

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

1.201
10-200

S.P

OPERATING PERMIT

P70 12-13

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.:	OP-53-0008	Source &	4 natural gas-fired reciprocating
Owner:	CNG Transmission Corp.	Air	engines and associated
		Cleaning	equipment
Address:	P. O. Box 2450	Device:	
	Clarksburg, WV 26302-2450		
Attn:	Sean Sleight, Engineer	Location:	State Line Station
	Environmental Services		Genesee Township
			Potter County

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: JAN 10 1996

Expires: ~~January 31, 2001~~


Environmental Program Manager

cc: Harrisburg
File
Mansfield

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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 Sections 129.91 through 129.95 for the following:
- a) three 1100 horsepower Ingersoll Rand KVG-104 natural gas fired reciprocating engines
 - b) one 1350 horsepower Cooper Bessemer GMVR-6 natural gas fired reciprocating engine
 - c) one Natco 5GR-250SX3/G .125 million BTU/hour natural gas-fired gas dehydration glycol recovery system reboiler
 - d) one Natco 36" OD x 12' .750 million BTU/hour natural gas-fired heater
 - e) one Natco T7219701-01 3.0 million BTU/hour natural gas-fired heater
 - f) One Cleaver Brooks CB-700-100 4.18 million BTU/hour natural gas-fired boiler
 - g) one 400 horsepower Caterpillar 3408B-SI natural gas-fired auxiliary generator
 - h) one Natco N12C46901 7.0 million BTU/hour natural gas-fired heater
 - i) two hot water heaters
 - j) four space heaters
 - k) four engine/compressor transition vents
 - l) one emergency natural gas blowdown
 - m) four storage tanks (not including a 10,000 gallon dehydration distillate storage tank subject to Section 129.57 of the Department's Rules and Regulations).
 - n) four fuel gas vents, four crankcase vents, four turbine housing vents and one cooling water tank vent
 - o) various fugitive emission sources
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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 3 Ingersoll Rand KVG-104 engines and the Cooper Bessemer GMVR-6 engine shall comply with the nitrogen oxides and nonmethane hydrocarbon emission limits specified in condition 22 herein.
6. Pursuant to the presumptive provisions of Section 129.93(c) of Chapter 129 of Article III of the Rules and Regulations of the Department of Environmental Protection, the Natco 5GR-250SX/G gas dehydration system reboiler, the Natco 36" OD x 12' heater, the Natco T7219701-01 heater, the Cleaver Brooks CB-700-100 boiler, the Natco N12C46901 heater, the two hot water heaters and the four space heaters identified in condition 3 herein shall be maintained and operated in accordance with manufacturer's specifications and, additionally, in accordance with good air pollution control practices.
7. Pursuant to the presumptive provisions of Section 129.93(c)(3) of Chapter 129 of Article III of the Rules and Regulations of the Department of Environmental Protection, the Caterpillar 3408B-SI auxiliary generator identified in condition 3 herein shall be maintained and operated in accordance with manufacturer's specifications and, additionally, in accordance with good air pollution control practices. The generator shall also be set and maintained 4° retarded relative to standard timing. Compliance with these requirements shall not only be considered NOx RACT but VOC RACT as well.
8. 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 Natco 5GR-250SX3/G .125 million BTU/hour dehydration glycol recovery system boiler, the Natco 36" OD x 12' .75 million BTU/hour heater, the Natco T7219701-01 3.0 million BTU/hour heater, the Cleaver Brooks CB-700-100 4.18 million BTU/hour boiler, the Natco N12C46901 7.0 million BTU/hour heater, the two hot water heaters and the four space heaters
 - b) four engine/compressor transition vents

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- c) one emergency natural gas blowdown
 - d) four fuel gas vents, four crankcase vents, four turbine housing vents and one cooling water tank vent
 - e) four storage tanks (not including a 10,000 gallon dehydration distillate storage tank subject to Section 129.57 of the Department's Rules and Regulations).
9. 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 combined volatile organic compound emissions from all fugitive sources at this facility shall never exceed 2.9 tons per year.
10. Within 180 days of the issuance of this operating permit, and additionally sometime during the interval beginning 2.5 years after the issuance of this operating permit and ending 4.5 years after said issuance, the company shall perform stack testing upon the 3 Ingersoll Rand KVG-104 engines and the Cooper Bessemer GMVR-6 engine for nitrogen oxides (NO_x expressed as NO₂), nonmethane hydrocarbons and volatile organic compounds using reference method test procedures acceptable to the Department. All testing is to be performed while the engines are operating at full load and full speed.
11. At least 60 days prior to the performance of any testing required by condition 10 herein, a pre-test 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.
12. 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 condition 10 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.
13. Within 60 days of completion of any testing required by condition 10 herein, 2 copies of a test report shall be submitted to the Department for the respective engines. The report shall contain the results of the testing reported in pounds/hour, a description of the testing and analytical procedures actually used, all engine operating data collected during the tests, a copy of all raw data and a copy of the calculations generated during data analysis. The test report shall specifically identify the horsepower at which each engine was operating during each of the test runs or, alternately, shall provide an acceptable demonstration that the engines were operated at full load/full speed conditions during the testing.
14. In addition to the testing required by condition 10 herein, the company shall perform annual NO_x tests upon each of the respective 4 engines using a portable exhaust gas analyzer which has been approved by the Department. The first such testing shall occur no more than one year after the testing required by condition 10 herein. The reference method retesting required by condition 10 herein may be

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substituted for the portable analyzer testing required by this condition or a one-for-one basis (one occurrence of reference method testing may be substituted for one of the once-per-year occurrences of portable analyzer testing).

15. The company shall submit specifications to the Department for the portable exhaust gas analyzer it proposes to use to comply with condition 14 herein by no later than 270 days after the initial testing required by condition 10 herein.
16. The results of all testing performed pursuant to condition 14 herein shall be submitted to the Department within 30 days of test performance.
17. In addition to the testing required by conditions 10 and 14 herein, the Department reserves the right to require such additional testing upon the respective 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.
18. 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 3 Ingersoll Rand KVG-104 engines and the Cooper Bessemer GMVR-6 engine is operated.
 - The amount of fuel used per calendar year in each of the Ingersoll Rand KVG-104 engines and the Cooper Bessemer GMVR-6 engine.
 - The number of hours per calendar year that the Caterpillar 3408B-SI auxiliary generator is operated.
 - The total combined amount of fuel used per calendar year in the Natco dehydration glycol recovery system boiler, the Natco 36" OD x 12' heater, the Natco T7219701-01 heater, the Cleaver Brooks CB-700-100 boiler, the Natco N12C46901 heater, the two hot water heaters and the four space heaters.

These records are to 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, 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 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.

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

Conditions 20 through 26 pertain to sources previously operated pursuant to operating permit 53-329-003A.

20. This operating permit supersedes all previously issued operating permits and temporary operating permits bearing the number 53-329-003A.
21. This operating permit is issued for the operation of three 1100 horsepower Ingersoll Rand KVG-104 natural gas-fired reciprocating engines, one 1350 horsepower Cooper Bessemer GMVR-6 natural gas-fired reciprocating engine, a Natco gas dehydration glycol recovery system (incorporating a reboiler), 3 Natco gas heaters, a Cleaver Brooks gas heater, an auxiliary generator and a 10,000 gallon aboveground dehydration distillate storage tank.
22. Pursuant to the best available technology provisions of Chapter 127 of the Rules and Regulations of the Department of Environmental Protection, the nitrogen oxides emissions from the Ingersoll Rand KVG-104 engines shall not exceed 7.27 pounds per hour, ~~the carbon monoxide emissions shall not exceed 7.27 pounds per hour~~ and the nonmethane hydrocarbon emissions shall not exceed 7.27 pounds per hour.

Additionally, the nitrogen oxides emissions from the Cooper Bessemer GMVR-6 engine shall not exceed 7.44 pounds per hour, ~~the carbon monoxide emissions shall not exceed 5.95 pounds per hour~~, and the nonmethane hydrocarbon emissions shall not exceed 1.49 pounds per hour.

Additionally, the nitrogen oxides emissions from the various heaters, etc. identified in condition 21 herein shall not exceed the levels specified in the plan approval applications.

In addition, the operation of the engines or any of the other air contamination sources identified in condition 21 herein 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 Protection.

23. The gas dehydration glycol recovery system shall incorporate a charcoal filter for the removal of hydrocarbons from the glycol stream exiting the glycol skimmer/flash vessel.
24. The vapor outlet of the reflux column associated with the glycol recovery system's reboiler shall be vented to the reboiler exhaust stack which shall be equipped with an oxidizer section designed as described in the supplemental materials submitted to the Department on March 3, 1989.

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"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 January 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 January 31, 1997; January 31, 1998; January 31, 1999 and January 31, 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.

32. The company shall immediately notify the Department of any malfunction of the engines, any of the other air contaminant sources listed herein or any piece of equipment used for air pollution control 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 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.
33. 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.

