Notice is hereby given that the Kansas Department of Health and Environment (KDHE) is soliciting comments regarding a proposed air quality construction permit. Frontier El Dorado Refining LLC (FEDR), located at 1401 South Douglas Road, El Dorado, Kansas 67042, has applied for an air quality construction permit in accordance with the provisions of K.A.R. 28-19-300 to modify its refinery operations in order to meet the U.S. EPA Mobile Source Air Toxics Phase 2 (MSAT II) rule which limits the benzene content of gasoline produced in the U.S. to an annual refinery average of 0.62 percent by volume. FEDR’s proposal to meet the requirements of the federal MSAT II rule will be facilitated through the Naphtha Fractionation Project (NFP) which includes installation of a 20 MMscfd Hydrogen Generation Unit for providing additional high purity hydrogen and steam including a Pressure Swing Adsorption (PSA) purification unit, a 210 MMBTU/hr reformer furnace which will combust refinery fuel gas, natural gas, and PSA off-gas, and atmospheric and analyzer vents; a Crude Unit Stabilizer Column to replace the existing column; a Naphtha Fractionation Column to replace the Hydrotreating Unit #3 Naphtha Splitter Column, the Reformate Splitter Columns, and the Deisohexanizer; and process fugitive equipment associated with the project. The reformer furnace will utilize Selective Catalytic Reduction (SCR) technology which will include an SCR system, an aqueous ammonia storage tank, and process fugitive equipment. Existing equipment and/or processes affected by the NFP include a cooling tower, gasoline storage, and isomerate storage.

Emissions of oxides of nitrogen (NOx), sulfur dioxide (SO2), carbon monoxide (CO), particulate matter (PM), PM with an aerodynamic diameter less than or equal to 10 micrometers (PM10), PM with an aerodynamic diameter less than or equal to 2.5 micrometers (PM2.5), volatile organic compounds (VOC), hazardous air pollutants (HAPs), hydrogen sulfide (H2S), and greenhouse gas (GHG) were evaluated during the permit review process.
The proposed permit is to be issued in accordance with the provisions of K.A.R. 28-19-350, which adopts by reference the federal standards, procedures and requirements of 40 CFR 52.21, *Prevention of Significant Deterioration (PSD) of Air Quality*. These air quality regulations apply to major stationary sources and major modifications of major stationary sources located in areas designated as “attainment” or “unclassifiable” under the federal Clean Air Act (CAA). Attainment areas are areas where the air quality meets or is better than the national ambient air quality standards (NAAQS). Unclassifiable areas are areas where the air quality cannot be classified on the basis of available information as meeting or not meeting the NAAQS.

The PSD regulations require evaluation of emission reduction techniques to identify the best available control technology (BACT) for each regulated pollutant, including GHG, for which the emission rate exceeds the PSD significant level. The purpose of BACT is to affect the maximum degree of reduction achievable, taking into account energy, environmental, and economic impacts for each regulated pollutant under review. Evaluation of the estimated emissions for the proposed NFP project indicates that the emission rate of GHG exceeds the significant level. The department reviewed FEDR’s BACT analysis and concurs with its findings.

- GHG BACT for the reformer furnace associated with the Hydrogen Generation Unit is determined to be good combustion practices, energy efficient design, and combustion of refinery fuel gas and PSA off-gas.
- GHG BACT for the deaerator atmospheric vent is determined to be good design of the Hydrogen Generation Unit.
- GHG BACT for process fugitive equipment is determined to be a leak detection and repair program.

There are no NAAQS or PSD increments established for GHG. Consistent with the EPA Guidance Document “PSD and Title V Permitting Guidance for Greenhouse Gases” (March 2011), FEDR is not required to model for GHG or conduct any assessment of impacts of GHG in the context of the additional impacts.
analysis or Class I area provisions. The KDHE has determined that compliance with the BACT analysis is the best method which can be used at this time to satisfy the additional impacts analysis and Class I area requirements of the rules related to GHG.

A public comment period has been established to allow citizens the opportunity to express any concerns they may have regarding the proposed permitting action. The public comment period is to begin on October 10, 2013, and end on November 11, 2013 at noon. All comments should be submitted in writing to Rasha S. Allen, Bureau of Air, 1000 SW Jackson, Suite 310, Topeka, KS 66612-1366.

Any member of the public may request the Department to hold a public hearing to receive comments on the proposed issuance of the draft air quality construction permit. A written request to hold a public hearing should be sent to the attention of Rasha S. Allen at the address listed above or by FAX to (785) 291-3953, and must be received by noon on November 11, 2013. If a pertinent request is received, a public hearing is tentatively scheduled by the KDHE to be held at El Dorado Civic Center, 201 E. Central El Dorado, KS 67042 on November 14, 2013, beginning at 5:00 p.m. and continuing until audience members have an opportunity to submit comments. If no pertinent requests to hold the public hearing are received by noon November 11, 2013, the public hearing will be cancelled. A notice of the cancellation will be posted at the KDHE website at http://www.kdheks.gov/bar/publicnotice.html.

If a hearing is conducted, all interested parties will be given a reasonable opportunity to present their views orally or by submission of written materials during the hearing. In order to give all parties an opportunity to present their views, it may be necessary to request that each participant limit oral presentations to a specific time limit.

Any individual with a disability may request accommodation in order to participate in the public hearing and may request the proposed materials in an accessible format. Requests for accommodation must be made no later than November 1, 2013 by contacting Rasha S. Allen at (785) 296-1693.
A copy of the proposed permit, permit application, all supporting documentation, and all information relied upon during the permit application review process are available for public review for a period of 30 days from the date of publication during normal business hours (8:00 AM to 5:00 PM) at the KDHE, Bureau of Air, 1000 SW Jackson, Suite 310, Topeka, KS 66612-1366. A copy of the proposed permit and all supporting documentation can also be reviewed at the KDHE South Central District Office, 130 South Market, Suite 6050, Wichita, KS 67202-3802. To obtain or review the proposed permit and supporting documentation, contact Rasha S. Allen, (785) 296-1693, at the KDHE central office or the air program field staff, (316) 337-6042, at the KDHE South Central District Office. The standard departmental cost will be assessed for any copies requested.

These same materials are available, free of charge, at the KDHE Bureau of Air website, http://www.kdheks.gov/bar/index.html.

Robert Moser, MD, Secretary

Kansas Department of Health and Environment