

Panhandle Energy operates several pipeline systems and has begun to feel the effects of the recent NSPS rule promulgated by EPA. A chair of the INGAA subgroup representatives from Panhandle worked with both industry and US EPA to develop a rule that represented the current state of technology for gas fired IC Engines. However, that did not occur and gas fired IC Engine manufacturers, operators and state regulators are faced with a simple rule gone bad. Issues present in the final rule include :

- Attempts to merge on both local and state source regulations
- The regulation over reaching the current state of the technology
- A lack of understanding the state permit writers will require emissions testing of fired engine even though the federal NSPS standard does not
- **Reliance on VOC test methods that may not properly measure VOC's**
- Requirements for emergency equipment to use rely on catalysts to achieve emissions control requirements.