



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 7

11201 Renner Boulevard
Lenexa, Kansas 66219

JAN 17 2013

Ms. Marian Massoth
Air Permitting Chief
Kansas Department of Health and Environment
1000 SW Jackson Suite 310
Topeka, KS 66612-1366

Dear Ms. Massoth:

We have reviewed the prevention of significant deterioration (PSD) permit for Mid-Kansas Electric Company's Rubart Station. After reviewing the draft permit, application and Permit Summary we have the following comments. We provide the comments to help ensure the project meets the federal Clean Air Act (CAA) requirements, that the permit will provide necessary information so that the basis for the decision is transparent and readily accessible to the public, and that the record provides adequate support for the permit decision.

- 1) The Permit Summary correctly states that since volatile organic compound (VOC) and nitrogen oxides (NO_x) emissions for the proposed project are significant that emissions for ozone are also considered significant. Table 1 in the Air Quality Impact Analysis Review also states that ozone exceeds the significant emission rate from NO_x and VOC. We were not able to find any information in the permit record on KDHE assessment whether or not the project would result in violations of the ozone National Ambient Air Quality Standards (NAAQS).
- 2) The draft permit has greenhouse gas best available control technology limits (BACT) of 10,692 lb/hour of carbon dioxide equivalents (CO₂e) that applies at all times except during startup and a 10,476 lb/hour CO₂e startup limit. Both BACT limits have an annual averaging period. The permit states that compliance with these BACT emission limits is established by performance testing. It seems unlikely that a performance test could be used to demonstrate compliance with an emissions limit with an annual average. We suggest changing the averaging period to a shorter period such as a 3-hour averaging period. The permit requires an initial performance test to verify compliance with the electric generating units' (EGU's) greenhouse gas BACT limits. We could not find any requirement to verify compliance with these BACT limits after the initial performance test. We suggest that the permit contain either monitoring or testing that would verify compliance with these BACT limits in the future. This would not necessarily need to be directly monitoring the greenhouse gases such as carbon dioxide (CO₂) emitted. Since the carbon emitted as carbon dioxide comes from the natural gas burned as fuel for the engines, one suggestion would be to monitor the fuel usage versus the amount of electricity generated by each EGU to assure the engines continue to operate efficiently and consistent with "good combustion practices" selected as BACT. We would suggest that KDHE consider a pound per megawatt hour or a fuel use per electricity output BACT limit.



- 3) Please verify that the greenhouse gas BACT limits for the engines in the permit are correct. Both the Permit Summary Sheet and the permit application have lower BACT limits.

Sincerely,



Mark A. Smith

Chief

Air Permitting and Compliance Branch