



STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

Matt Blunt, Governor • Doyle Childers, Director

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AUG 19 2008

PERMIT BOOK

Mr. Marc Phillips
 Principal Engineer
 Panhandle Eastern Pipe Line Company
 5444 Westheimer Road
 Houston, TX 77056

RE: New Source Review Permit Application
 Installation ID: 019-0077, Expiration Date: July 1, 2009
 Temporary Permit Number:

082008-015

Dear Mr. Phillips:

The Missouri Department of Natural Resources' Air Pollution Control Program has completed a review of your August 7, 2008 request to operate two rental generators at the Centralia compressor station located at 16151 North Route Z in Centralia, Missouri. The Air Pollution Control Program is hereby granting your request to conduct this temporary operation according to Missouri State Rule 10 CSR 10-6.060(3), *Temporary Installation Permits*. Operation of the temporary generators at this site shall not go beyond July 1, 2009.

According to the information you provided in your letter dated August 6, 2008, two temporary generators are needed at the Centralia compressor station as part of an ongoing construction project to replace eight reciprocating gas engines with two low emission gas turbines. This construction project was granted permit 102007-011 on October 17, 2007. One of the temporary generators will be used for the purpose of providing electrical service to the station while the power from the local utility is unavailable. The second temporary generator will be used to provide back up service in the event of an emergency. Both generators are equipped with identical Caterpillar Model C27 diesel engines with a maximum brake horsepower of 1105 bhp.

The emission factors used in this analysis were obtained from the Environmental Protection Agency (EPA) document AP-42, *Compilation of Air Pollutant Emission Factors, Fifth Edition, Section 3.4, Large Stationary Diesel And All Stationary Dual-fuel Engines* (October 1996). The maximum hourly design rate for each engine was calculated to be 20.32 gallons of diesel fuel per hour. Continuous operation between August 15, 2008 and July 1, 2009 results in a maximum potential operating time of 7680 hours. Potential emissions were calculated assuming hours of operation to be 7,680 hours for one generator and a maximum of 500 hours for the emergency generator. Potential emissions for this project are summarized in Table 1 below.

Table 1: Potential Emissions Summary (tons)

PM ₁₀	SO _x	NO _x	VOC	CO	HAPs
0.65	0.57	36.43	0.93	9.68	0.02

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Given that the potential emissions are well below 100 tons, the request was made prior to the installation of the generators, and ambient air quality standards are expected to be maintained; the proposed temporary permit is granted according to provisions of Missouri State Rule 10 CSR 10-6.060(3). Subsequent notification should be made to the Air Pollution Control Program once the temporary generators are no longer located at the facility.

Please be aware that the 40 CFR Part 60 Subpart III of the New Source Performance Standards (NSPS), *Standards of Performance for Stationary Compression Ignition Internal Combustion Engines*, applies to the emergency generator engine. The NSPS only applies to the emergency generator engine as it is considered a stationary source. The NSPS does not apply to the other generator engine as it satisfies the requirements of EPA's definition of a mobile source.

You should also be aware that the Maximum Achievable Control Technology (MACT) standard, 40 CFR Part 63, Subpart ZZZZ, *National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Stationary Reciprocating Internal Combustion Engines*, applies to the emergency generator; however there are no requirements. The facility is not required to obtain an operating permit for this activity because the NSPS and the MACT that applies to the emergency generator does not require the facility to obtain an operating permit.

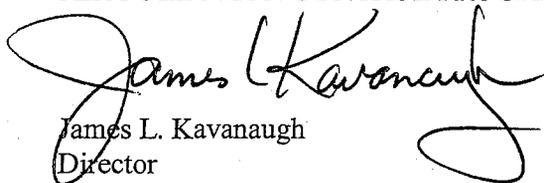
You are still obligated to meet all applicable air pollution control rules, Department of Natural Resources' rules, or any other applicable federal, state, or local agency regulations. Specifically, you should also avoid violating 10 CSR 10-6.170, *Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin*; 10 CSR 10-6.220, *Restriction of Emission of Visible Air Contaminants*; and 10 CSR 10-5.160, *Control of Odor in the Ambient Air*.

A copy of this letter should be kept with the unit or at the nearest manned facility and be made available to Department of Natural Resources' personnel upon verbal request.

If you have any questions regarding this permit, please do not hesitate to contact Kathi Jantz at the departments' Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102 or by telephone at (573) 751-4817. Thank you for your time and attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM


James L. Kavanaugh
Director

JLK:kjk

c: Mr. Steve Feeler, Compliance/Enforcement Section
Northeast Regional Office
PAMS File: 2008-08-016