

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

RACT PLAN APPROVAL

Permit No.: 32-000-303

Source : (2) Ajax DPC-600 Engines

Owner : CNG Transmission Corporation

Air : OEM's Low NOx Conversion Kits
Cleaning:
Devices :

Address : 455 West Main Street
Clarksburg, WV 26301

Attention : Sean R. Sleight
Engineer

Plant : Cherry Tree Station
Location: Montgomery Township
County : Indiana

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 July 5, 1995 approved plans for the temporary operation and modification of the above indicated air contamination source(s)

This PLAN APPROVAL expires 05/31/96

The plan approval is subject to the following conditions:

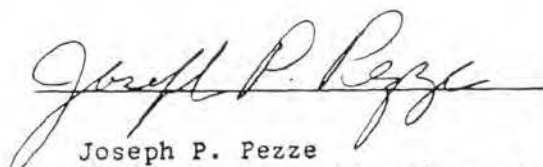
1. This Plan Approval does not waive, either expressly or by implication, the power or authority of the Commonwealth of Pennsylvania to prosecute for any and all violations of law arising prior to or after the issuance of this Plan Approval. The issuance of this Plan Approval shall not be construed so as to waive or impair any rights of the Department of Environmental Resources, heretofore to hereafter existing.

2. Upon completion of the modification of the above indicated air cleaning device a operating permit must be obtained from the person noted below.

3. See attached.

Notify the person noted below when the installation is completed so that the source can be inspected for issuance of an OPERATING PERMIT.

NOTE: Barbara R. Hatch
Engineering Services
(412) 442-5226


Joseph P. Pezze
Regional Air Quality Manager
Southwest Region

EPA, REGION III

CNG Transmission Corporation
 RACT Plan Approval #32-000-303

Special Conditions

3. This Plan Approval indicates Departmental approval of the Reasonably Available Control Technology (RACT) proposal submitted by Consolidated Natural Gas (CNG) Transmission Corporation for the Cherry Tree Station, located in Montgomery Township, Indiana County, Pennsylvania.
4. RACT for the two Ajax DPC-600 engines shall be the installation of the Original Equipment Manufacturer's (OEM's) low NOx conversion kits in accordance with the plans submitted in the Application for Plan Approval dated April 4, 1994. RACT shall also be the subsequent operation and maintenance of these units in accordance with manufacturer's specifications, and good air pollution control practices.
5. RACT for the Latoka 2885-01A unit (rated at 0.26 mmbtu/hr) on the dehydrator system shall be the operation and maintenance of this unit in accordance with the manufacturer's specifications, per Pa. Code Title 25 Chapter 129.93(c)(1). This source shall also be operated and maintained in accordance with good air pollution control practices.
6. The implementation of RACT shall result in emissions from the equipment at this station being established as follows:

Emission / Limitations (pounds per hour / tons per year)				
<u>Source</u>	<u>Rating</u>	<u>NOx</u>	<u>CO</u>	<u>VOC</u>
Latoka 2885-01A dehydrator	0.26 mmbtu/hr	0.024/0.1	N/A	N/A
Ajax DPC-600 engines (X2)	600 hp	15.2/66.6	9.3/40.8	2.8/12.3

7. CNG shall track and record hours of operation, natural gas consumption rate, portable analyzer results and all maintenance operations performed on this equipment to comply with the recordkeeping requirements of Pa. Code Title 25 Chapter 129.95.
8. Stack testing using EPA methods shall be performed on the exhaust from the two Ajax DPC-600 engines to verify the emission rates of NOx (as NO₂), CO and VOC during the first ozone season (April through October) following the installation of the OEM kit, and on an average of every five years thereafter. Fuel consumption rate, engine operation parameters, and portable analyzer readings shall be recorded during the duration of the stack test. Test shall be conducted while engine is running at full load.
9. Stack testing shall be performed in accordance with Pa. Code Title 25 Chapter 139 and the Department's Source Test Manual.
10. The company shall submit a pretest protocol to the Department for review at least sixty (60) days prior to the performance of the EPA method stack tests.

11. The company shall also notify the Department at least two weeks prior to the EPA method stack tests so that an observer may be present at the time of the test.
12. The company shall submit two copies of the EPA method stack test results report to the Department within sixty days of testing.
13. Stack testing using a portable analyzer shall be performed two times per year on the emissions from the Ajax engines. CNG shall submit a complete operating procedure (including calibration, QA/QC and emissions calculation methods to the Department at least sixty (60) days prior to the stack test specified in Condition 8, above. Relative accuracy of the portable analyzer will be established by operation and recording of readings during the EPA stack test of Condition 8. Results from stack tests using portable analyzers shall be retained by CNG and be made available to the Department upon request. Sources operating less than 750 hours during the previous ozone season (April through October) shall stack test using portable analyzers once per year.
14. The Department reserves the right to revise the emission limits established above based on actual emission rates.
15. Emission reductions of the targeted contaminants(s) below the level specified in this approval which are achieved by optimizing the effectiveness of equipment installed pursuant to this plan approval are not surplus emission reductions, and, thus, may not be used to generate Emission Reduction Credits. In order for the emission reductions to be creditable, the emission reductions must satisfy the requirements of 25 Pa. Code Chapter 127, Subchapter E.
16. This Plan Approval authorizes the continued operation of the existing sources until they are modified. This Plan Approval also authorizes the temporary operation of the modified sources covered by this Plan Approval provided the following conditions are met.
 - A. The Department must receive written notice from the Owner/Operator of when the Operator expects to commence operation of the modified sources.
 - B. Operation is authorized only to facilitate the startup and shakedown of modified sources and air cleaning devices, to permit operations pending the issuance of an Operating Permit or to permit the evaluation of the sources for compliance with all applicable regulations and requirements.
 - C. This condition authorizes temporary operation of the modified sources 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.~~