

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF AIR QUALITY

V-201  
N-200

91P

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 Protection, the Department hereby issues this permit for the operation of the air contamination source(s) described below.

Permit No.:	<u>OP-53-0004</u>	Source &	<u>engines, heaters, etc., as</u>
Owner:	<u>CNG Transmission Corporation</u>	Air	<u>described herein</u>
		Cleaning	
Address:	<u>445 West Main Street</u>	Device:	
	<u>Clarksburg, WV 26301-2450</u>		
Attn:	<u>Sean R. Sleight</u>	Location:	<u>Ellisburg Compressor Station</u>
			<u>Genesee Township</u>
			<u>Potter 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.

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 Protection will result in suspension or revocation of this permit and/or prosecution under Section 9 of the Air Pollution Control Act.

Issued: FEB 29 1996

~~Expires: February 28, 2001~~

  
Environmental Program Manager

cc: Harrisburg  
File *pr*  
Mansfield Office

RECEIVED  
Ozone/Co & Molten  
Section (S...)

APR 19 1996

EPA, REGION III

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3. This operating permit incorporates Reasonably Available Control Technology (RACT) determinations as required by Title I provisions of the Clean Air Act Amendments and 25 PA Code 129.91 through 129.95 for two 1100 horsepower Clark HBA-5 natural gas-fired reciprocating internal combustion engines, two 544 horsepower Ingersoll Rand PSVG natural gas-fired reciprocating internal combustion engine/generators, one 25 horsepower Wisconsin VA61D natural gas-fired air compressor, one 4.19 million BTU/hour Cyclotherm CW44WAN43 natural gas-fired boiler, one .5 million BTU/hour Pennco 41-525S natural gas-fired boiler, four 24.5 million BTU/hour Natco natural gas-fired heaters, two 11 million BTU/hour Natco natural gas-fired saltbath heaters, seven .32 million BTU/hour Trane natural gas-fired heaters, one 30 horsepower Wisconsin VG4D natural gas-fired water pump, an emergency natural gas blowdown, 2 hot water heaters, 2 space heaters, 13 engine/compressor transition section vents, 10 storage tanks (not including two 10,000 gallon drip gasoline storage tanks subject to Section 129.57 of the Department's Rules and Regulations), 21 fuel gas, crankcase, turbine housing and cooling water tank vents and various fugitive emission sources.
4. The expiration date shown in 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 and approved by the U.S. Environmental Protection Agency (EPA). The operating permit shall become enforceable by the U.S. EPA upon its approval of the above as a revision to the SIP.
5. Pursuant to the RACT provisions of Sections 129.91 through 129.95 of Chapter 129 of Article III of the Rules and Regulations of the Department of Environmental Protection, the 2 Clark HBA-5 engines and the 2 Ingersoll Rand PSVG engine/generators shall have their ignition retarded 4° relative to standard timing. Additionally, the nitrogen oxides (NO<sub>x</sub>, expressed as NO<sub>2</sub>) and volatile organic compound emissions from each of the Clark HBA-5 engines shall not exceed 58.9 pounds per hour and 1.33 pounds per hour, respectively, following ignition retard and the nitrogen oxides (NO<sub>x</sub>, expressed as NO<sub>2</sub>) and volatile organic compound emissions from each of the Ingersoll Rand PSVG engine/generators shall not exceed 17.25 pounds per hour and .33 pounds per hour, respectively, following ignition retard.
6. Completion of ignition retard and the implementation of RACT on the 2 Clark HBA-5 engines and the 2 Ingersoll Rand PSVG engine/generators identified in condition 3 herein shall proceed as expeditiously as practicable but shall not exceed one month beyond the date of operating permit issuance. This extension beyond the May 31, 1995 RACT compliance date specified in Section 129.91 of Chapter 129 of Article III of the Rules and Regulations of the Department of Environmental Protection is contingent upon compliance with the terms and conditions of compliance permit CP-53-0004A.

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7. Pursuant to the presumptive RACT provisions of Sections 129.93(c)(5) of Chapter 129 of Article III of the Rules and Regulations of the Department of Environmental Protection, neither the Wisconsin VA61D air compressor or the Wisconsin VG4D water pump shall be operated 500 or more hours in any consecutive 12 month period. Additionally, both shall be maintained and operated in accordance with manufacturers' specifications as well as in accordance with good air pollution control practices. Compliance with these requirements shall also constitute RACT for the volatile organic compound emissions from the respective compressor and water pump.
8. Pursuant to the presumptive RACT provisions of Sections 129.93(b)(2), (3), (4) and (5) of Article III of the Rules and Regulations of the Department of Environmental Protection, CNG shall comply with the annual tune-up, maintenance, operating and recordkeeping requirements specified in those sections with respect to the four 24.5 million BTU/hour Natco heaters identified in condition 3 herein. The first annual tune-up on these heaters shall be performed no later than 180 days following the issuance of this operating permit.
9. Pursuant to the presumptive RACT provisions of Section 129.93(c) of Chapter 129 of Article III of the Rules and Regulations of the Department of Environmental Protection, the 4.19 million BTU/hour Cyclotherm boiler, the .5 million BTU/hour Pennco boiler, the two 11 million BTU/hour Natco saltbath heaters, the seven .32 million BTU/hour Trane heaters, the 2 hot water heaters and the 2 space heaters identified in condition 3 herein shall be maintained and operated in accordance with manufacturers' specifications as well as in accordance with good air pollution control practices.
10. The potential to emit volatile organic compounds from each of the following source categories shall never exceed 3 pounds per hour, 15 pounds per day or 2.7 tons per year (as determined by the Department). Should any of these limitations ever be exceeded for any of the source categories listed below, a detailed RACT analysis which meets the criteria specified in Section 129.92 of Chapter 129 of Article III of the Rules and Regulations of the Department of Environmental Protection must be submitted to the Department for each source contained in the respective source category.
  - a. the four 24.5 million BTU/hour Natco heaters, the 4.19 million BTU/hour Cyclotherm boiler, the .5 million BTU/hour Pennco boiler, the two 11 million BTU/hour Natco saltbath heaters, the seven .32 million BTU/hour Trane heaters, the two hot water heaters and the two space heaters.
  - b. emergency natural gas blowdown
  - c. 10 storage tanks (not including two 10,000 gallon drip gasoline storage tanks)
  - d. 21 fuel gas, crankcase, turbine housing and cooling water tank vents

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11. Pursuant to the RACT provisions of Sections 129.91-129.95 of Chapter 129 of Article III of the Rules and Regulations of the Department of Environmental Protection, the volatile organic compound emissions from the 13 engine/compressor transition section vents shall never exceed 3.5 tons per year.
12. Pursuant to the RACT provisions of Sections 129.91 through 129.95 of Chapter 129 of Article III of the Rules and Regulations of the Department of Environmental Protection, the volatile organic compound emissions from all fugitive emission sources at this facility shall never exceed 7.9 tons per year.
13. By no later than May 31, 1996, and additionally sometime during the interval beginning 2.5 years after the issuance of an operating permit for the respective engines and ending 4.5 years after said issuance, the company shall perform stack testing upon each of the 2 Clark HBA-5 engines identified in condition 3 herein for nitrogen oxides (NO<sub>x</sub>, expressed as NO<sub>2</sub>), carbon monoxide, volatile organic compounds and non-methane hydrocarbons using reference method test procedures acceptable to the Department. All testing is to be performed while the respective engines are operating at full load and full speed and the ignition timing must be monitored during all tests.
14. If, at any time, either of the 2 Ingersoll Rand PSVG engine/generators identified in condition 3 herein is determined to have operated 500 or more hours in any consecutive 12 month period, the respective engine/generator shall be stack tested for nitrogen oxides (NO<sub>x</sub>, expressed as NO<sub>2</sub>), carbon monoxide, volatile organic compounds and non-methane hydrocarbons within 120 days of said determination. All such testing shall be performed using reference method test procedures while the respective engine/generator is operating at rated capacity. Additionally, the ignition timing of the engine/generator shall be monitored during all tests.
15. At least 60 days prior to the performance of any testing required by conditions 13 and 14 herein, a pretest plan shall be submitted to the Department for evaluation. This test plan shall contain the specific testing and analytical procedures to be used in performing the testing.
16. The Department shall be given at least 14 days advance notice of the specific dates and times for the performance of any testing required by conditions 13 and 14 herein in order that Department personnel can arrange to be present. The Department is under no obligation to accept the results of any testing performed without adequate advance notice having been given to the Department.
17. Within 60 days of completion of any testing required by conditions 13 and 14 herein, two copies of the test report shall be submitted to the Department for the respective engines identified in condition 2 herein. The report shall contain the results of the testing reported above in pounds per hour, a description of the testing and analytical procedures actually used, all engine or engine/generator operating data collected during the tests including ignition timing data, a copy of all raw data and a copy of the calculations generated during data analysis. For the Clark HBA-5 engines, the test report shall specifically identify the horsepower at which each engine was operating during each of the test

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runs or, alternately, shall provide an acceptable demonstration that the engines were operated at fully load/full speed conditions during the testing.

18. In addition to the testing required by condition 13 herein, the company shall perform semi-annual NOx tests upon each of the Clark HBA-5 engines using a portable exhaust gas analyzer which has been approved by the Department. The first such testing shall occur no more than six months after the testing required by condition 13 herein. The reference method retesting required by condition 13 herein may be substituted for the portable analyzer testing required by this condition on a one-for-one basis (one occurrence of reference method testing may be substituted for one of the every-6-months occurrences of portable analyzer testing).
19. The company shall submit specifications to the Department for the portable exhaust gas analyzer it proposes to use to comply with condition 18 herein by no later than 90 days after the initial testing required by condition 13 herein.
20. The results of all testing performed pursuant to condition 18 herein shall be submitted to the Department within 30 days of test performance.
21. In addition to the testing required by conditions 13, 14 and 18 herein, the Department reserves the right to require such additional testing upon the Clark HBA-5 engines, or any other source identified herein, as it may reasonably prescribe pursuant to the provisions of Section 4 of the Pennsylvania Air Pollution Control Act, the Act of January 8, 1960, P.L. 2119 (1959), as amended, and as it may deem necessary to determine compliance with any condition contained herein.
22. The company shall maintain records in accordance with the recordkeeping requirements of 25 Pa. Code Section 129.95 which, at a minimum, shall include:
  - The number of hours per calendar year that each of the Clark HBA-5 engines is operated.
  - The amount of fuel used per calendar year in each of the Clark HBA-5 engines.
  - The number of hours per month that each of the Ingersoll Rand PSVG engine/generators is operated.
  - The number of hours per year that each of the 24.5 million BTU/hour Natco heaters is operated.
  - The information required for the 24.5 million BTU/hour Natco heaters by Section 129.93(b)(3) of Chapter 129 of Article III of the Rules and Regulations of the Department of Environmental Protection and condition 8 herein.

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- The number of hours per year that each of the 11 million BTU/hour Natco saltbath heaters is operated.
- The total combined amount of fuel used per calendar year in the four 24.5 million BTU/hour Natco heaters, the 4.19 million BTU/hour Cyclotherm boiler, the .5 million Pennco boiler, the two 11 million BTU/hour Natco saltbath heaters, the seven .32 million BTU/hour Trane heaters, the two hot water heaters and the two space heaters.

These records shall be retained for a minimum of 2 years and shall be made available to the Department upon request. The Department reserves the right to expand the list contained in this condition as it may reasonably prescribe pursuant to the provisions of Section 4 of the Pennsylvania Air Pollution Control Act, Act of January 8, 1960, P.L. 2119 (1959), as amended, and as it may deem necessary to determine compliance with any condition contained herein or any applicable requirement specified in Sections 129.91 through 129.95 of Chapter 129 of Article III of the Rules and Regulations of the Department of Environmental Protection.

23. All fuel burning sources identified in condition 3 herein shall only be fired on pipeline quality natural gas.

*Conditions 24 and 25 herein pertain to sources previously operated pursuant to operating permit 53-302-007.*

24. This operating permit supersedes all previously issued operating permits and temporary operating permits bearing the number 53-302-007.
25. The four 24.5 million BTU/hour Natco heaters are subject to Subpart Dc of the Federal Standards of Performance for New Stationary Sources, 40 CFR 60.40c-60.48c. The company shall comply with all applicable requirements of this Subpart as well as any other applicable Subpart of the Standards of Performance, including any recordkeeping and reporting requirements. Pursuant to 40 CFR 60.4 of the Standards of Performance, the submission of all requests, reports, applications, submittals and other communications required by the Standards of Performance must be made to both the Department of Environmental Protection and the Environmental Protection Agency. The Environmental Protection Agency copies may be sent to:

Director  
Air, Toxics and Radiation Division  
U.S. EPA, Region III  
841 Chestnut Street  
Philadelphia, PA 19107

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26. The operation of the air contamination sources identified in condition 3 herein shall not at any time result 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 Protection.
27. 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, or established pursuant to, any applicable rule or regulation contained in Article III of the Rules and Regulations of the Department of Environmental Protection.
28. 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 February 1, 2001.

Additional annual operating permit administration fees may also be required pursuant to Section 127.703. If required, these fees are to be paid by no later than February 28, 1997, February 28, 1998, February 28, 1999 and February 29, 2000. 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.

29. Any notification required as a result of any condition herein should be directed to: Steven Schulte, Air Quality Specialist, 105 Sherwood Street, Mansfield, PA 16933, telephone (717) 662-4066.

