

OPC Data Request 8003

In Eric Bouselli's Direct Testimony on page 13, lines 10-11 he states that one of KC Water's objectives for the project is "complying with Federal, State, and Local regulations." Please provide a list of all violations or letters of warning received by KC Water - Blue River WWTP for any Federal, State and Local regulation. In addition, please describe the current compliance status with all regulations for which a violation or letter of warning was received and describe specifically how the RNG Project will ensure future or continued compliance.

Response:

Attachment EAB D-4 to Eric Bouselli's Direct Testimony contains a Letter of Support from KC Water. It references compliance items multiple times:

- "In 2023, the City received a notice of violation from the Missouri Department of Natural Resources for exceeding allowable sulfur dioxide (SO₂) emissions at the Blue River WWTP. Sulfur dioxide is formed from the combustion (i.e., flaring of) hydrogen sulfide that is inherent in the untreated biogas. The City does not currently have a hydrogen sulfide removal system in place. Spire's Biogas Project will remove hydrogen sulfide from the biogas as part of the treatment process assisting the City with re-establishing compliance with its air permit."
- "The Biogas Project supports the CPRP by:... Compliance with the Blue River WWTP's air permit... and ensuring overall compliance with National Pollutant Discharge Elimination System (NPDES) discharge and air emissions permits."

Some of this information may be available through publicly available websites such as the EPA's ECHO database and the Missouri Department of Natural Resources (MDNR) website.

Signed by: Eric Bouselli