



Kathleen Sebelius, Governor  
Roderick L. Bremby, Secretary

DEPARTMENT OF HEALTH  
AND ENVIRONMENT

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Division of Environment

## **AIR CONSTRUCTION REVISED PERMIT**

**Source ID No.:** 1190025

**Effective Date:** DRAFT

**Source Name:** Panhandle Eastern Pipe Line Company (PEPL)

**SIC Code:** 4922, Natural Gas Transmission

**NAICS Code:** 48621, Pipeline Transportation of Natural Gas

**Source Location:** Sec. 03, T 33S, R 28W  
Meade County, Kansas

**Mailing Address:** PO Box 4967  
Houston, TX 77210-4967

**Contact Person:** Marc Phillips, Principal Engineer  
Telephone No. (713) 989-7464

**This permit is issued pursuant to K.S.A. 65-3008 as amended; and consists of the conditions contained herein, the revised permit application dated January 15, 2008, the original Prevention of Significant Deterioration (PSD) permit issued December 11, 1980 by the U. S. Environmental Protection Agency (EPA) and all revisions. In the event that any conditions, requirements, or limitations contained herein is not in exact agreement with the permit application, or any of its revisions, the conditions, requirements, and/or limitation contained herein shall control.**

DIVISION OF ENVIRONMENT  
Bureau of Air & Radiation  
Air Construction/Operating Permits & Compliance Section  
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### **Description of Activity Subject to Air Pollution Control Regulations**

On December 11, 1980 EPA issued PEPL a PSD permit for the installation of five 3200 horsepower natural gas fired internal combustion reciprocating engines as part of their Borchers Storage Facility located in Meade County, Kansas. The PSD permit included emission limits and monitoring requirements on the five internal combustion engines. Monitoring requirements were based on a proposed New Source Performance Standard (NSPS) that was never finalized after the initial 1979 proposal. On January 18, 2008 EPA finalized NSPS for new engines. This permit is being issued to establish new monitoring requirements that will replace those established in the original PSD permit. No modifications are being made to the engines' emissions or rated capacity.

The initial installation of the five compressor engines constituted a major modification under Prevention of Significant Deterioration (PSD) [40 CFR 52.21, incorporated at K.A.R. 28-19-350]. This revision to the original PSD permit is intended to restate the original BACT requirements and revise monitoring and testing requirements.

### **Significant Applicable Air Regulations**

The project, as proposed, is subject to Kansas Administrative Regulations (K.A. R.) relating to air pollution control. The following air quality regulations were determined to be applicable to this source:

1. K.A.R. 28-19-350 Prevention of Significant Deterioration of Air Quality.
2. K.A.R. 28-19-650(a)(3) Emissions Opacity Limits.

### **Air Emission Unit Technical Specifications**

The following equipment was installed after the December 11, 1980 permit was issued:

1. Five (5) Clark (Model TLAD-8) 3,000 horsepower 2-cycle lean burn engines.  
The engines are natural gas fueled.

### **Air Emissions Estimates from the Proposed Activity**

No changes in emissions are expected to occur as a result of the permit revisions.

### **Air Emission Limitations**

1. The nitrogen oxides (NO<sub>x</sub>) emissions from the five Clark Model TLAD-8 engines are not to exceed the BACT limit of 850 parts per million (ppm) corrected to 15% oxygen (O<sub>2</sub>) on a dry basis.

### **Permit Conditions**

1. The owner or operator shall conduct a performance test and demonstrate compliance with the NO<sub>x</sub> BACT limit for each of the five Clark Model TLAD-8 engines within 365 days from the date this permit revision is issued. The 365 day performance testing window is provided due to seasonal use of engines. The testing shall use methods and other procedures specified in 40 CFR 60.4244, as applicable.
2. The owner or operator shall conduct subsequent performance testing to demonstrate compliance with the NO<sub>x</sub> BACT limit for each of the five Clark Model TLAD-8 engines. The testing shall be conducted within 3 months after every 8,760 hours of operation or within 3 months after every 3 years, whichever comes first. The testing shall use methods and other procedures specified in 40 CFR 60.4244, as applicable.
3. The owner or operator shall monitor each of the five Clark Model TLAD-8 engines on a quarterly basis with a portable analyzer to demonstrate compliance with the NO<sub>x</sub> BACT limit. Portable analyzer monitoring is not required for an engine during monitoring periods in which a performance test is conducted on that engine or during monitoring periods in which that engine is operated less than 876 hours. If the performance test and portable analyzer results demonstrate compliance for four consecutive monitoring or testing events, the portable analyzer monitoring shall be performed on a semi-annual basis. If the performance test and portable analyzer results demonstrate compliance for two consecutive semi-annual monitoring or testing events, the portable analyzer monitoring shall be performed on an annual basis. If the result of a semi-annual or annual monitoring or testing event fails to demonstrate compliance, quarterly monitoring shall be resumed, until the portable analyzer results demonstrate compliance for four consecutive monitoring or testing events.

The use of the Portable Combustion Gas Analyzer shall be in accordance with the Kansas Department of Health and Environment, Bureau of Air and Radiation Policy entitled “**Use of Portable Combustion Gas Analyzers for Periodic Monitoring**”.

4. Records of the dates, time and results of portable analyzer monitoring and performance tests will be maintained at the facility.

### **General Provisions**

1. This document shall become void if the construction or modification has not commenced within 18 months of the effective date, or if the construction or modification is interrupted for a period of 18 months or longer.
2. A construction permit or approval must be issued by KDHE prior to commencing any construction or modification of equipment or processes which results in a potential-to-emit increase equal to or greater than the thresholds specified at K.A.R. 28-19-300.
3. Upon presentation of credentials and other documents as may be required by law, representatives of the KDHE (including authorized contractors of the KDHE) shall be allowed by the permittee to:
  - (a) enter upon the premises where a regulated facility or activity is located or conducted or where records must be kept under conditions of this document;
  - (b) have access to and copies of, at reasonable times, any records that must be kept under conditions of this document;
  - (c) inspect, at reasonable times, any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this document; and
  - (d) sample or monitor, at reasonable times, for the purposes of assuring compliance with this document or as otherwise authorized by the Secretary of the KDHE, any substances or parameters at any location.
4. The emission unit or stationary source that is the subject of this document shall be operated in compliance with all applicable requirements of the Kansas Air Quality Act and the federal Clean Air Act.
5. This document is subject to periodic review and amending as deemed necessary to fulfill the intent and purpose of the Kansas Air Quality Statutes and Regulations.
6. This document does not relieve the permittee of the obligation to obtain other approvals, permits, licenses, or documents of sanction which may be required by other federal, state, or local agencies.
7. Issuance of this document does not relieve the owner or operator of any requirement to obtain an air quality operating permit under any applicable provision of K.A.R. 28-19-500.

**Permit Engineer**

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Ralph E. Walden, P.E.  
Environmental Engineer  
Bureau of Air and Radiation

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Date Signed

DSM:saw  
C-7724