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JUL 19 1995

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COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF AIR QUALITY CONTROL

OPERATING PERMIT

In accordance with provisions of the Air Pollution Control Act, the Act of January 8, 1960, P.L. 2119, as amended, and after due consideration of an application received under Chapter 127 of the rules and regulations of the Department of Environmental Resources, the Department hereby issues this permit for the operation of the air contamination source(s) described below.

Permit No.:	<u>OP-18-0001</u>	Source &	<u>as described herein</u>
Owner:	<u>Columbia Gas Transmission</u> <u>Corporation</u>	Air	
Address:	<u>P.O. Box 1273</u> <u>Charleston, WV 25325-1273</u>	Cleaning	
Attn:	<u>Mr. P. Michael Hoffman,</u> <u>Environmental Engineer</u>	Device:	
		Location:	<u>Renovo Compressor Station</u> <u>Chapman Twp., Clinton County</u>

This permit is subject to the following conditions:

1. That the source(s) and any associated air cleaning device(s) are to be:
 - a. operated in such a manner as not to cause air pollution;
 - b. in compliance with the specifications and conditions of the applicable plan approval(s) issued;
 - c. operated and maintained in a manner consistent with good operating and maintenance practices.

2. This permit is valid only for the specific equipment, location and owner named above.

RECEIVED
Ozone Sources
EPA, REGION III

See attached for additional conditions.

Failure to comply with the conditions placed on this permit is a violation of Section 127.444. Violation of this or any other provision of Article III of the rules and regulations of the Department of Environmental Resources will result in suspension or revocation of this permit and/or prosecution under Section 9 of the Air Pollution Control Act.

Issued: JUL 18 1995

Expires: July 31, 2000



Environmental Program Manager

cc: Harrisburg
File
Hawk Run

PERMIT CONDITIONS

PERMIT NO.: OP-18-0001

COMPANY: Columbia Gas Transmission Corporation

3. This operating permit incorporates Reasonably Available Control Technology (RACT) determinations as required by provisions of Title I of the Clean Air Act Amendments and 25 PA Code Sections 129.91 through 129.95 for:

- 2 Waukesha model L3711GU 375 horsepower natural gas-fired reciprocating engines (engines #4 and 5).
- 125 horsepower LeRoi natural gas-fired auxiliary generator.
- 2 natural gas-fired heating system boilers (2.298 million BTU/hour total)
- 5 natural gas-fired catalytic heaters (.015 million BTU/hour total)
- 2 natural gas-fired water heaters (.08 million BTU/hour total)
- 4 natural gas-fired heaters (.525 million BTU/hour total)
- 1 natural gas-fired heater (.09 million BTU/hour)

This operating permit supersedes operating permit #18-399-004 and includes conditions previously contained in that operating permit.

4. The expiration date shown on this operating permit is for state purposes. For Federal enforcement purposes, the conditions of this operating permit which pertain to the implementation of the RACT regulations shall remain in effect as part of the State Implementation Plan (SIP) until replaced pursuant to 40 CFR 51.4 and approved by the U. S. Environmental Protection Agency (EPA). This operating permit shall become enforceable by the U. S. EPA upon its approval of the above as a revision to the SIP.
5. As per 25 PA Code Section 129.93(c), all of the sources identified in condition 3 above shall be maintained and operated in accordance with manufacturers' specifications and shall additionally be maintained and operated in accordance with good air pollution control practices. Additionally, the LeRoi auxiliary generator shall not be operated 500 or more hours in any consecutive 12 month period and the 2 Waukesha L3711GU engines shall have their timing retarded 4° relative to standard timing (and shall thereafter be consistently operated at 4° timing retard).
6. As per 25 PA Code Section 129.95, the company shall maintain records to demonstrate compliance with the requirements of 25 PA Code Sections 129.91 through 129.94. These records shall include the number of hours per calendar month that the auxiliary generator is operated.
7. The company shall demonstrate the timing of the Waukesha L3711GU engines to Department personnel upon request.

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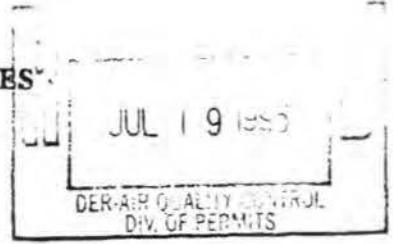
- ~~8. Nothing contained in this operating permit authorizes an extension of the May 31, 1995 RACT implementation date specified in Section 129.91(f) of Chapter 129 of Article III of the Rules and Regulations of the Department of Environmental Resources. If, however, it is ever determined that the Consent Decree executed between the Commonwealth of Pennsylvania Department of Environmental Resources and Columbia Gas Transmission Corporation (Consent Decree No. 259 M.D. 1995) authorizes an extension of this date for any air contamination source addressed herein, said extension shall automatically be considered a condition of this operating permit without the necessity of amendment.~~
9. If at any time the permittee causes, permits or allows any modification (as that term is defined in Chapter 121 of Title 25, the Rules and Regulations of the Department of Environmental Resources) of the aforementioned air contamination source(s), the operation and use of which is authorized by this permit, or causes, permits or allows any modifications, malfunction or removal of any air pollution control device required as a condition of this permit, then and in that event, this permit shall be suspended, and the permittee shall not thereafter continue to operate or use said air contamination source(s).
10. Only pipeline quality natural gas is to be used as fuel in the sources identified above.
11. The operation of these sources shall not at any time result in the emission of any air contaminant in excess of the limitations specified in, or established pursuant to, any applicable rule or regulation contained in Article III of the Rules and Regulations of the Department of Environmental Resources.
12. This operating permit is valid for a limited period of time and may be renewed before its expiration. Requests for an operating permit renewal must be in writing and must be accompanied by the appropriate permit application processing and annual permit administration fees as specified in Section 127.703 of the Rules and Regulations of the Department of Environmental Resources. These fees shall be paid in the form of a check payable to the "Commonwealth of Pennsylvania - Clean Air Fund". The request should be made using the appropriate application form and must be received by the Department along with a completed Air Pollution Control Act Compliance Review form no later than July 1, 2000.

An annual operating permit administration fee is also due pursuant to Section 127.703 no later than 7/31/96, 7/31/97, 7/31/98 and 7/31/99. The administration fee is to be submitted with an Annual Operating Permit Administration Fee Transmittal form.

All necessary forms can be obtained from the Department upon request.

13. Any notification required as a result of any condition herein should be directed to: Rhett McLaren, Air Quality Specialist, P.O. Box 209, Hawk Run, PA 16840, telephone (814) 342-0410.

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF AIR QUALITY



PLAN APPROVAL

Plan Approval No.:	<u>PA-18-0001</u>	Source &	<u>3 Cooper Bessemer model</u>
Owner:	<u>Columbia Gas Transmission Corporation</u>	Air	<u>GMV-8TF 880 horsepower</u>
		Cleaning	<u>natural gas-fired reciprocating</u>
Address:	<u>P.O. Box 1273</u>	Device:	<u>engines</u>
	<u>Charleston, WV 25325-1273</u>		
Attn:	<u>Mr. P. Michael Hoffman</u>	Location:	<u>Renovo Compressor Station</u>
	<u>Environmental Engineer</u>		<u>Chapman Twp., Clinton County</u>


In accordance with provisions of the Air Pollution Control Act, the Act of January 8, 1960, P.L. 2119, as amended, and with Chapter 127 of the rules and regulations of the Department of Environmental Resources, the Department on JUL 18 1995 approved plans for the installation of air cleaning devices on the above indicated air contamination source and for the implementation of Reasonably Available Control Technology (RACT) requirements.

This **PLAN APPROVAL** expires 1/31/97.

The plan approval is subject to the following conditions:

- (1) The air cleaning devices are to be installed and RACT is to be implemented in accordance with the plans submitted with the application (as approved herein).
- (2) Upon completion of air cleaning device installation and the implementation of RACT control measures, an operating permit must be obtained.

See attached for additional conditions.



Environmental Program Manager
Air Quality Program
Northcentral Region

cc: Harrisburg
File
Hawk Run

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3. This plan approval includes a nitrogen oxides (NOx) Reasonably Available Control Technology (RACT) determination as required by the Title I provisions of the Clean Air Act Amendments and the RACT requirements of Sections 129.91 through 129.95 of Chapter 129 of Article III of the Rules and Regulations of the Department of Environmental Resources for three 880 horsepower Cooper Bessemer GMV-8TF natural gas-fired reciprocating engines (Units #1, 2 and 3).
4. This plan approval is issued for the installation of Cooper cleanburn combustion conversion kits on the 3 engines listed in condition 3 above.

This plan approval is also issued for the modification of the respective engines, said modification consisting of a 30.59 ton per year increase in the engines' potential to emit carbon monoxide (CO) such that the 3 engines will now have a combined potential to emit 50.98 tons of carbon monoxide per year as well as a 10.2 ton per year increase in the engines' potential to emit volatile organic compounds such that the 3 engines will now have a combined potential to emit 25.5 tons of volatile organic compounds per year. These increases will occur as a result of the installation of the cleanburn combustion conversion kits on the engines.

5. Following the installation of the cleanburn combustion conversion kits, the nitrogen oxides (NOx) emissions from each of the engines shall not exceed 2.0 grams/horsepower-hour at full load full speed operating conditions and 4.0 grams/horsepower-hour at any time under any operating conditions.
6. Pursuant to the Consent Decree executed between the Commonwealth of Pennsylvania Department of Environmental Resources and Columbia Gas Transmission Corporation (Consent Decree No. 259 M.D. 1995), the installation of the cleanburn combustion conversion kits on the 3 Cooper Bessemer GMV-8TF engines shall be completed no later than 46 weeks from the date of plan approval issuance.
7. The 3 Cooper Bessemer GMV-8TF engines shall be stack tested for NOx, CO and VOC as soon as practical following the completion of the cleanburn combustion conversion kit installations but, in no case, more than 180 days following completion of the installations. These tests shall be performed using test procedures which are acceptable to the Department while the engines are operating at maximum capacity.
8. At least 60 days prior to conducting the testing required by condition 7 herein, the company shall submit to the Department a pretest plan which describes the testing procedures to be used. The plan shall include a dimensioned sketch of the engine stacks showing the proposed locations of the sampling ports.
9. The Department shall be given at least ten days advance notice of the date(s) upon which the testing required by condition 7 herein is to be performed so that Department personnel may make arrangements to observe the testing. The Department is under no obligation to accept the results of

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any testing performed without the opportunity for test observation having been provided to Department personnel.

10. Within 60 days of performing the testing required by condition 7 herein, the company shall submit to the Department two copies of a test report which includes a copy of the test results, a description of the engine operating parameters existing during each test, a description of the testing and analytical procedures actually used for the performance of the tests, a copy of all raw data generated and a copy of all associated calculations.
11. The Department reserves the right to require additional stack testing upon the respective engines while the engines are operating at conditions other than at maximum capacity. The Department additionally reserves the right to establish periodic retesting as a condition of any future operating permit issued for the respective engines.
12. Issuance of an operating permit for the aforementioned sources is contingent upon the aforementioned air cleaning devices being installed, and the sources and air cleaning devices being maintained and operated, as described in the application and supplemental materials submitted for plan approval as well as in accordance with all conditions contained herein and upon satisfactory demonstration that any air contaminants emitted from the sources are in compliance with the requirements specified in all conditions contained herein as well as the requirements specified in, or established pursuant to, any applicable rule or regulation contained in Article III of the Rules and Regulations of the Department of Environmental Resources.
13. The company shall immediately notify the Department of any malfunction of the source(s) or associated air cleaning device(s) which results in, or may possibly be resulting in, the emission of air contaminants in excess of the limitations specified in any condition contained herein or specified in, or established pursuant to, any applicable rule or regulation contained in Article III of the Rules and Regulations of the Department of Environmental Resources.
14. This Plan Approval authorizes temporary operation of the source(s) covered by this Plan Approval provided the following conditions are met.
 - (a) The Department must receive written notice from the Owner/Operator of the completion of construction and the Operator's intent to commence operation at least five (5) working days prior to the completion of construction. The notice should state when construction will be completed and when Operator expects to commence operation.
 - (b) Operation is authorized only to facilitate the start-up and shake-down of sources and air cleaning devices, to permit operations pending the issuance of an Operating Permit or to permit the evaluation of the source(s) for compliance with all applicable regulations and requirements.

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- (c) This condition authorizes temporary operation of the source(s) for a period of 180 days from the date of commencement of operation, provided the Department receives notice from the Owner/Operator pursuant to subpart (a), above.
 - (d) The Owner/Operator may request an extension if compliance with all applicable regulations and Plan Approval requirements has not been established. The extension request shall be submitted in writing at least 15 days prior to the end of this period of temporary operation and shall provide a description of the compliance status of the source, a detailed schedule for establishing compliance, and the reasons compliance has not been established.
 - (e) The notice submitted by the Owner/Operator pursuant to subpart (a), above, prior to the expiration of this Plan Approval, shall modify the plan approval expiration date. The new plan approval expiration date shall be 180 days from the date of the written notice.
15. Any notification required as a result of any condition herein should be directed to: Richard L. Maxwell, Jr., Chief, Engineering Services, 200 Pine Street, Williamsport, PA 17701-6510, telephone (717) 327-3640.