Maximum Design Rate/Capacity
____ Line 41:	Y: ___ N: ___	Alternate Operating Scenario?, Total Maximum Design Rate/Capacity
Completed ___X___	Y: ___ N: ___	
Part 4 - Alternate Operating		
____ Line 42:	Y: ___ N: ___ NA: ___	Alternate Operating Scenario ID, SIC Code for Scenario.
____ Line 43:	Y: ___ N: ___ NA: ___	Description of Alternate Operating Scenario.
____ Line 44:	Y: ___ N: ___ NA: ___	Operational Flexibility ensure emissions trades among Emission Units in the facility made w/o permit revision are QUANTIFIABLE & ENFORCEABLE under 70.4(b)(12)
____ Line 45:	Y: ___ N: ___ NA: ___	Alternative Scenarios Identified & DO NOT REQUIRE Permit Revisions for: (Circle Appropriate Items) A) Facility Emissions Information B) Control Device Requirements C) Any Applicable Requirements D) Monitoring, Recordkeeping & Reporting Requirements E) Compliance Certification Requirements
Completed ___X___	Y: ___ N: ___	

FORM OP - F02 COMPLETENESS CHECKLIST - CONTINUED

SECTION D - EMISSION UNIT INFORMATION

	Agency Use Only	
Part 5 - Voluntary Permit Conditions		
____ Line 46:	Y: ____ N: ____ NA: ____	Conditions Requested, Description, Limitation, Pollutant Controlled.
Completed X	Y: ____ N: ____	
Part 6 - Applicable Requirements		
____ Line 47:	Y: ____ N: ____	Facility Name, County Number, Plant Number, Year Submitted
____ Line 48:	Y: ____ N: ____	Emission Point No., Emission Unit No. Pollutant, Applicable Requirement Authority, Emission Limit or Standard, Unit of Emission Limit or Standard, Compliance Determination Method.
Completed X	Y: ____ N: ____	
Part 7 - Compliance Determination Methods		
____ Line 49:	Y: ____ N: ____	Facility Name, County Number, Plant Number, Year Submitted
____ Line 50:	Y: ____ N: ____	Emission Point No., Emission Unit No. Applicable Requirement.
____ Line 51:	Y: ____ N: ____	Applicable Method and Basis of Compliance Method checked
____ Line 52:	Y: ____ N: ____	Test Method - Date, Test Method, Firm, Operating Conditions, Summary of Results.
____ Line 53:	Y: ____ N: ____	Recordkeeping - Parameter (Data) Being Recorded, Measurement Method, Frequency, Record Retention Period.
____ Line 54:	Y: ____ N: ____	Monitoring - Device Type, Location Description, Pollutant(s) Being Monitored.
____ Line 55:	Y: ____ N: ____	Monitoring - Sampling Frequency, Duration of sampling, How Data Will be Reported.
____ Line 56:	Y: ____ N: ____	Reporting - Reporting Requirement, Title of Report, Submittal Frequency.
Completed X	Y: ____ N: ____	

SECTION E - COMPLIANCE CERTIFICATION

Part 1 - Compliance Plan/Status		
____ Line 57:	Y: ____ N: ____	Facility Name, County Number, Plant Number, Year Submitted.
____ Line 58:	Y: ____ N: ____	Will facility be in compliance at time of permit issuance?
Completed X	Y: ____ N: ____	

SECTION E - COMPLIANCE CERTIFICATION

If not in compliance at time of permit issuance complete the following:	Agency Use Only	
____ Line 59:	Y: ___ N: ___	Named applicable requirement for which compliance is not achieved.
____ Line 60:	Y: ___ N: ___	Described how compliance will be achieved with applicable requirement.
____ Line 61:	Y: ___ N: ___	Give detailed schedule of compliance.
____ Line 62:	Y: ___ N: ___	Frequency for submittal of progress reports.
____ Line 63:	Y: ___ N: ___	Start date of submittal of progress reports
Completed NA	Y: ___ N: ___	
Part 2 - Compliance Plan/Status		
____ Line 64:	Y: ___ N: ___	Will facility be in compliance with all applicable requirements taking effect during the term of the permit & meeting such requirements on a timely basis.
Completed X	Y: ___ N: ___	
If not in compliance for future requirements complete the following:		
____ Line 65:	Y: ___ N: ___ NA: ___	List of applicable requirements which will not be complied with during the term of the permit by the facility.
____ Line 66:	Y: ___ N: ___ NA: ___	Give detailed schedule leading to compliance..
Completed NA	Y: ___ N: ___	
Part 3 - Compliance		
____ Line 67:	Y: ___ N: ___	Frequency of Submittal schedule complete for permit and beginning date.
Completed X	Y: ___ N: ___	
Part 4 - Statement of Compliance with Enhanced Monitoring & Certification		
____ Line 68:	Y: ___ N: ___	Statement of Compliance Answered Yes or No
____ Line 69:	Y: ___ N: ___	If answer no then description given of requirements which are not being met
Completed X	Y: ___ N: ___	
Part 5 - Certification of Compliance with All Applicable Requirements		
____ Line 70:	Y: ___ N: ___	Certification of Compliance statement signed and dated by Responsible Official.
____ Line 71:	Y: ___ N: ___	Typed or Printed Name on Statement.
Completed X	Y: ___ N: ___	

Official Use Only — Reviewer's Signature — Date

Attachment 2

Definition of Stationary Source from 40 CFR 68.3

List of Regulated Substances and Thresholds for Accidental

[Federal Register: April 15, 1996 (Volume 61, Number 73)] [Proposed Rules]
[Page 16597-16604]
>From the Federal Register Online via GPO Access [wais.access.gpo.gov]

[[Page 16597]]

Part IV

Environmental Protection Agency

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40 CFR Part 68

List of Regulated Substances and Thresholds for Accidental Release Prevention; Proposed Rule

[[Page 16598]]

ENVIRONMENTAL PROTECTION AGENCY

40 CFR Part 68

[FRL-5657-7]

List of Regulated Substances and Thresholds for Accidental Release Prevention; Proposed Amendments

AGENCY: Environmental Protection Agency (EPA).

ACTION: Proposed rule.

SUMMARY: The Environmental Protection Agency (EPA) is proposing several modifications to the rule listing regulated substances and threshold quantities under section 112(r) of the Clean Air Act as amended. EPA is proposing to delete the category of Division 1.1 explosives (as listed by DOT) from the list of regulated substances. Regulated flammable substances in gasoline used as fuel and in naturally occurring hydrocarbon mixtures prior to initial processing are proposed for exemption from threshold quantity determinations, and a clarification of the provision for threshold determination of flammable substances in a mixture is proposed. Modifications to the definition of stationary source are proposed to clarify the exemption of transportation and storage incident to transportation and to clarify that naturally occurring hydrocarbon reservoirs are not stationary sources or parts of stationary sources. In addition, EPA is clarifying that the Chemical Accident Prevention Provisions do not apply to sources located on the Outer Continental Shelf. EPA believes these proposed changes will better focus accident prevention activities on stationary sources with high hazard operations and reduce duplication with other similar requirements.

DATES: Comments. Comments must be submitted on or before May 15, 1996 unless a hearing is requested by April 25, 1996. If a hearing is requested, written comments must be received by May 30, 1996. Public Hearing. Anyone requesting a public hearing must contact EPA no later than April 25, 1996.

As naturally occurring hydrocarbon mixtures undergo processing in a petroleum refining process unit or a natural gas processing plant, the potential for a vapor cloud explosion likely increases. The processes are more complex, there may be significant on-site congestion from buildings and equipment, flammable substance may be stored in large quantities, and there may be many ignition sources. The components of crude oil and condensates may be separated based on volatility. The more volatile mixtures (or purified substances) resulting from such processing may meet the criteria for NFPA 4 and, therefore, would need to be considered for threshold determination in accordance with the provisions for threshold determination of regulated flammable substances in mixtures, as discussed in the next section of this preamble. Similarly, before gasoline is finally formulated into a fuel for internal combustion engines, during processing in a refinery, it may meet the criteria for NFPA 4 and, therefore, would need to be considered for threshold determination in accordance with the provisions for threshold determination of regulated flammable substances in mixtures.

EPA requests comments on the proposed exemption from threshold determination for gasoline used as fuel for internal combustion engines and specifically requests comments on whether the qualifying phrase, ``used as fuel for internal combustion engines,'' is a necessary part of the exemption. EPA also requests comments on the proposed exemption for regulated substances in naturally occurring hydrocarbon mixtures prior to initial processing and on the proposed definitions related to the exemption for naturally occurring hydrocarbon mixtures.

C. Clarification of Threshold Determination of Regulated Flammable Substances in Mixtures

In the final rule, EPA provided flash point and boiling point criteria for determining whether a mixture containing a regulated flammable substance is subject to threshold determination. Although these flash point and boiling point criteria are associated with an NFPA rating of 4, the NFPA rating was not specifically cited as a criterion. As discussed in the preamble to the List Rule, EPA believes that mixtures that do not have an NFPA rating of 4 should not be subject to threshold determination. Based on comments from the regulated community, EPA now believes the flash point and boiling point criteria, although they are part of the criteria for the NFPA 4 rating, are not adequate by themselves to identify mixtures with the NFPA 4 rating. As noted above, the NFPA 4 rating applies to substances that will rapidly or completely vaporize at atmospheric pressure and normal ambient temperature or that are readily dispersed in air, and that will burn readily. Like gasoline and crude oil, which have NFPA 3 ratings for flammability, other mixtures may contain low boiling flammable components that would cause the mixture to meet the flash point and boiling point criteria, but also contain higher boiling components that would prevent the mixture from rapidly or completely vaporizing. To clarify threshold determination for mixtures, EPA is proposing to provide that, for mixtures that have one percent or greater concentration of a regulated flammable substance, the entire weight of the mixture shall be treated as the regulated substance unless the owner or operator can demonstrate that the mixture does not have an NFPA flammability hazard rating of 4, as defined in the NFPA Standard System for the Identification of Fire Hazards of Materials, NFPA 704- 1990. EPA requests comments on this proposed clarification, which would be in addition to the specific exemption proposed for gasoline and naturally occurring hydrocarbons.

D. Definition of Stationary Source

The List Rule defined stationary source to exclude transportation, including storage incident to transportation, provided such transportation is regulated under 49 CFR parts 192, 193, or 195. In addressing issues related to EPCRA, which also excludes transportation in commerce for most purposes, EPA has interpreted the transportation exclusion to exempt substances being transported in commerce or in storage under active shipping papers and to treat as a ``stationary item'' any storage in containers not

under active shipping papers. In the List Rule, EPA referred to DOT pipeline regulations under 49 CFR parts 192, 193, and 195, and stated in the Preamble that pipelines, transfer stations, and other activities already covered by DOT would be excluded. Furthermore, EPA intended to exclude from the definition of stationary source all transportation and storage incident to such transportation to be consistent with EPCRA. EPA believes the List Rule definition of stationary source clearly covers transportation containers only when they are no longer in transportation in commerce and clearly excludes pipelines as defined by DOT; however, based on comments from the regulated community, EPA believes there still may be potential for overlap and confusion regarding the jurisdiction and regulatory responsibility of EPA and DOT for pipelines and for transportation containers at stationary sources. The Agency has received questions regarding the language in the stationary source definition that refers to ``transportation containers no longer under active shipping papers.'' Both EPA and DOT agree this term would generally apply to containers that are not in transportation in commerce and that are at the stationary source for purposes of storage, loading, or unloading that is not incidental to transportation in commerce. ``Transportation in commerce'' is defined by DOT pursuant to Federal Hazardous Materials Transportation Law (Federal HAZMAT Law, 49 U.S.C. sections 5107-5127). As a result of continued questions regarding the scope of Federal HAZMAT Law and the applicability of the regulations issued thereunder, DOT is currently working to better delineate and more clearly define the applicability of its regulations. DOT currently contemplates clarifying its jurisdiction through the rulemaking process. As a result, there may be a future need for EPA to further amend the definition of stationary source to better comport with DOT clarifications or actions. The Agency will continue to work closely with DOT to minimize overlap and confusion with respect to jurisdiction and items in transportation and will coordinate with DOT to ensure that consistent interpretations about regulations coverage are provided to the regulated community. EPA is proposing several amendments to the definition of stationary source to reflect more clearly EPA's intent. First, EPA is proposing to modify the definition of stationary source to clarify that exempt transportation shall include, but not be limited to, transportation activities subject to regulation or oversight under 49 CFR parts 192, 193, or 195, as well as transportation subject to natural gas or hazardous liquid programs for which a state has in effect a certification under 49 U.S.C. section 60105. DOT established safety standards for pipeline facilities used in the transportation of natural gas by pipeline in 49 CFR part 192, for liquefied natural gas facilities in 49 CFR part 193, and for pipeline facilities used in the transportation of hazardous liquids by pipeline in 49 CFR part 195. State programs with certifications under 49 U.S.C. section 60105 are comparable to the DOT

[[Page 16602]]

requirements and thus ensure public safety. In addition, EPA is proposing to modify the definition of stationary source to clarify that naturally occurring hydrocarbon reservoirs are not stationary sources or parts of stationary sources. This interpretation is consistent with EPA's policy under EPCRA. API concluded in the Hazard Assessment of Exploration and Production Facilities Potentially Subject to the Environmental Protection Agency's Risk Management Program Regulations (January 20, 1995) that the flow of hydrocarbons from reservoirs would not contribute to the magnitude of a catastrophic release scenario. This conclusion was based on consequence analysis of a range of fire and explosion events, assuming a range of handling conditions, types of equipment, and material compositions typical of exploration and production facilities. Finally, EPA is clarifying that the exemption for transportation containers in transportation in commerce or storage incident to such transportation is not limited to pipelines. EPA requests comments on these proposed revisions to the stationary source definition.

E. Applicability to Outer Continental Shelf

EPA is proposing an applicability exception for sources on the outer continental shelf (OCS sources).

Subpart A--General

2. Section 68.3 is proposed to be amended by adding the following definitions in alphabetical order and revising the definition of stationary source to read as follows:

Sec. 68.3 Definitions.

* * * *

Condensate means hydrocarbon liquid separated from natural gas that condenses due to changes in temperature, pressure, or both, and remains liquid at standard conditions.

Crude oil means any naturally occurring, unrefined petroleum liquid.

* * * *

Field gas means gas extracted from a production well before the gas enters a natural gas processing plant.

Natural gas processing plant (gas plant) means any processing site engaged in the extraction of natural gas liquids from field gas, fractionation of mixed natural gas liquids to natural gas products, or both. A separator, dehydration unit, heater treater, sweetening unit, compressor, or similar equipment shall not be considered a ''processing site" unless such equipment is physically located within a natural gas processing plant (gas plant) site.

Petroleum refining process unit means a process unit used in an establishment primarily engaged in petroleum refining as defined in the Standard Industrial Classification code for petroleum refining (2911) and used for the following: (1) Producing transportation fuels (such as gasoline, diesel fuels, and jet fuels), heating fuels (such as kerosene, fuel gas distillate, and fuel oils), or lubricants; (2) Separating petroleum; or (3) Separating, cracking, reacting, or reforming intermediate petroleum streams. Examples of such units include, but are not limited to, petroleumbased solvent units, alkylation units, catalytic hydrotreating, catalytic hydrorefining, catalytic hydrocracking, catalytic reforming, catalytic cracking, crude distillation, lube oil processing, hydrogen production, isomerization, polymerization, thermal processes, and blending, sweetening, and treating processes. Petroleum refining process units include sulfur plants.

* * * *

Produced water means water extracted from the earth from an oil or natural gas production well, or that is separated from oil or natural gas after extraction.

* * * *

Stationary source means any buildings, structures, equipment, installations, or substance emitting stationary activities which belong to the same industrial group, which are located on one or more contiguous properties, which are under the control of the same person (or persons under common control), and from which an accidental release may occur. A stationary source includes transportation containers that are no longer under active shipping papers and transportation containers that are connected to equipment at the stationary source for the purposes of temporary storage, loading, or unloading. A stationary source does not include naturally occurring hydrocarbon reservoirs. The term stationary source does not apply to transportation, including storage incident to transportation, of any regulated substance or any other extremely hazardous substance under the provisions of this part. Transportation includes, but is not limited to, transportation subject to oversight or regulation under 49 CFR parts 192, 193, or 195, or a state natural gas or hazardous liquid program for which the state has in effect a certification to DOT under 49 U.S.C. section 60105. Properties shall not be considered contiguous solely because of a railroad or gas pipeline right-of-way.

Section 68.10, as proposed at 60 FR 13543, is further amended by adding a paragraph (e) to read as follows:

Attachment 3

Custom Fuel Monitoring Schedule Approval Letter and Recent Fuel Sulfur Analysis

Bob Holden, Governor • Stephen M. Mahfood, Director
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF ENVIRONMENTAL QUALITY
P.O. Box 176 Jefferson City, MO 65102-0176

February 16, 2001

Mr. Ed D. Mize
Senior Environmental Engineer
Williams Pipelines, South Central
P.O. Box 20008
Owensboro, KY 42304

Dear Mr. Mize:

My staff has reviewed your request for a custom fuel monitoring schedule, dated January 10, 2001. Similar requests have been evaluated for other gas turbine facilities. Williams Pipelines may implement its custom fuel monitoring schedule as proposed in Attachment 1 of your letter.

Monitoring for nitrogen content will not be required provided that only pipeline quality natural gas is burned. Gas composition will conform to Federal Energy Regulatory Commission tariff specifications.

Sulfur content will be monitored on a three phase schedule of decreasing frequency as long as compliance with the minimal sulfur level is maintained. Phase I, duration six months, will monitor sulfur content twice per week. Phase II, duration eighteen months, will monitor sulfur content quarterly. Phase III, ongoing thereafter, will monitor sulfur content semi-annually during the first and third quarters of each year. Failure to attain the minimum sulfur standard will reinstate the most frequent sulfur monitoring schedule.

Consistent with a determination made by the U.S. Environmental Protection Agency, Region VI, the Gas Processors Association (GPA) "length of stain tube" test method may be used to determine sulfur content. GPA Standard 2377-86 must be followed in performance of this method.

This custom fuel monitoring schedule may be subject to re-examination in the event that fuel quality, composition, or supplier change. Sulfur monitoring shall return to the highest frequency following such a change.

If you should have any questions about the department's review of your custom fuel monitoring schedule, please contact Mr. Peter Yronwode, of my staff, at (573) 751-4817. Thank you for your cooperation in this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Steven Feeler

Steven Feeler
Enforcement Section Chief

SF:pyt

c: Refaat Mefrakis, APCP New Source Review Unit Chief
Jon Knodel, U.S. Environmental Protection Agency, Region VII
Kansas City Regional Office
Source File: 037-0048

HOUSTON LABORATORY
8880 INTERCHANGE DRIVE
HOUSTON, TEXAS 77054
PHONE (713) 660-0901

Certificate of Analysis No. H9-0103399-01

Williams Gas P/L - S. Central
3800 Frederica Street
Owensboro, KY 42301
ATTN: Darrell Morgan

03/27/01

PROJECT: Total Sulfur Analysis
SITE: Peculiar
SAMPLED BY: Williams Gas Pipeline
SAMPLE ID: Peculiar Compressor Sta

PROJECT NO:
MATRIX: NAT_GAS
DATE SAMPLED: 03/09/01 13:30:00
DATE RECEIVED: 03/23/01

ASTM D-3246

PARAMETER	RESULTS
Total Sulfur in ppm/Wt.	<1.0
Total Sulfur in Wt. %	<0.0001
Total Sulfur in gr/100 cu Ft.	<0.032

ANALYZED BY: HR DATE ANALYZED: 03/26/01
METHOD: ASTM D-3246 Sulfur, Total by Dohrman
NOTES:

COMMENTS:

QUALITY ASSURANCE: These analyses are performed in accordance with EPA guidelines for quality assurance.

SPL, Inc.
Analysis Request & Chain of Custody Record

SPL Work Order No.: 01033 99

SPL Page of

Company: Williams Natural Gas-South Central
Address: 24304 S Harper RD
Peculiar MO 64078
Contact: Phone/Fax: 785-229-3802
Field/Project: Stanton Gas Samples
Invoice to (company name): SAME
Contact: Phone/Fax: Bruce Lurtz 785-229-3802
Address: 3243 Nebraska RD
Ottawa KS 66067

Special Instructions:

Requested TA
- ☐ 24hr*
- ☐ 48hr*
- ☐ 72hr*
- ☐ Standard
- ☐ Other

* Surcharges May Apply

* Terms: Cylinders will be rented for $15/cyl. All cylinders checked out are to be returned within 21 days, whether they contain sample or not. Cylinders not returned after 30 days will be considered lost and will be billed at current replacement cost.

Requested Analysis

Sample ID	Sample Date	Sample Time	Sample Of	Duplica	Compo	Spot	Cylinder Tracking Info: Cylinder#	Date Out	Date In	Comments
SPL C 321	3/9/01	1:30PM	Natural Gas							
1103	3/12/01	9:45AM	"							

Sampled By-Print Name: John Coon
Signature:
Company Name:

	Date:	Time:		Date:	Time:
Relinquished By-Print Name: John Coon Signature:	3/20/01	10:00AM	Received By-Print Name: Signature:		
Relinquished By-Print Name: Signature:			Received By-Print Name: Signature:	3/23/01	0935

☑ 8880 Interchange Dr. Houston,TX 77054 (713) 660-0901
☐ 500 Ambassador Caffery Pkwy. Scott, LA 70583 (337) 237-4775
☐ 9221Highway 23 Belle Chasse, LA 70037 (504) 391-1337
☐ 1595 US 79 South Carthage, TX 75633 (903) 693-6242
☐ P.O. Box 3079 Laurel, MS 39442 (601) 428-0842
☐ 459 Hughes Dr. Traverse City,MI 49686 (616) 947-5777

June 6, 2001

GAS PIPELINES
South Central
P.O. Box 20008
3800 Frederica St.
Owensboro, Kentucky 42304
270/926-8686

Missouri Department of Natural Resources
Division of Environmental Quality
Air Pollution Control Program
P. O. Box 176
Jefferson City, MO 65102

SUBJECT: Operating Permit Application for Williams Gas Pipelines Central's Peculiar Compressor Station

To Whom It May Concern:

Williams Gas Pipelines Central, Inc. (WGPC) is submitting this Intermediate Operating Permit application for its Peculiar Compressor Station, located in Cass County, Missouri. This station is currently covered by Part 70 Operating Permit No. 037-0048-0001, issued on March 31, 1998.

The primary equipment at this facility has recently undergone several modifications under Missouri Construction Permit 072000-009 (issued July 12, 2000). Specifically, the two reciprocating compressor engines (Units E1 and E2) have been uprated and retrofit with low emission combustion technology. A natural gas-fired turbine has also been installed at the station. Due to the NO_x emission reductions from the recent modifications to the two engines, this facility is no longer a major source under Missouri's Part 70 regulations (10 CSR 10-6.065). As discussed in the construction permit, the potential to emit NO_x from the facility is now limited to less than 100 tons per year (tpy). Therefore, WGPC is requesting that the facility be covered by an Intermediate Operating Permit rather than a Part 70 Permit and that the modified and new equipment is reflected in the intermediate permit.

Attachment 1 contains completed permit application forms for this station. The forms have been completed according to the written instructions as well as verbal guidance from DNR personnel. Attachments 2 and 3 provide supporting documentation for this application.

The natural gas-fired turbine recently installed at this station is subject to the New Source Performance Standards (NSPS) for Stationary Gas Turbines (40 CFR 60, Subpart GG). Since the unit is just coming on line, performance tests have not yet been conducted for this turbine. WGPC has been in communication with DNR personnel regarding the timing of this testing. The emission standard for this turbine from 40 CFR 60.332(a)(2) is 150 ppmvd at 15% oxygen and ISO standard conditions. All of this information is summarized in the forms included as Attachment 1.

The NSPS also limits the sulfur content of the fuel burned in the turbine. Per 40 CFR 60.333(b), the fuel should not contain more than 0.8 weight percent (wt%) sulfur. The turbine is covered by a custom fuel monitoring schedule (CFMS) that was recently

approved by DNR. A copy of the CFMS is included in Attachment 3. The results of the sampling at this facility demonstrate that the turbine easily complies with 40 CFR 60.333(b). A copy of a recent fuel sulfur analysis at Peculiar is also included in Attachment 3. Other analyses have yielded the same results as the one included with this letter.

The recent construction permit for this station includes operating limitations for the two reciprocating engines under certain operating conditions. The specific limitations vary depending on how many units are operating and at what levels. For the specific limitations, please refer to the construction permit. WGPC is requesting that all of the operating restrictions be included in the operating permit just as they appear in the construction permit and that the compliance determination methods (including testing, periodic monitoring and recordkeeping) also be included without revision in the operating permit.

Please note that this station is located in Cass County, which is defined as part of the Kansas City Metropolitan Area in 10 CSR 10-6.020(2)(K)(1). For this reason, the regulations found in 10 CSR 10-2 (Chapter 2) are cited as applicable in the attached Form OP-A03. The regulations found in 10 CSR 10-3 (Chapter 3) are not applicable to the facility since it is not located in the "Outstate Missouri Area". The Kansas City Health Department regulations (Chapter 8) are not applicable to the facility since it is not located within the city limits of Kansas City. This determination was verified with Mike Manning of the Kansas City Air Quality Section. All of these determinations are reflected in the attached Form OP-A03.

Please note that an application fee of $100 is included with this application. WGPC is committed to maintaining all of its operations in compliance with all state and federal regulations. Please contact me at (918) 633-2788 if I can be of any assistance during your review.

Sincerely,

Darrell Morgan for

Ed D. Mize
Senior Environmental Engineer

Attachments

Attachment 1

Completed Permit Application Forms

ORIGINAL

GAS PIPELINES CENTRAL
P.O. Box 20008
3800 Frederica St.
Owensboro, Kentucky 42304
270/926-8686

April 28, 2000

David P. Boergers, Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D. C. 20426

Re: OEP/DEER/GHG
Williams Gas Pipelines Central, Inc.
Docket No. CP00-82-000
§ 375.308(x)

Dear Mr. Boergers:

The following information is provided to assist staff in its analysis of the above referenced certificate application.

1. Provide an explanation and respond fully addressing each issue included in the attached comment letters. Be sure to address comments a through d in Attachment 1 and comments 1 through 6 in Attachment 2.

Attachment 1

(a) Safety issues - **In the summer of 1998, the Sedalia 20" pipeline was uprated by water test. During this process, there would have been numerous releases of natural gas as follows: (1) initially blowing down the line for water testing; (2) purging and removing the water from the line; (3) catching and launching pigs from Peculiar Station for cleaning and water removal; (4) general blow down and purging of the line during pipeline replacements; and (5) placing the line back in service (purging). In addition, the line coming into/leaving the station is cleaned twice a year using an internal cleaning device (pig). Also, Williams conducts Emergency Shutdown Testing on an annual basis.**

On September 19, 1998, a rupture disc failed at Peculiar Station at approximately 12:00 a.m. and the release of natural gas continued until approximately 2:00 a.m. when the valve below the rupture disc was closed. Due to a construction oversight, the rupture disc had not been replaced to accommodate the higher operating pressure of the Sedalia line. The Peculiar Fire Chief was present with Williams' personnel until the valve was closed at the rupture disc. Residents within 1/2 mile of the station were evacuated.

000505020 9-2

The remainder of the 1998-1999 heating season saw two additional releases of natural gas from the station because of failed rupture discs. The releases occurred during the day, lasted approximately 5 minutes each, and no public safety officials were notified. In June 1999, the rupture discs were replaced with relief valves. There have been no releases of high pressure gas since the relief valves were installed other than for the annual ESD testing.

Williams conducts annual meetings with local police and fire officials and county emergency disaster personnel as a part of Williams' Public Education and Contractor Awareness program.

(b) Location and zoning issues, noise and property values - **As acknowledged by the Affected and Concerned Property Owners, the Peculiar compressor station was constructed long before the subdivisions were developed. It would not be feasible, either financially or environmentally, to move the existing facilities as proposed.**

New mufflers will be installed on the existing engines to reduce noise levels at the entire station to or below the required 55dBA established by FERC regulations. In addition, the new turbine will be installed in a building which will further reduce noise levels. Williams will also consider using berms and/or landscaping techniques in controlling noise pollution if necessary.

Williams has no policy to offer compensation to property owners for perceived property devaluation.

(c) County access roads - **243rd Street and Harper Road are both secondary dirt/gravel roads that receive minimal county maintenance. Williams contacted the Cass County Road and Bridge department for suggestions in minimizing dust during construction and the costs involved. In addition to the option of wetting the road down, the County provided costs for improving the existing dirt/gravel roads. The costs range from $16,000 per mile to apply an oil and chip seal on the road, to approximately $65,000 per mile for an oil and chip road.**

(d) Soil contamination - **Williams was unaware of the possible soil contamination. A call to the Missouri Conservation County Extension Office revealed that no official testing has been done to date. However, the County Extension Agent said that the rings could be caused by mushrooms growing underground, and that it is not uncommon in the area.**

Attachment 2

1) Noise - **Peculiar compressor station has been in operation since 1954 and has been used primarily as a peaking unit in the winter. Recent sound surveys**

conducted at Peculiar station show that the station currently exceeds the required noise level established by the FERC. Since Williams proposes to modify the existing units and add a new turbine, the entire station will have to meet the FERC noise requirements. A copy of a letter sent to Mr. Rew on April 19, 2000 addressing the noise levels is attached.

2) House vibration - **Peculiar station currently operates on a limited basis and any associated vibration is of a short duration. The modifications proposed to the existing engines at Peculiar station should minimize any vibration problem.**

3) Safety - **Before Williams increased the operating pressure of the Sedalia 20" pipeline, the line was water tested to 1.5 times the proposed increased pressure to insure the pipeline would withstand the higher pressure. There have been no safety issues related to the Sedalia 20" pipeline and the line is in compliance with DOT Office of Pipeline Safety requirements.**

4) Property value - **As stated above, the Peculiar compressor station has been in operation since 1954. The houses near the station were constructed some time after the station. Williams has no policy to offer compensation to property owners for perceived property devaluation.**

5) Environmental impact - **There will be minimal environmental impact to the surrounding area since the new turbine will be constructed on existing station property. Some increased equipment noise and activity will occur as a result of construction, but will be short-term in nature.**

6) Change in usage of station - **When Peculiar station was originally constructed, it was used as a base load station. However, in recent years the station has been operated as a winter peaking station and has had limited run time. With the addition of the power plant load, the station will once again be operated more as a base load station with daily incremental usage through the summer months in addition to its winter peaking function.**

2. For all gas releases which occurred within the previous year where public safety officials were notified (as mentioned in the letter) or which were significant unscheduled releases provide:

As stated in response to question 1, attachment 1(a), there have been no gas releases within the previous year where public safety officials were notified or where significant releases of gas were involved. The following information is provided for the most recent occurrence when public safety officials were notified.

a) date of occurrence - **September 19, 1998**
b) location of gas release - **Williams' property located at 243rd and Harper, Cass County, Missouri (SE, SE/4, Section 29, Township 45 North, Range 32 West and NE, NE/4 Section 32, Township 45 North, Range 32 South)**
c) reason for gas release (i.e., overpressurization, maintenance, etc.) - **a rupture disc failed at Peculiar Station and the release of natural gas continued until the valve below the rupture disc was closed. Due to a construction oversight, the rupture disc had not been replaced at the time the Sedalia line was uprated to accommodate the higher operating pressure of the line.**
d) quantity of gas released - **approximately 6.9 MMcf of gas was released**
e) duration of gas release - **the release lasted approximately 2 hours.**

3. Identify the location of all pipeline or compressor station pressure relief and/or blowdown devices at or near Peculiar Compressor Station. Does Williams schedule maintenance blowdowns to occur during daytime hours and notify landowners of such occurrences? Describe any noise control used on pressure relief and blowdown devices at or near the Peculiar Compressor Station.

Presently, each engine has a relief valve located on the discharge piping and on the fuel run. Blowdown devices are located on both the 12" and 20" pig catchers and launchers and in the manifold area.

Williams does schedule blowdowns during daylight hours. It is a Williams' policy that when long sections of pipeline are scheduled for blowdown, landowners in close proximity to the blow down are notified of such situations. Landowners are not normally notified when catching and/or launching cleaning pigs since the blowdown only lasts a few minutes.

There are no devices presently used to control noise on pressure relief valves or blowdown devices at Peculiar station.

Responses to questions 1-3 were provided by Bruce Lurtz, District Manager, 785-229-3801.

4. Provide a revised sound survey of the Peculiar Compressor Station site property line and nearby noise-sensitive areas for the existing compressor units, **when operated at full load**. Include a large scale (1:3,600 or greater) plot plan identifying the noise measurement locations and list the time of day, duration of measurements, weather conditions, wind speed and direction, and other noise sources present during the survey.

The November noise study at Peculiar station measured noise contributions on one engine operating at 15-20% load. That study showed that even at this reduced load, the station exceeded the current FERC noise limits at the nearest noise sensitive areas. Since Peculiar station is "grandfathered", it is not currently subject to the noise limitations. Williams is scheduled to conduct a second noise study at Peculiar

station on May 3. Again, it will be almost impossible to operate one, much less both, of the engines at full load. By restricting gas flow through the valving, Williams can achieve close to full load on one unit for the purpose of a noise test. However, the valving itself will contribute additional noise and will not represent normal operating conditions. By modifying the existing engines, the "grandfathered" noise exemption will no longer apply to the station. The new and upgraded horsepower and related facilities will be designed and constructed in such a manner that the noise contribution from Peculiar station will not result in noise levels at the nearest noise sensitive areas that exceed the maximum allowed standard of 55 dBA required by the FERC.

Response provided by Charles Holcomb, P.E., Manager, Technical Services - Plant Design, 270-688-6333.

5. Provide the status (date filed, date received, or date expected) of the construction and operating permits and approvals for the proposed additional compressor at the Peculiar Compressor Station from the Missouri Department of Natural Resources, Air Pollution Control Program.

Mr. Ken Volmert with the Missouri Department of Natural Resources reported that the data submitted by Williams on January 24, 2000 and supplemented on March 16, 2000 is still being reviewed. It is estimated that permits will be issued by the end of May, 2000.

Response provided by E. D. Mize, Senior Environmental Engineer, 918-633-2788.

6. Specify the class location(s) of the proposed pipeline according to the U.S. Department of Transportation Pipeline Safety Regulations under section 192.5

The 1.5 mile proposed pipeline beginning in Section 19 and ending in Section 32, Township 16 South, Range 20 East, Franklin County, Kansas, will be constructed in a Class 1 location.

Response provided by John Hamlin, Pipeline Safety Coordinator, 270-688-6965.

7. Provide an 8 1/2" x 11" scaled plot plan of the Peculiar Compressor Station, showing station property and fence line, existing and proposed compressor buildings, and any nearby noise sensitive areas.

An 8 1/2" x 11" scaled plot plan of the Peculiar Compressor Station, showing station property and fence lines, existing and proposed compressor buildings, and any nearby noise sensitive areas is attached.

Response provided by David N. Roberts, Manager, Tariffs and Regulatory Analysis, 270-688-6712.

Very truly yours,

David N. Roberts, Manager
Tariffs and Regulatory Analysis

Attachments

xc: Service List
Darren & Julie Rew
Michael Dailey

Robert S. Bahnick
Vice President
Operations, Central
270/688-6600
270/683-5657
robert.s.bahnick@williams.com

GAS PIPELINE
SouthCentral
P.O. Box 20008
3800 Frederica St.
Owensboro, Kentucky 42304
270/926-8686

April 19, 2000

Mr. Darren Rew
24112 South Tanaine Lane
Peculiar, Missouri 64078

Subject: Williams Gas Pipelines Central, Inc.'s Peculiar Compressor Station

Dear Mr. Rew:

You have expressed concerns to employees of Williams Gas Pipelines Central, Inc. about noise from Williams' Peculiar Compressor Station, especially in light of Williams' recent filing at the Federal Energy Regulatory Commission (FERC) to upgrade its Peculiar Compressor Station. Williams is committed to reducing the noise levels at the Peculiar Compressor Station as part of its station upgrade.

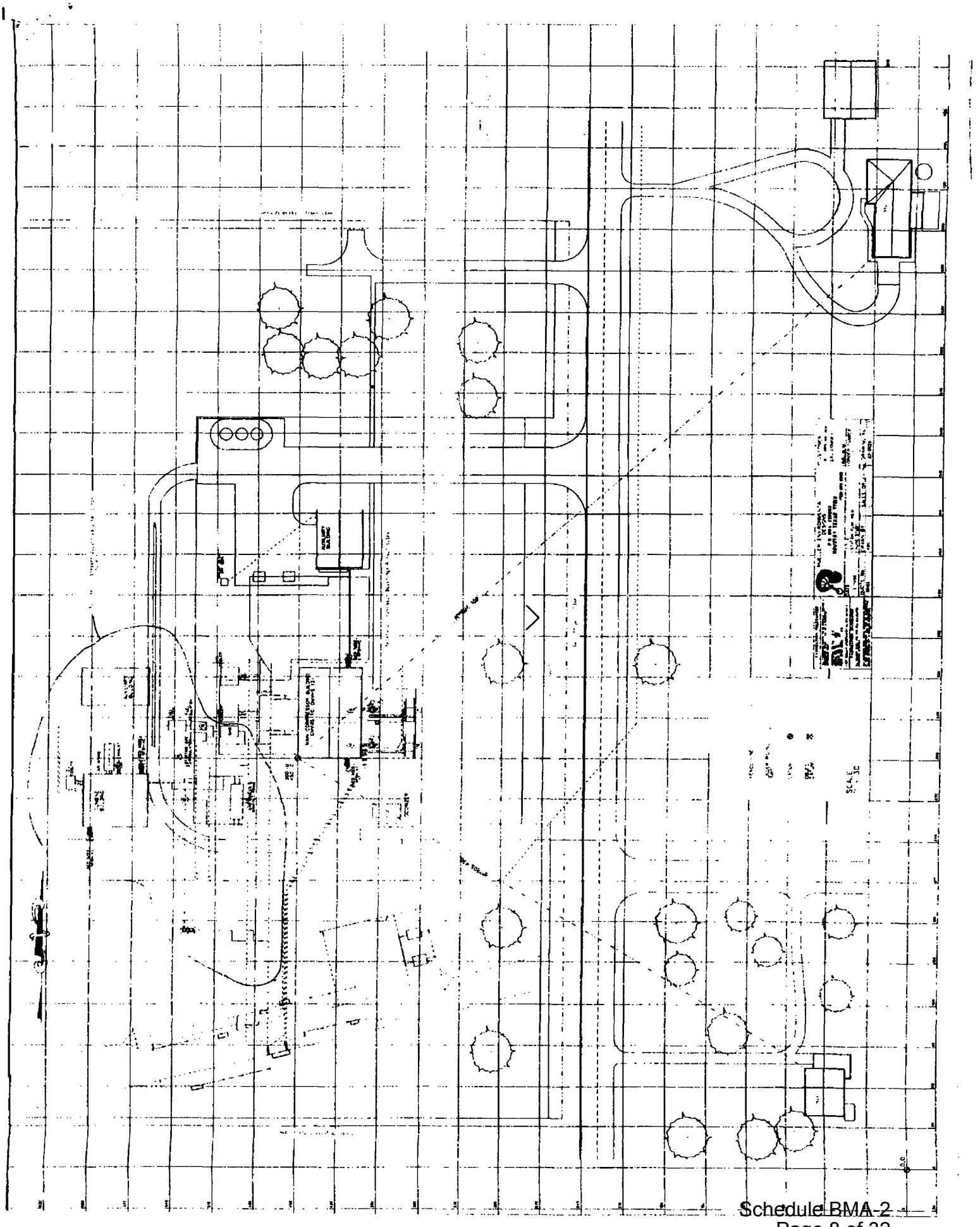
Williams' filing to upgrade its Peculiar Compressor Station proposes to upgrade the two existing compressor units and install a new turbine compressor. As part of the upgrade of the existing compressors, Williams will make the necessary modifications to the intake, exhaust, and cooling systems replacing as necessary with systems that will reduce noise levels. In addition, the existing and new compressor buildings will be insulated as required to reduce the noise level. As part of this upgrade, Williams has committed to the FERC that it will comply with the FERC's maximum noise level of 55 (Dba) Ldn at the closest noise sensitive area. This will be much lower than the current noise level.

I hope that this letter alleviates your concerns about future station noise levels. Should you have any additional concerns or questions, please feel free to contact Bruce Lurtz at 785/229-3801.

Sincerely,

BSB:pd

copy to: John Cary
Bart Wherritt



STATE OF KENTUCKY)
)
COUNTY OF DAVIESS)

ss.

David N. Roberts, being first duly sworn on his oath, deposes and says that he has read the foregoing and that the information contained therein is true and correct to the best of his knowledge, information and belief.

David N. Roberts

Subscribed and sworn to before me this 28th day of April, 2000.

Notary Public
Kentucky State at Large

My Commission expires August 26, 2003

ORIGINAL

Williams

GAS PIPELINES CENTRAL
P.O. Box 20008
3800 Frederica St.
Owensboro, Kentucky 42304
270/926-8686

May 12, 2000

David P. Boergers, Secretary
Federal Energy Regulatory Commission
888 First Street, N. E.
Washington, D. C. 20426

Re: OEP/DEER/GHG
Williams Gas Pipelines Central, Inc.
Docket No. CP00-82-000
§ 375.308(x)

Dear Mr. Boergers:

On May 1, 2000, Williams Gas Pipelines Central, Inc. (Williams) filed a response to the above referenced data request. Question 4 requested a revised sound survey of the Peculiar Compressor Station site at the property line and nearby noise-sensitive areas for the existing compressor units, when operated at full load.

Mueller Environmental Designs performed a noise study of the Peculiar compressor station on May 3, 2000. Full load for the horsepower was achieved by restricting the suction gas to the compressors. Due to pipeline conditions only one engine could be operated at 100% load. Since both units are identical, the measured numbers can be increased by 3 dB to account for the second unit. Noise measurements were taken at the two closest NSAs and at the four property corners of the station. The noise measured was as follows:

NSA #1	61 dBA
NSA #2	59 dBA
NW Corner	53 dBA
NE Corner	51 dBA
SW Corner	61 dBA
SE Corner	57 dBA

No road noise was present to contaminate the readings. However, the valve positions used to create the 100% load condition may have increased the amount of piping noise present in relation to normal operating conditions.

AJ

0005170456 -2

The test was performed from 2:00 p.m. to 4:00 p.m. The sky was mostly clear and a light breeze was blowing from the Southwest. The temperature was 78° F. Suction pressure was 525 psig, with a 675 psig discharge and a flow rate of 10 MMSCFD.

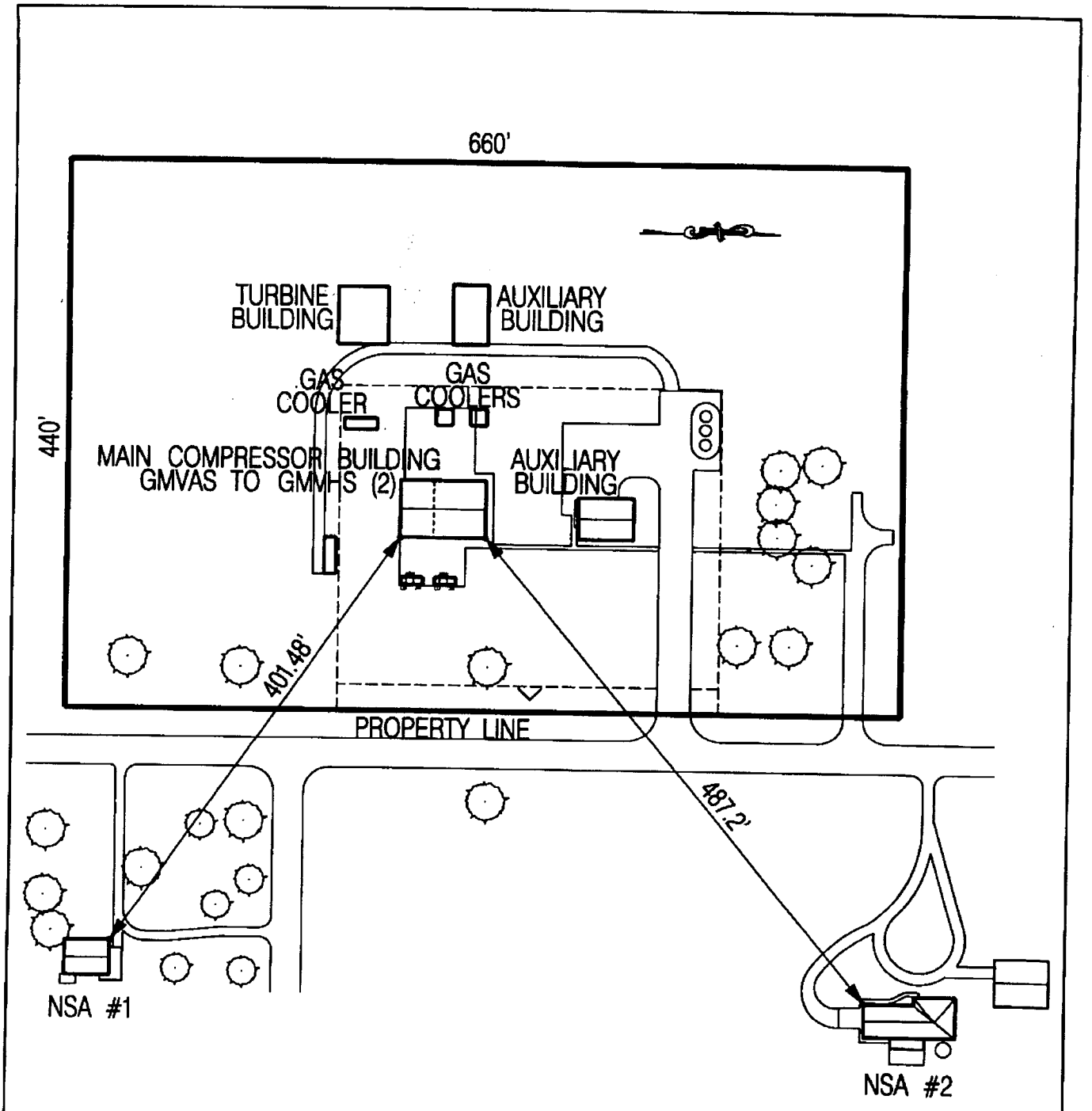
Very truly yours,

David N. Roberts

David N. Roberts, Manager
Tariffs and Regulatory Analysis

Attachment

xc: Service List
Michael Dailey
Darren & Julie Rew



Williams

GAS PIPELINES CENTRAL

STATION LAYOUT FOR PECULIAR COMPRESSOR STATION
IN SEC. 29 & 32, T45N, R32W, CASS CO., MO.

REVISIONS				DWG. NO.	REV. NO.
NO.	DATE	BY		SK-4-28-A-1	0
DRAWN J.JAMES	CHECKED	APPROVED		SCALE NONE	DATE 4/28/00

Williams

GAS PIPELINE
Texas Gas

INTEROFFICE MEMORANDUM

TO: Mr. D. N. Roberts **DATE:** August 1, 2000

FROM: M. A. Smith
MAS

SUBJECT: Peculiar Compressor Station
FERC Order Issuing Certificate
Calculated Far-Field Sound Data

In the Order Issuing Certificate granted for the Pleasant Hill Expansion Project, the Federal Energy Regulatory Commission (FERC) requires that Williams Gas Pipeline-Central provide far-field sound data prior to commencing construction. Specifically, the Certificate requires the resulting noise levels that will be encountered at the closest Noise Sensitive Area (NSA) after the proposed equipment has been installed and put in operation.

Attached is a letter from Mueller Environmental Designs (MED) which includes two (2) sound data tables. The first table, labeled **Far Field Data**, indicates the resultant far field noise levels of each piece of equipment, with line #5 indicating the cumulative noise level at the closest NSA (NSA #1) including the cooling fans. As you can see from the data, the resultant noise level at NSA #1 is 48 dBA (54.4 dBA Ldn). NSA #1 is located approximately 402 feet from the southeast corner of the existing compressor building.

The second table in the letter, labeled **Attenuation Data**, gives the Dynamic Insertion Loss (DIL) or the Sound Transmission Loss (STL) of the various pieces of silencing equipment being installed. This data indicates how much attenuation occurs at each frequency level to achieve the required noise levels at NSA #1.

Also attached is a sketch showing the revised location of the new facilities, with respect to NSA #1, for which this sound data was calculated. The proposed turbine was relocated to its current position due to poor soil conditions at the originally proposed site. Relocating the turbine to the new site will also improve noise abatement at NSA #1 by allowing the inclusion of a sound barrier wall. With this wall installed between the new turbine building and the existing compressor building, a very effective sound barrier is created to shield the NSA from equipment noise.

Please call if you have any questions or require additional information.

MAS:dlb

Attachments

c: Mr. B. S. Bahnick
Mr. R. N. Ficken
Mr. R. L. Barron, Sr.
Mr. R. A. Englehart
Mr. B. D. Lurtz
Mr. C. C. Holcomb
Mr. D. L. Goedde
Mr. J. B. McMaine
Mr. B. I. Provence
Mr. F. J. Mueller, Mueller Environmental Designs, Inc.
File

MUELLER ENVIRONMENTAL DESIGNS, INC.

March 30, 2000

Mike Smith
Williams Gas Pipelines
3800 Frederica Street
Owensboro, Kentucky 43202

Ref: Peculiar Compressor Station Pre-Horsepower Construction Noise Data For FERC Filing
MED 99165

Dear Mike,

This is in response to a request by Chuck Holcomb to provide Williams Gas Pipeline equipment far field sound data and attenuation curves for the upgraded reciprocating engines and new gas turbine to be installed at the Peculiar Compressor Station.

Far Field Data

	Octave Band Center Frequency (Ref 20μ Pascal) Hz										
	31.5	63	125	250	500	1000	2000	4000	8000	dBA	Ldn
1.	51	50	42	33	26	23	22	20	20	32	
2.	60	47	37	30	24	21	20	19	22	30	
3.	53	47	37	30	24	21	20	20	23	30	
4.	60	54	45	31	21	24	25	28	19	35	
5.	70	63	53	48	45	42	40	37	33	48	54.4

1. Lp - far field intake noise level of upgraded GMV-10 at NSA # 1
2. Lp - far field exhaust noise level of upgraded GMV-10 at NSA # 1
3. Lp - far field intake noise level of Solar Saturn 20 at NSA # 1
4. Lp - far field exhaust noise level of Solar Saturn 20 at NSA # 1
5. Lp - far field noise level of all upgraded and new equipment at NSA # 1 including all fin fan coolers.

Attenuation Data

	Octave Band Center Frequency - Hz								
	31.5	63	125	250	500	1000	2000	4000	8000
6.	2	6	22	35	48	51	53	53	49
7.	23	34	40	39	39	39	39	33	13
8.	2	8	20	31	41	51	53	56	62
9.	15	21	29	42	49	45	40	31	27
10.	0	6	7	11	14	13	13	8	6
11.	0	12	23	28	37	45	49	54	51
12.	2	20	39	44	58	60	64	66	63

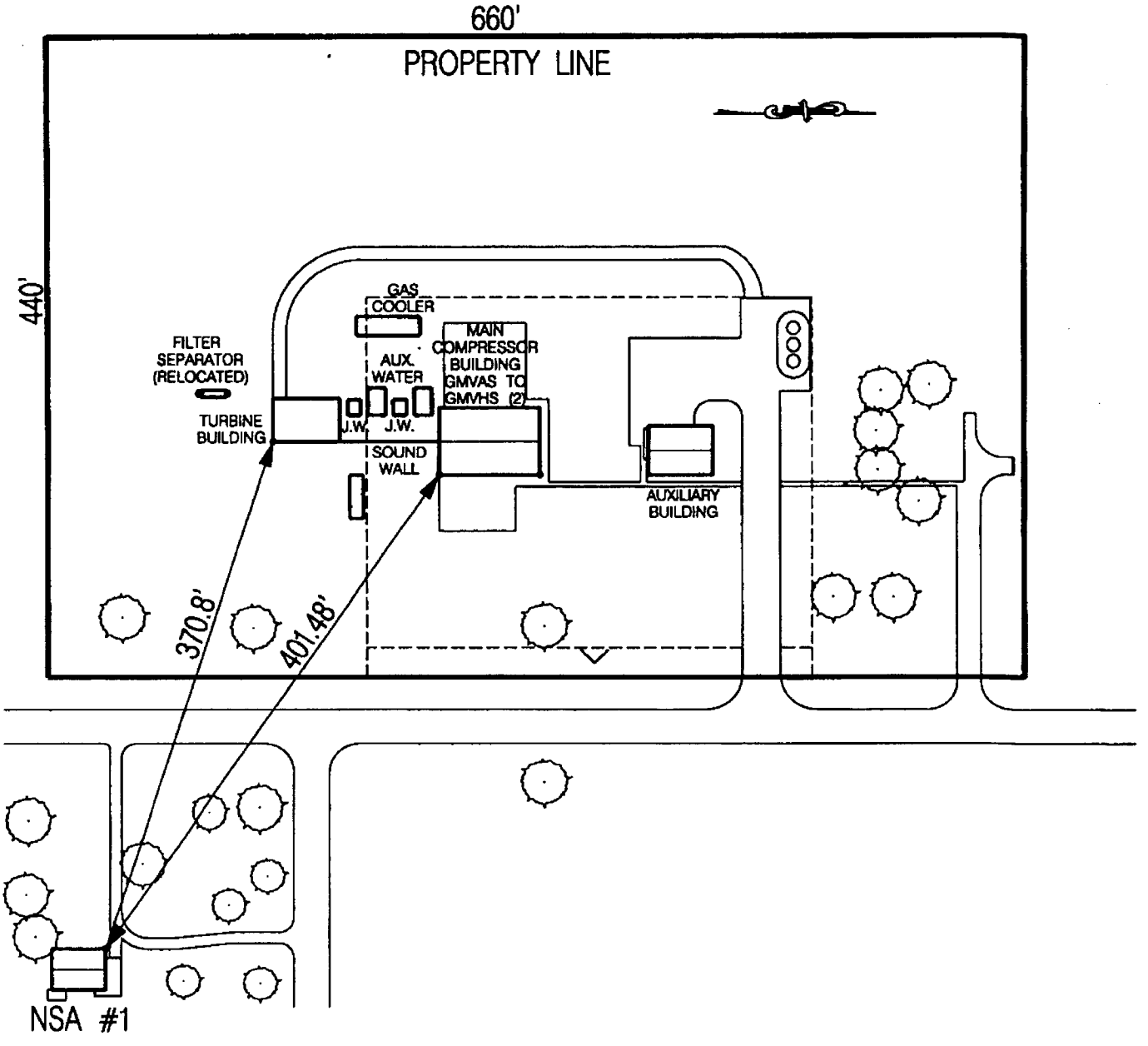
6. DIL of intake air filter/silencer of upgraded GMV-10
7. DIL of exhaust silencer of upgraded GMV-10
8. DIL of intake air filter/silencer of Solar Saturn 20
9. DIL of exhaust silencer of Solar Saturn 20
10. Transmission Loss of sound barrier
11. Transmission Loss of Reciprocating Engine Compressor Building
12. Transmission Loss of Gas Turbine Engine Compressor Building

Should you require additional information or have any questions please contact us at the number below.

Regards,

Fred Mueller

P.O. BOX 130882 • HOUSTON, TEXAS 77219 • 713-465-0995 • FAX 713-465-0997



Williams SM

GAS PIPELINES CENTRAL

STATION LAYOUT FOR PECULIAR COMPRESSOR STATION IN SEC. 29 & 32, T45N, R32W, CASS CO., MO.

REVISIONS				DWG. NO.	REV.
NO.	DATE	BY			
1	7/28/00	J.JAMES	ADDED TURBINE BUILDING	SK-4-28-A-1	1
				Schedule BMA-2	
DRAWN	CHECKED	APPROVED		SCALE	DATE
J.JAMES				NONE	4/28/00

STATE OF MISSOURI
Mel Carnahan, Governor • Stephen M. Mahfood, Director
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF ENVIRONMENTAL QUALITY
P.O. Box 176 Jefferson City, MO 65102-0176

JUL 12 2000

Ed. D. Mize
Senior Environmental Engineer
Williams Gas Pipelines Central, Inc.
One Williams Center
P.O. Box 3288
Tulsa, OK 74101

RE: Peculiar Compressor Station
New Source Review Permit Application
Project No. 2000-01-087

Dear Mr. Mize:

Enclosed with this letter is your permit to construct. Please note the special conditions on the accompanying pages. The document entitled, "Review of Application for Authority to Construct," is part of the permit and should be kept with this permit in your files.

You must operate in accordance with these special conditions, your new source review permit application, and with your amended operating permit for continued compliance. Please check your operating permit as it contains all applicable requirements for your installation, including any special conditions from your new source review permit.

The reverse side of your permit certificate has important information concerning standard permit conditions and your rights and obligations under the laws and regulations of the State of Missouri.

If you have any questions regarding this permit, please do not hesitate to contact me at (573) 751-7726, or you may write to me at the Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102.

Thank you,

AIR POLLUTION CONTROL PROGRAM

Robert Mefrakis

Robert H. Mefrakis, P.E.
New Source Review Unit Chief

RHM:KVp

Enclosures

c: Kansas City Regional Office
PATS File
Permit No.: 072000-009

STATE OF MISSOURI

DEPARTMENT OF NATURAL RESOURCES

MISSOURI AIR CONSERVATION COMMISSION

PERMIT TO CONSTRUCT

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

Permit Number: 072000-009 Project Number: 2000-01-087

Owner: Williams Gas Pipelines Central, Inc.

Owner's Address: 3800 Frederica Street, Owensboro, KY 42301

Installation Name: Peculiar Compressor Station

Installation Address: RFD 1, Peculiar, MO 64078

Location Information: Cass County, S29&S32, T45N, 32W

Application for Authority to Construct was made for:

Conversion of two (2) 1,350 horsepower Cooper-Bessemer GMVA-10 reciprocating engine-compressors to two (2) 2,000 horsepower Cooper-Bessemer GMVH-10C2 reciprocating engine-compressors and installation of one (1) 1,535 horsepower (at ISO conditions) Solar Saturn 20-T1600 turbine engine-compressor. This review was conducted in accordance with Section (6), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*.

☐ Standard Conditions (on reverse) are applicable to this permit.

☒ Standard Conditions (on reverse) and Special Conditions (listed as attachments starting on page 2) are applicable to this permit.

JUN 19 2000
JUN 19 2000

EFFECTIVE DATE

DIRECTOR OR DESIGNEE
DEPARTMENT OF NATURAL RESOURCES

MO 780-1204 (7-97)

STANDARD CONDITIONS:

Permission to construct may be revoked if you fail to begin construction or modification within two (2) years from the effective date of this permit. Permittee should notify the Air Pollution Control Program if construction or modification is not begun within 2 years after the effective date of this permit, or if construction or modification is suspended for one year or more.

You will be in violation of 10 CSR 10-6.060 if you fail to adhere to the specifications and conditions listed in your application, this permit, and the project review. Specifically, all air contaminant control devices shall be operated and maintained as specified in the application, associated plans and specifications.

You must notify the Air Pollution Control Program of the anticipated date of start up of this (these) air contaminant source(s). The information must be made available not more than sixty (60) days but at least thirty (30) days in advance of this date. Also, you must notify the DNR Regional office responsible for the area within which you are located within fifteen (15) days after the actual start up of this (these) air contaminant source(s).

A copy of this permit and permit review shall be kept at the installation address and shall be made available to Department of Natural Resources' personnel upon request.

You may appeal this permit or any of the listed special conditions as provided in RSMo 643.075. If you choose to appeal, the Air Pollution Control Program must receive your written declaration within thirty (30) days of receipt of this permit.

If you choose not to appeal, this certificate, the project review, your application, and associated correspondence constitutes your permit to construct. The permit allows you to construct and operate your air contaminant source(s), but in no way relieves you of your obligation to comply with all applicable provisions of the Missouri Air Conservation Law, regulations of the Missouri Department of Natural Resources, and other applicable federal, state, and local laws and ordinances.

The Department of Natural Resources has established a Technical Assistance Program to help in completing future applications or fielding complaints about the permitting process. You are invited to contact them at 1-800-361-4827 or 573-526-6627, or in writing addressed to Technical Assistance Program, P.O. Box 176, Jefferson City, MO 65102.

The Air Pollution Control Program invites your questions regarding this air pollution permit. Please contact the Construction Permit Unit at (573) 751-4817. If you prefer to write, please address your correspondence to the Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102, attention Construction Permit Unit.

Page No.	2
Permit No.	072000-009
Project No.	2000-01-087

SPECIAL CONDITIONS:

The permittee is authorized to construct and operate subject to the following special conditions:

I. Reciprocating Engines (E1, E2) and Turbine Engine (E04)

A. Emission Limitation: Williams Gas Pipelines Central, Inc. (WGPC) Peculiar Compressor Station shall emit no more than 98 tons of nitrogen oxides (NO_x) per year from the three (3) emission units permitted herein. WGPC Peculiar Compressor Station has voluntarily chosen this limitation to avoid major source review for this project and will demonstrate compliance with this limitation on an hourly basis by monitoring and controlling engine parameters. Adhering to th following control scheme will ensure that the emission rate from these three (3) emission units does not exceed 22.4 pounds of NO_x per hour.

1. Mode 1 - Only One (1) Reciprocating Engine Operating with or without the Turbine: One (1) reciprocating engine and the turbine (if operating) can operate anyplace within their respective operating envelopes. Worst-case hourly NO_x emissions from one (1) reciprocating engine and the turbin are less than 22.4 pounds per hour.

2. Mode 2 - Both Reciprocating Engines Operating without the Turbine: 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 b 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.

3. Mode 3 – Both Reciprocating Engines and the Turbine 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 A. This chart indicates that engin speed/engine loading configurations must be limited as follows:

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,

Page No.	3
Permit No.	072000-009
Project No.	2000-01-087

SPECIAL CONDITIONS:

The permittee is authorized to construct and operate subject to the following special conditions:

are less than 22.4 pounds per hour.

B. Recordkeeping: WGPC Peculiar Compressor Station shall use Attachment A or an equivalent form to record the following data one time every hour to demonstrate compliance with the requirements of Special Condition I.A:

- The identity of all engines operating at that instant; and
- 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 th requirements of the appropriate operating mode as outlined in Special Condition I.A. WGPC Peculiar Compressor Station shall maintain all records required by this permit for not less than five (5) years and shall make them available immediately to any Missouri Department of Natural Resources (MDNR) personnel upon request.

C. Performance Testing: WGPC Peculiar Compressor Station shall conduct a performance test of each reciprocating engine and the turbine engine to verify the respective engine manufacturers' NO_x emission factors used in Attachment A. This test shall also verify engine manufacturer's emission factors for carbon monoxide (CO) and volatile organic compounds (VOC) to calculate potential emissions for this project. The test shall be conducted in accordance with th following requirements:

1. Test Plan: WGPC Peculiar Compressor Station shall submit a completed Proposed Test Plan form (enclosed) to the MDNR Air Pollution Control Program (APCP) 30 days prior to the proposed test date. The Director of the APCP must approve the Proposed Test Plan before the emission testing is conducted.

2. Test Conditions: The performance tests of the reciprocating engines shall be conducted under several engine loading and engine speed configurations, ranging from 60-100% torque and 280-330 rpm, respectively. Due to demand limitations, it may not be possible to test the reciprocating engines at all points on their operating envelope, but an effort should be made to vary engine loading and engine speed to the extent possible (the test plan should discuss this situation in detail). Th performance test of the turbine engine shall be conducted under a limit d range of engine loading configurations, at least one of which is 100 % torque. Th s multipl test points are required since WGPC Peculiar Compressor Station has elected to vary engine loading and ngine speed

Page No.	4
Permit No.	072000-009
Project No.	2000-01-087

SPECIAL CONDITIONS:

The permittee is authorized to construct and operate subject to the following special conditions:

of the reciprocating engines to limit NO_x emissions during certain operational modes.

3. Test Date: WGPC Peculiar Compressor Station shall conduct the required performance tests within 60 days after achieving the maximum production rate at which each engine will be operated, but not later than 180 days after initial startup. The date of the performance test must be pre-arranged with the APCP a minimum of thirty (30) days prior to the proposed test date so that the APCP may arrange a pre-test meeting, if necessary, and assure that the test date is acceptable for an APCP observer to be present.

4. Test Report Submittal: WGPC Peculiar Compressor Station shall submit two (2) copies of the performance test reports to the Director of the APCP within 30 days of completion of the required performance tests. The report must include legible copies of the raw data sheets, analytical instrument laboratory data, and complete sample calculations from th required EPA Method for at least one (1) sample run. The test report is to fully account for all operational and emission parameters addressed both in permit conditions as well as in any other applicable state and federal laws and regulations.

5. Post-testing Requirement: WGPC Peculiar Compressor Station shall submit an amendment to this permit within 60 days of the test report submittal if the performance test indicates that the NO_x emission factors are higher than those used in Attachment A. WGPC Peculiar Compressor Station shall also submit a permit amendment if CO or VOC emission factors are substantially higher than those presented in WGPC Peculiar Compressor Station's permit application.

D. Noncompliance Reporting: WGPC Peculiar Compressor Station shall report any and all instances of noncompliance with this condition to the APCP Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after any instance of noncompliance with Special Condition I.A.

II. Turbine Engine (E04)

A. Emission Limitation: WGPC Peculiar Compressor Station shall comply with all emission limitations and conditions established in 40 CFR Part 60, Subpart GG, Standards of Performance for Stationary Gas Turbines, which are applicabl to the turbine ngine. This regulation stablishes a new source performance standard for NO_x and sulfur dioxide.

Page No.	5
Permit No.	072000-009
Project No.	2000-01-087

SPECIAL CONDITIONS:

The permittee is authorized to construct and operate subject to the following special conditions:

B. Monitoring, Test Methods and Procedures: WGPC Peculiar Compressor Station shall monitor turbine engine operations, and adhere to the test methods and procedures as specified in 40 CFR §60.334 and 40 CFR §60.335, respectively.

III. Operating Conditions for Reciprocating Engines (E1, E2) and Turbine Engine (E04)

A. Fuel Type: WGPC Peculiar Compressor Station shall use only pipeline grad natural gas in the three (3) engines permitted herein.

B. Engine Loading and Engine Speed: For the reciprocating engines, WGPC Peculiar Compressor Station shall maintain engine loading between 60-100% torque and engine speeds between 280-330 rpm, except during periods of startup and shutdown. For the turbine engine, WGPC Peculiar Compressor Station shall maintain engine loading between 60-100% torque except during periods of startup and shutdown.

C. Engine Operational Analyses: At the time of the initial performance test, WGPC Peculiar Compressor Station shall perform an engine operational analysis of all engines and identify the range of specific operating parameters, as appropriate, that the test has been conducted at, and which are to be used during ongoing operation. These parameters may include horsepower, torqu , engine speed, brake horsepower specific fuel consumption, fuel manifold temperature and pressure, air intake manifold temperature and pressure, and ignition timing. In general, the range of operating conditions maintained during the test shall be used during ongoing operation, although engine parameters that are affected by ambient or pipeline conditions will not be limited to the particular conditions that are present during the initial test.

IV. Continuous Compliance Assurance for Reciprocating Engines (E1, E2) and Turbine Engine (E04)

A. Routine Engine Monitoring: WGPC Peculiar Compressor Station shall conduct routine performance testing of each engine to verify that the NO_x emission limit of Special Condition I.A is not exceeded. This routine performance testing shall be conducted within six (6) months of the initial performance test required under Special Permit Condition I.C, and once every six (6) months thereafter. This testing is only required for engines that have operated more than 240 hours during th preceding six (6) month period. This testing may be conducted either in the same manner as the initial performance t st or through

Page N .	6
Permit No.	072000-009
Project No.	2000-01-087

SPECIAL CONDITIONS:

The permittee is authorized to construct and operate subject to the following special conditions:

the use of a portable test analyzer. This testing may be conducted at the current engines' operating conditions, meaning that validation at multiple operating conditions is not required of this ongoing testing. Special Conditions I.C.3, I.C.4, and I.C.5 shall apply to this routine, or ongoing, testing.

B. Operating Permit Amendment: WGPC Peculiar Compressor Station shall submit a revised Part 70 permit application within twelve (12) months or an intermediate permit application within thirty (30) days of startup of any of the engines permitted herein.

REVIEW OF APPLICATION FOR AUTHORITY TO CONSTRUCT AND OPERATE
SECTION (6) REVIEW
Project No: 2000-01-087
Installation ID No: 037-0048
Permit No: 072000-009

Peculiar Compressor Station
RFD 1, Peculiar, MO 64078
Cass County, S29&S32, T45N, 32W

Complete: April 14, 2000
Reviewed: June 1, 2000

Parent Company:
Williams Gas Pipelines Central, Inc.
3800 Frederica Street, Owensboro, KY 42301

REVIEW SUMMARY

- Willams Gas Pipelines Central (WGPC) Peculiar Compressor Station has applied for authority to convert two (2) 1,350 horsepower Cooper-Bessemer GMVA-10 reciprocating engine-compressors to two (2) 2,000 horsepower Cooper-Bessem r GMVH-10C2 reciprocating engine-compressors and install one (1) 1,535 horsepower (at ISO conditions) Solar Saturn 20-T1600 turbine engine-compressor.

- Hazardous air pollutant (HAP) emissions are expected to be less than *de minimis* levels from the proposed equipment.

- Subpart GG of the New Source Performance Standards (NSPS), Standards of Performance for Stationary Gas Turbines, applies to the turbine. None of the NSPS apply to the reciprocating engines.

- None of the National Emission Standards for Hazardous Air Pollutants (NESHAP) or currently promulgated Maximum Achievable Control Technology (MACT) regulation applies to the proposed equipment.

- No air pollution control equipment is being used in association with the new equipment.

- This review was conducted in accordance with Section (6) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Unconditioned NO_x potential emissions are above major source levels, but the installation has voluntarily requested this project's emissions be limited to 98 tons of NO_x per year to avoid major source review. Limiting NO_x to this level should limit all other criteria pollutants to less than major source levels for a named installation.

- This installation is located in Cass County, an attainment area for all criteria air pollutants except ozone (O_3).

The addition of the turbine compressor engine causes this facility to be 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.

- Ambient air quality modeling was performed to determine the ambient impact of NO_x and CO.
- Performance testing is required of this source.
- Approval of this permit is recommended with special conditions.

INSTALLATION DESCRIPTION

WGPC operates a natural gas compressor station in Cass County, Missouri along WGPC's 12-inch diameter and 20-inch diameter natural gas transmission pipelines. These pipelines are used for transportation of natural gas to final delivery points in th Kansas City, Missouri area. The station currently houses two (2) 1,350 horsepower Cooper-Bessemer GMVA-10 reciprocating engine-compressors. These engines are two-stroke design. WGPC Peculiar Compressor Station applied for, and later receiv d, a Part 70 Operating Permit (Permit Number 037-0048-0001) from the APCP dated March 31, 1998. The existing installation is classified a non-named source with existing potential emissions of approximately 95 tons of NO_x per year. A non-named source has a major source threshold of 250 tons per yea: or greater. Therefore, the existing installation would currently be classified as a minor source under the construction permits program.

PROJECT DESCRIPTION

WGPC Peculiar Compressor Station has applied for authority to convert two (2) 1,350 horsepower Cooper-Bessemer GMVA-10 reciprocating engine-compressors to two (2) 2,000 horsepower Cooper-Bessemer GMVH-10C2 reciprocating engine-compressors and install one (1) 1,535 horsepower (at ISO conditions) Solar Saturn 20-T1600 turbine ngine-compressor. The turbine can operate above its ISO-rated horsepower due to the effect of ambient conditions on turbine operation. At 0 °F (assumed minimum temperature), the turbine can develop 1,660 brake horsepower. The increased horsepower at the station will be used to provide natural gas delivery to the UtiliCorp-MEP Pleasant Hill electrical power plant facility located in Cass County. The facility will use pipeline-grade natural gas as its sole fuel source. The addition of the turbine, which were regulated under a NSPS standard since October 3, 1977, causes the proposed installation to be classified as a named source. A named source has a major source threshold of 100 tons per year or greater. WGPC Peculiar Compressor Station has voluntarily chosen to have this project limited to 98 tons of NO_x per year to avoid major source review. No air pollution control devices are proposed for this project, although the reciprocating engines are set up in lean burn mode.

The primary pollutant of concern for this project is NO_x, although CO and VOC emissions have also been evaluated and will be tested for in the performance test. WGPC Peculiar Compressor Station has proposed that it be allowed to limit engin loading and engine speed of the reciprocating engine-compressors when both reciprocating engine-compressors and the turbine engine-compressor are in operation and the installation's emissions are at a maximum. As shown in Attachment A, the engine loadings and engine speeds during these times are chosen as having relativ ly low NO_x emission characteristics based on engine manufacturer's emission data; however, this data must be verified in the required performance test. Similarly, even though the situation when all three compressor engines running simultaneously is expected to be the only operational mode that challenges the 98 ton per year NO_x limit of this permit, WGPC Peculiar Compressor Station must keep hourly records of engine operating conditions, to demonstrate compliance with this permit. The total installation will thereby be limited to less than 100 tons of NO_x per year as NO_x emissions from other existing equipment at this station are 1.4 tons per year.

EMISSIONS/CONTROLS EVALUATION

The emission factors used in this analysis were obtained from the equipment manufacturers' guaranteed performance data. WGPC Peculiar Compressor Station must conduct emission testing on the two (2) reciprocating engines and the turbin to verify the manufacturer's emission factors for NO_x, CO and VOC. Potential emissions of the application represent the potential of the new equipment, assuming continuous operation (i.e., 8760 hours per year). The following table provides an emissions summary for this project.

Table 1: Emissions Summary (tons per year)

PM_{10}	15.0	N/D	N/D	N/D	N/D
SOx	40.0	N/D	N/D	N/D	N/D
NO_x	40.0	95	0.31	133	98
VOC	40.0	43	0.32	23.6	23.6
CO	100.0	17	0.10	74.1	74.1
HAPs	10.0/25.0	7	N/D	6.0	6.0

Note 1: Existing potential emissions of NO_x, VOC and CO were calculated using emission test data for the 2-1350 hp reciprocating engine-compressors in their current configuration. HAP emissions from these engines are based on emission factors from AP-42. Emissions from other ancillary equipment (i e., boiler and emergency generator) are based on emission factors from AP-42.
Note 2: Existing actual emissions are taken directly from the 1999 EIQ.
Note 3: Potential emissions of the application are based on 2-2000 hp reciprocating engine-compressors and 1-1535 hp (at ISO conditions) turbine engine-compressor.
Note 4: NO_x potential emissions are conditioned from 133 to 98 tons per year, which is a reduction of approximately 26%.

PERMIT RULE APPLICABILITY

This review was conducted in accordance with Section (6) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. The installation is currently classified as a minor, non-named source with potential emissions of approximately 95 tons of NO_x per year, and will be classified as a minor, named source with potential emissions conditioned to approximately 98 tons of NO_x per year.

APPLICABLE REQUIREMENTS

I. WGPC Peculiar Compressor Station

A. General

1. *Submission of Emission Data, Emission Fees and Process Information,* 10 CSR 10-6.110
   a) Emission Limitation: $25.70 per ton of pollutant or the amount established by the Missouri Air Conservation Commission under Missouri Air Law 643.079(1) if changed.
   b) Record Keeping Requirement: Emission Inventory Questionnair (EIQ)
   c) Monitoring Requirement: None
   d) Reporting Requirement: April 1 for previous year's emissions (EIQ).
2. *Operating Permits*, 10 CSR 10-6.065
   a) Emission Limitation: As required by 10 CRS 10-6.065, *Operating Permits.*
   b) Record Keeping Requirement: As required by 10 CRS 10-6.065, *Operating Permits.*
   c) Monitoring Requirement: As required by 10 CRS 10-6.065, *Operating Permits.*
   d) Reporting Requirement: Submission of a revised Part 70 permit application within 12 months or an intermediate permit applicati n within 1 month.

B. Odors

1. *Restriction of Emission of Odors*, 10 CSR 10-2.070
   a) Emission Limitation: 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 (1) volume of odorous air is diluted with seven (7) volumes of odor-free air for two (2) separate trials not less than 15 minutes apart within th period of one (1) hour.
   b) Record Keeping Requirement: None
   c) Monitoring Requirement: None
   d) Reporting Requirement: None

C. Fugitive Particulate Matter

1. *Restriction of Particulate Matter to the Ambi nt Air Beyond the Premises of Origin*, 10 CSR 10-6.170

a) Emission Limitation: No person may 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 to go beyond the premises of origin in quantities that the particulate matter:
   (1) Remains visible in the ambient air beyond the property line of origin;
   (2) Or, may be found on surfaces beyond the property line of origin.

   The nature or origin of the particulate matter shall be determined by microscopy or other technique proven to be equally accurate and approved by the Director.
b) Record Keeping Requirement: DNR inspection reports
c) Monitoring Requirement: Periodic DNR inspection/routine surveillance.
d) Reporting Requirement: None

D. Visible Air Contaminants
   1. *Restriction of Emission of Visible Air Contaminants*, 10 CSR 10-6.220
      a) Emission Limitation: WGPC Peculiar Compressor Station shall not discharge into the ambient air from any single existing source of emission whatsoever any air contaminant of an opacity greater than 20%.
      b) Record Keeping Requirement: WGPC Peculiar Compressor Station shall maintain records of all opacity tests required by this condition for the time periods specified in 10 CSR 10-6.220, *Restriction of Emission of Visible Air Contaminants* and 10 CSR 10-6.065, *Operating Permits.*
      c) Monitoring Requirement: WGPC Peculiar Compressor Station shall conduct opacity measurements on these emission units using methods and timelines specified in 10 CSR 10-6.220, *Restriction of Emission of Visible Air Contaminants* and 10 CSR 10-6.065, *Operating Permits.*
      d) Reporting Requirement: WGPC Peculiar Compressor Station shall report to the APCP Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after any exceedance of the opacity limit, established by 10 CSR 10-6.220 and 10 CSR 10-6.065, or any malfunction which could possibly cause an opacity exceedance.

AMBIENT AIR QUALITY IMPACT ANALYSIS

Ambient air quality modeling was performed to determine the ambient impact of NO_x and CO from the project. No air quality model is currently available which can accurately predict ambient ozone concentrations caused by this installation's VOC emissions. There is no NAAQS for NO_x, but since NO_2 is a subgroup of NO_x, comparing NOx emissions against the NO_2 NAAQS standard is conservative.

NO_x	2.0	100	Annual
CO	13.5	10,000	8-hour
CO	19.2	40,000	Hour

The ambient air quality impact analysis indicates that the facility is well within compliance with NAAQS; therefore, no monitoring is warranted.

STAFF RECOMMENDATION

On the basis of this review conducted in accordance with Section (6), Missouri Stat Rule 10 CSR 10-6.060, *Construction Permits Required*, I recommend this permit be granted with special conditions.

Ken Volmert — 8 JUNE 2000

Ken Volmert, P.E. — Date
Environmental Engineer

PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated January 14, 2000, received January 26, 2000, designating WGPC Peculiar Compressor Station as the owner and operator of the installation.
- The certified letter to Ken Volmert, P.E./Missouri Department of Natural Resources from E.D. Mize/Williams Gas Pipeline – Central regarding Notice of Incomplete Application.
- U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition.
- Kansas City Regional Office Site Survey dated February 22, 2000.

Attachment A: NO_x Compliance Worksheet

Williams Gas Pipelines Central, Inc. - Peculiar Compressor Station
Cass County, S29&S32, T45N, 32W
Project Number: 2000-01-087, Installation ID Number: 037-0048
Permit Number: 072000-009

This sheet covers the period from _____ (month/day/year-time) to _____ (month/day/year-time).

Date [Column 1]	Hour [Column 2]	Speed (rpm) [Column 3]	Torque (%) [Column 4]	Speed (rpm) [Column 5]	Torque (%) [Column 6]	Horsepower (bhp) [Column 7]	Operating Mode [Column 8]

Column 1: Date of the measurements.
Column 2: Time of the measurements on the 24-hour clock (e.g., denote 1 a.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 (per Section 1.a of the permit) for the operating conditions at the time of the measurements.

	Speed in rpm				
Torque in %	280	290	300	316	330
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

CO	VOC	NO_x	CO	VOC
7.5	2.4	6.88	1.9	0.55

Notes:
1) These emission estimates are based on emission factors supplied by the engine manufacturers.
2) As discussed in Special Condition I.a, both reciprocating engines are required to operate below the dark line in this table when all three units are operating simultaneously.

HAPs

Project No.: 2000-01-067/Williams Gas Pipelines Central, Inc./Installation Unconditioned Potential Emissions after Project					NOx	VOC	CO		6/8/2000
E01	2000 HP Cooper-Beasemer GMVH-10C2 Reciprocating Engine/Compressor (serial #44102)	1.0	Emission Factors:		0.005875	0.00121	0.00375		0.00033
			Control Efficiency %:		0	0	0		0
					11.75	2.4	7.5		0.66
2000	bhp				51.5	10.6	32.9		2.9
E02	2000 HP Cooper-Beasemer GMVH-10C2 Reciprocating Engine/Compressor (serial #43841)	1.0	Emission Factors:		0.005875	0.00121	0.00375		0.00033
			Control Efficiency %:		0	0	0		0
					11.75	2.4	7.5		0.66
2000	bhp				51.5	10.6	32.9		2.9
E03	Emergency Standby Generator Operating at 500 hours instead of 8760	1.0	Emission Factors:		0.022	0.00031	0.019		0.00029
			Control Efficiency %:		0	0	0		0
					2.5	0.03	2.1		0.03
112	bhp				0.6	0.01	0.5		0.01
B01	Boiler	1.0	Emission Factors:		0.100	0.0055	0.0840		
			Control Efficiency %:		0	0	0		
					0.18	0.010	0.15		
1.8	MMbtu/hr				0.8	0.04	0.7		
E04	1535 HP Solar Saturn 20-T1600 Turbine Engine/Compressor	1.0	Emission Factors:		0.4380	0.0347	0.1210		0.0034
			Control Efficiency %:		0	0	0		0
					6.9	0.5	1.9		0.1
15.71	MMbtu/hr				30.1	2.4	8.3		0.2
		1.0	Emission Factors:						
			Control Efficiency %:						
		1.0	Emission Factors:						
			Control Efficiency %:						
		1.0	Emission Factors:						
			Control Efficiency %:						
Installation Total Controlled Emissions (lbs/hr):					0.0	0.0	33.0	5.4	19.2	0.0	1.4
Installation Total Controlled Emissions (tpy):					0	0	134	24	75	0	6

EMISSION FACTOR BASIS

Reciprocating Engines and Turbine Engine

NOx, VOC, CO emission factors taken from manufacturer's emission data

Formaldehyde emission factor from AP-42, Table 3.2-1 (2/97 Draft); 2-cycle, lean burn and AP-42, Table 3.1-3 (5/98 Draft), respectively

Emergency Generator

NOx, VOC, CO emission factors taken from AP-42, Table 3.2-1 (10/96); 4-cycle, rich burn

Formaldehyde emission factor from AP-42, Table 3.2-1 (2/97 Draft); 4-cycle, rich burn

Boiler

NOx, VOC, CO emission factors taken from AP-42, Section 1.4; boilers < 100 MMbtu/hr

Project No.: 2000-01-087/Williams Gas Pipelines Central, Inc./Existing Potential Emissions

6/8/2000

E01	1350 HP Cooper-Bessemer GMVA-10	1.0	Emission Factors:			0.01322	0.003104	0.001385		0.00058
	Reciprocating Engine/Compressor (serial #44102)		Control Efficiency %:			0	0	0		0
						17.8	4.2	1.9		0.8
						78.2	18.4	8.2		3.4
1350	bhp									
E02	1350 HP Cooper-Bessemer GMVA-10	1.0	Emission Factors:			0.002659	0.004237	0.001363		0.00058
	Reciprocating Engine/Compressor (serial #43841)		Control Efficiency %:			0	0	0		0
						3.6	5.7	1.8		0.8
						15.7	25.1	8.1		3.4
1350	bhp									
E03	Emergency Standby Generator	1.0	Emission Factors:			0.022	0.00031	0.019		0.00029
	Operating at 500 hours instead of 8760		Control Efficiency %:			0	0	0		0
						2.5	0.0	2.1		0.03
						0.6	0.01	0.5		0.01
112	bhp									
B01	Boiler	1.0	Emission Factors:			0.100	0.0055	0.0840		
			Control Efficiency %:			0	0	0		
						0.18	0.010	0.15		
						0.8	0.04	0.7		
1.8	MMbtu/hr									
		1.0	Emission Factors:							
			Control Efficiency %:							
		1.0	Emission Factors:							
			Control Efficiency %:							
		1.0	Emission Factors:							
			Control Efficiency %:							
		1.0	Emission Factors:							
			Control Efficiency %:							
Installation Total Controlled Emissions (lbs/hr):					0.0	0.0	24.1	10.0	6.0	0.0	1.6	
Installation Total Controlled Emissions (tpy):					0	0	95	43	17	0	7	

EMISSION FACTOR BASIS

Reciprocating Engines

NOx, VOC, CO emission factors taken from test data for these engines

Formaldehyde emission factor from AP-42, Table 3.2-1 (2/97 Draft); 2-cycle, lean burn

Emergency Generator

NOx, VOC, CO emission factors taken from AP-42, Table 3.2-1 (10/96); 4-cycle, rich burn

Formaldehyde emission factor from AP-42, Table 3.2-1 (2/97 Draft); 4-cycle, rich burn

Boiler

NOx, VOC, CO emission factors taken from AP-42, Section 1.4; boilers < 100 MMbtu/hr

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the matter of the Application of Aquila, Inc. for Permission and Approval and a Certificate of Public Convenience and Necessity authorizing it to acquire, construct, Install, own, operate, maintain, and otherwise Control and manage electrical production and Related facilities in unincorporated areas of Cass County, Missouri near the town of Peculiar.	)	Case No. EA-2006-0309

County of Jackson)
) ss
State of Missouri)

AFFIDAVIT OF BLOCK M. ANDREWS

Block M. Andrews, being first duly sworn, deposes and says that he is the witness who sponsors the accompanying testimony entitled "Surrebuttal Testimony of Block M. Andrews;" that said testimony was prepared by him and under his direction and supervision; that if inquiries were made as to the facts in said testimony and schedules, he would respond as therein set forth; and that the aforesaid testimony and schedules are true and correct to the best of his knowledge, information, and belief.

Block M Andrews
Block M. Andrews

Subscribed and sworn to before me this 18th day of April, 2006.

Terry D. Lutes
Notary Public
Terry D. Lutes

My Commission expires:

8-20-2008

Notary Public Notary Seal State of Missouri

TERRY D. LUTES
Jackson County
My Commission Expires
August 20, 2008