

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL RESOURCES  
FIELD OPERATIONS - AIR QUALITY CONTROL

007 - 1

COMPLIANCE PERMIT

In accordance with Section 7.2 of the Air Pollution Control Act, the Act of January 8, 1960, P.S. 2119, as amended, 35 P.S. §4007.2, and Section 127.445 of Chapter 127 of the rules and regulations of the Department of Environmental Resources, the Department hereby issues this permit for the operation of the Major NOx Emitting Facility and Minor VOC Emitting Facility described below:

Permit No. <u>CP-15-0020</u>	Major NOx and Minor VOC Emitting Facility
Air Cleaning Device <u>Pre-Stratified Charge Retrofit (PSC) System</u>	Related Plan Approvals <u>PA-15-0020</u>
Owner <u>Columbia Gas Transmission Corporation</u>	RACT Proposal <u>Control Nox from 2 IC Engines</u>
Address <u>1470 Poorhouse Road</u>	Location <u>West Bradford Township</u>
<u>Downingtown, PA 19335</u>	<u>Chester County</u>
Attention <u>Mr. P. M. Hoffman</u>	
<u>Environmental Coordinator</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 manner as not to cause air pollution;
  - b. in compliance with the specifications and conditions of the applicable plan approval(s) and operating permit(s); and
  - 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 described above. This permit is valid for a period of 5 years for all sources listed in this operating permit except 2 IC engines. Upon completion and demonstration of the controls described in plan approval PA-15-0020, the company shall apply for a revised operating permit to include all 2 IC engines.~~

(SEE THE ATTACHED ADDITIONAL CONDITIONS)

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 09/15/95

Richard L. Ruhl

Expires ~~08/18/2000~~

RICHARD L. RUHL  
Acting Air Pollution Control Manager

c: Central Office  
Southeast Regional Office  
(KAL)

Conditions (continued):

3. This Compliance Permit is issued to Columbia Gas Transmission Corporation for the operation of the following sources at Downingtown station in Chester County. This Compliance Permit confirms the Department determination of Reasonably Available Control Technology (RACT) for Nitrogen Oxides (NOx).
  - A. two (2) identical natural gas fired spark ignited 1,250 hp Ingersoll-Rand compressor engines
  - B. one (1) 232 hp auxiliary generator
  - C. one (1) 1.43 MMBtu/hr heating system boiler; and
  - D. one (1) 0.025 MMBtu/hr fuel heater
  
4. The expiration date shown on the operating permit CP-15-0020 is for state purposes only. For Federal enforcement purposes the operating permit shall remain in the effect as part of the Pennsylvania State Implementation Plan (SIP) until repealed pursuant to 40 CFR 51 and approved by the United States Environmental Protection Agency (EPA). The Operating Permit shall become enforceable by the EPA upon its approval of the above as a revision to the SIP.

A. Compressor Engines

- (1) The operation of the following sources shall not emit air contaminants into the atmosphere in the excess of the limits listed below.

Units	EMISSION			
	NOx		VOC	
	lbs/hr	tons/yr	lbs/hr	tons/yr
1250 hp 410 KVGB Ingersoll-Rand engine	8.27	36.2	2.76	12.05
1250 hp 410 KVGB Ingersoll-Rand engine	8.27	36.2	2.76	12.05

- (2) The company shall use only natural gas as a fuel, and upon Department request, provide fuel analyses or fuel samples of the fuel used on engines.
  
- (3) Columbia Gas Transmission Corporation shall implement the RACT plan according to the schedule below:
  - a. Control equipment ordering - Equipment to be ordered within 2 week of plan approval issuance;

Compliance Permit Conditions  
Permit No. CP-15-0020  
Columbia Gas Transmission Corporation

Conditions (continued):

- b. Control equipment delivery - All necessary equipment shall be delivered within 10 weeks after plan approval issuance;
- c. Control equipment installation - Equipment shall be installed on both units within 11 weeks after plan approval issuance;
- d. Control equipment commissioning - Within 14 weeks after plan approval issuance all control equipment shall be operational.

B. Testing Requirements

- (1) Within one hundred eighty (180) days after the issuance of this RACT compliance permit, Columbia Gas Transmission Corporation must perform a stack test on all IC engines in accordance with the provisions of Chapter 139 of the rules and regulations of the Department compliance with condition No. 4.A.1.
- (2) The NOx emission limit applied at all times except during periods of start up and shut down provided however that the duration of start up and shut down shall not exceed 1 hour per occurrence.
- (3) At least thirty (30) days prior to the test, the Regional Air Pollution Control Engineer shall be informed of the date and time of the test.
- (4) The company shall perform semi-annual tests for NOx emissions using a Department approved portable analyzer. The Department may alter the frequency of portable analyzer test based on the test results. The Department reserves the right to require stack test in accordance with EPA reference method.
- (5) At least sixty (60) days prior to the stack test, the company shall submit to the Department for approval the procedures for the test and a sketch with dimensions indicating the location of sampling ports and other data to ensure the collection of representative samples.
- (6) Within thirty (30) days after the source test(s), two copies of the complete test report, including all operating conditions, shall be submitted to the Regional Air Pollution Control Engineer for approval.

C. Recordkeeping and Reporting Requirements

- (1) Company shall maintain records in accordance with the recordkeeping requirement of 25 PA Code §129.95.
- (2) Company shall maintain records of portable analyzer test results.

Conditions (continued):

5. Presumptive Sources

A. Source Description:

- (1) one (1) LeRoi model No. H-1000W7 (auxiliary generator) natural gas fired that for emergency use
- (2) one (1) 1.43 MMBtu/hr heating system boiler used for space heating purposes
- (3) one (1) 0.025 MMBtu/hr fuel heater

B. Operating Requirements:

- (1) The above mentioned sources (5A) shall be maintained and operated in accordance with manufacturer specifications.
- (2) The above mentioned sources (5A) shall be fired on natural gas only.
- (3) The auxiliary generator shall be operated less than 500 hours in a consecutive twelve month period individually.

C. Recordkeeping Requirements:

- (1) Annual reports on fuel consumption and hours of operation for the auxiliary generator.
- (2) The time and date of any manufacturer prescribed maintenance.
- (3) Records required under this operating permit shall be kept for a period of two years and shall be made available to the Department upon its request.

~~6. General Requirements~~

- ~~A. The company shall not impose conditions upon or otherwise restrict the Department's access to the aforementioned source(s) and/or any associated air cleaning device(s) and shall allow the Department to have access at any time to said source(s) and associated air cleaning device(s) with such measuring and recording equipment, including equipment recording visual observations, as the Department deems necessary and proper for performing its duties and for the effective enforcement of the Air Pollution Control Act.~~
- ~~B. If at any time the Department has cause to believe that air contaminant emissions from the aforementioned source(s) may be in excess of the limitations specified in, or established pursuant to, any applicable rule or regulation contained in Article III of the Rules and~~

Conditions (continued):

~~Regulations of the Department of Environmental Protection, the company shall be required to conduct whatever tests are deemed necessary by the Department to determine the actual emission rate(s). Such testing shall be conducted in accordance with the provisions of Chapter 139 of the Rules and Regulations of the Department of Environmental Protection, where applicable, and in accordance with any restrictions or limitations established by the Department at such time as it notifies the company that testing is required.~~

~~wp The company, within one hour of occurrence, shall notify the Department at (610) 832-6242, 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. A written report shall be submitted to the Department within two working days following the incident describing the malfunctions and corrective actions taken.~~

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