UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 7
11201 Renner Boulevard
Lenexa, Kansas 66219

NOV 02 2012

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 Next Generation Processing (NGP), LLC's Haven Gas Plant. 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 nitrogen oxides (NOx) emissions for the proposed project are significant that emissions for ozone are also considered significant. 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). Also, there is no discussion of ambient ozone air quality in the area as required by 40 C.F.R. 52.21(m) which the Kansas Department of Health and Environment (KDHE) has adopted by reference. Since the projects NOx emission increase is greater than 100 tons per year it does not meet the exemption in 40 C.F.R. 52.21(i)(5).

2) The permit sets Best Available Control Technology (BACT) limits for greenhouse gases in permit condition V.L. It is not clear what the averaging period for these limits is. The permit requires an initial performance test for the carbon dioxide (CO_2) limit for the combustion turbines, the reciprocating engines and the amine still vent in permit condition V.L 2 a. This makes us believe the averaging period for the CO_2 limit to be the length of the stack test. On the other hand, permit conditions V.L.2.e. and f. require 12-month rolling period calculations for the greenhouse gas limits for the natural gas-fired turbines and reciprocating engines in V.L.1.c. and for the amine still vent's CO_{2e} limit. We suggest the permit be clarified by including the averaging period for the limits.

3) The permit requires greenhouse gas emission calculations by permit conditions V.L.2.e. and f. We suggest the permit specify the calculation procedures.

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4) The permit has two typographic errors. Permit condition V.L.2.e. refers to V.K.1.c when it should refer to V.L.1.c. Permit condition III.C. refers to the reciprocating engines as turbines.

Sincerely,

Leslye Eubanks

for Mark A. Smith
Chief
Air Permitting and Compliance Branch