### COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION SOUTHWEST REGION - FIELD OPERATIONS AIR QUALITY 400 WATERFRONT DRIVE PITTSBURGH, PENNSYLVANIA 15222-4745

# RACT OPERATING PERMIT

In accordance with provisions of the Air Pollution Control 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 Protection, the Department hereby issues this permit for the operation of the air contamination source described below.

Permit No.: 65-000-840

Source : Internal Combustion Engines

Owner : CNG Transmission Corporation Address : 445 West Main Street P.O. Box 2450 Clarksburg, WV 26302 Plant : South Oakford Station

Attention : Sean R. Sleigh

Plant : South Oakford Station Location : Hempfield Township County : Westmoreland County

This permit is subject to the following conditions:

(1) That the source and any associated air cleaning devices are to be:

(a) operated in such a manner as not to cause air pollution;

(b) operated and maintained in a manner consistent with good operating and management practices.

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

(3) See attached.

Failure to comply with the conditions placed on this permit is a violation of section 127.25. Violation of this or any other provision of Article III of the Rules and Regulations of the Department of Environmental Protection will result in suspension or revocation of this permit and/or prosecution under Section 9 of the Air Pollution Control Act.

Issued: 10/13/95

Joseph P. Pezze Regional Air Quality Manager Southwest Region

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#### Special Conditions

- 3. This RACT Operating Permit approves the Reasonably Available Control Technology (RACT) proposal submitted by Consolidated Natural Gas Transmission (CNGT) Corporation for the installation of INOx plasma ignition systems on two (2) Cooper 14W-330 internal combustion engines at the South Oakford compressor station in Hempfield Township, Westmoreland County.
- 5. Emission limits for the engines at this facility are as follows:

		N	NOx.		CO	NMVOC		
	Source	lbs/hr	t/y	lbs/hr	t/Y	lbs/hr	t/y	
(2)	Cooper 14W-330	125.99	551.8	56.0	245.3	28.0	122.6	
(1)	Waukesha L-5790-550	18.87	82.6		241			

- The Department may revise the emission limits established above based on actual emission rates.
- 7. The following sources will implement presumptive RACT in accordance with 25 Pa. Code Section 129.93:

Source		Ra	Rating		Applicable Presumptive RACT Emission Limitation					
(1) BS&B 62 (1) Ajax WC			MMBTU/hr MMBTU/hr				Section Section		A CONTRACTOR OF	

- 8. For those sources specified in Condition 7 which CNGT has elected to utilize presumptive technology provided for in 25 Pa. Code 129.93, CNGT shall operate and maintain the source in accordance with good air pollution control practices.
- 9. A minimum of one (1) stack test in accordance with 25 PA Code Chapter 139 and the Department's Source Testing Manual shall be performed on all engines during the 5 year Operating Permit to verify the emission rates for NOx (as NO2), CO, and NMVOC. Testing shall be conducted while engines are operating at full load, full speed during the ozone season (April to October).

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### Special Conditions

- 10. All engines operating 750 hours or more during the preceding ozone season shall be stack tested semi-annually to verify the rates of NOx (as NO2), CO, and NMVOC through either an EPA Method stack test or through the use of portable monitors.
- All engines operating less than 750 hours during the preceding ozone season shall be stack tested annually to verify the rates of NOx (as N02), CO, and NMVOC through either an EPA Method stack test or through the use of portable monitors.
- 12. For those tests utilizing portable monitors, the company shall submit a complete operating procedure including calibration, QA/QC, and emissions calculation methods to the Department at least 60 days prior to the stack test specified in Condition 9, above. The accuracy of the portable analyzer readings shall be verified by operation and recording of readings during the EPA method stack testing of Condition 9. Results from stack tests using portable analyzers shall be retained by the company at the test location and provided annually with the emission statements and at other times as requested by the Department.
  - CNGT shall submit a pretest protocol for review at least 60 days prior to performance of the stack tests.
- 14. The Department shall be notified at least two weeks in advance of the date and time of the stack test so that an observer may be present.
- 15. Two copies of the stack test results shall be supplied to the Department for review within sixty (60) days of completion of testing.
- 16. CNGT shall maintain records in accordance with the recordkeeping requirements of 25 Pa. Code Section 129.95. At a minimum, the following records shall be kept for each engine: operating hours, daily fuel consumption, operating pressures, operating temperatures. These records shall be maintained on file at the facility for not less than two years and shall be made available to the Department upon request.

18. The RACT requirements shall be implemented as expeditious as practicable but no later than May 31, 1996.