

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

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

Permit No.:	<u>OP-53-0007</u>	Source &	<u>two 720 Hp natural gas-fired</u>
Owner:	<u>National Fuel Gas Supply Corporation</u>	Air	<u>engines equipped with clean</u>
		Cleaning	<u>burn combustion technology,</u>
Address:	<u>P. O. Box 2081</u>	Device:	<u>and other auxiliary equipment,</u>
	<u>Erie, PA 16512</u>		<u>as described herein.</u>
Attn:	<u>Gary A. Young</u>	Location:	<u>East Fork Compressor Station</u>
	<u>Associate Engineer</u>		<u>Wharton Township, Potter Co.</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 Resources will result in suspension or revocation of this permit and/or prosecution under Section 9 of the Air Pollution Control Act.

Issued: JUL 17 1995

Expires: ~~July 31, 2000~~

cc: Harrisburg
File
Mansfield


Environmental Program Manager

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3. This operating permit incorporates Reasonably Available Control Technology (RACT) determinations as required by provisions of Title I of the Clean Air Act Amendments and 25 PA Code Section 129.91 through 129.95 for two 720 horsepower Ajax DPC-720 natural gas-fired reciprocating engines equipped with clean burn combustion technology as well as for 6 space heaters, 4 hot water heaters, 3 pipeline heaters and one 105 horsepower standby generator (as listed in Section B of the RACT operating permit application), all of which are natural gas-fired.
4. This operating permit supersedes operating permit #53-329-005 and incorporates conditions previously included in that operating permit.
5. The expiration date shown on this operating permit is for state purposes. For Federal enforcement purposes the operating permit shall remain in effect as part of the State Implementation Plan (SIP) until replaced pursuant to 40 CFR 51.4 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.
6. 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 Resources, the 3 Ajax DPC-540 engines shall comply with the nitrogen oxides (NO_x expressed as NO_2) emission limit specified in condition 20 herein.
7. Pursuant to the presumptive RACT requirements of 25 Pa. Code 129.93(c), the emergency electric generator, three pipeline heaters, four water heaters and six space heaters (as listed in Section B of NFGS' RACT operating permit application dated 11/2/94) shall be maintained and operated in accordance with good air pollution control practices, and the emergency generator shall not be operated 500 hours or more in any calendar year.
8. Within 180 days of the issuance of this operating permit and additionally at five-year intervals thereafter, the company shall perform reference method nitrogen oxides, carbon monoxide, nonmethane hydrocarbon and volatile organic compound stack testing upon each of the two DPC-720 engines. These tests are to be performed using test procedures which are acceptable to the Department and while the engines are being operated at full load and speed.
9. At least 60 days prior to the scheduled performance of any testing required by condition 8 herein, the company shall submit a pretest plan to the Department for evaluation. This plan shall contain a description of the testing and analytical methods to be used for the testing as well as dimensioned drawings of the engine exhausts showing the location of the proposed sampling ports.
10. The Department shall be given at least 10 days advance notice of the scheduled date(s) for the performance of any testing required by condition 8 herein so that Department personnel can arrange to be present.

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COMPANY: National Fuel Gas Supply Corp.

11. Within 60 days of completion of any testing required by condition 8 herein, 2 copies of a test report shall be submitted to the Department. This report shall contain the results of the testing (expressed as both pounds per hour and grams per horsepower-hour), a description of the testing and analytical procedures actually used, a copy of all pertinent engine operating parameters occurring during testing, a copy of all raw test data generated during the testing and a copy of all associated calculations.
12. In addition to the testing required by condition 8 herein, the company shall perform nitrogen oxides testing upon the 2 Ajax DPC-720 engines every six months using a Department-approved portable exhaust gas analyzer. The first such testing shall occur approximately 6 months after the testing required by condition 8 herein.
13. The company shall submit specifications to the Department for the portable exhaust gas analyzer it proposes to use to comply with condition 12 herein by no later than 90 days after the testing required by condition 12 herein.
14. The results of all testing performed pursuant to condition 12 herein shall be submitted to the Department within 30 days of test performance.
15. In addition to the testing required by conditions 8 and 12 herein, the Department reserves the right to require such additional testing upon the engines as it may deem necessary to determine compliance with any condition contained herein.
16. The company shall maintain records in accordance with the requirements of Section 129.95 of Chapter 129 of Article III of the Rules and Regulations of the Department of Environmental Resources which shall, at a minimum, include readings of the following engine parameters at least once per 8 hour shift:

Engine Speed	Engine Load (% developed torque)
Ambient Temperature	Air Manifold Pressure
Fuel Manifold Pressure	Exhaust Gas Temperature
Ignition Timing	

These records as well as a record of cumulative annual operating hours for each engine shall be made available to Department inspectors or submitted to the Department upon request.

17. These sources shall only be fired on pipeline quality natural gas.

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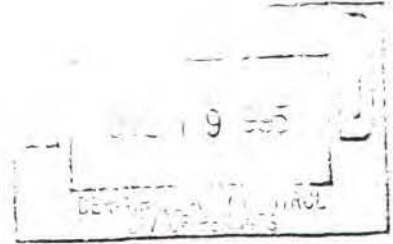
18. If at any time the permittee causes, permits or allows any modification (as that term is defined in Chapter 121 of Title 25, the Rules and Regulations of the Department of Environmental Resources) of the aforementioned air contamination source(s), the operation and use of which is authorized by this permit, or causes, permits or allows any modifications, malfunction or removal of any air pollution control device required as a condition of this permit, then and in that event, this permit shall be suspended, and the permittee shall not thereafter continue to operate or use said air contamination source(s).
19. The aforementioned source(s) may be operated and used only so long as any associated air pollution control devices are operated and maintained in accordance with the specifications set forth in the respective plan approval(s), and the application(s) submitted for said plan approval(s) (as approved by the Department), and in accordance with any conditions set forth herein.
20. Pursuant to the best available technology provisions of Chapter 127 of the Rules and Regulations of the Department of Environmental Resources, the nitrogen oxides emissions from either of the 2 Ajax DPC-720 engines shall not exceed 4.76 pounds per hour, the carbon monoxide emissions shall not exceed 1.59 pounds per hour and the nonmethane hydrocarbon emissions shall not exceed .96 pounds per hour. Additionally, neither of the engines shall emit 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 Resources.
21. The 2 Ajax DPC-720 engines shall not be operated more than a combined total of 16,800 hours per year and the resultant nitrogen oxides emissions shall not equal or exceed a combined total of 40 tons per year.
22. 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 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 Resources.
23. 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 July 1, 2000.

An annual operating permit administration fee is also due pursuant to Section 127.703 no later than 7/31/96, 7/31/97, 7/31/98 and 7/31/99. 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.

24. Any notification required as a result of any condition herein should be directed to: Grant D. Bridenbaugh, Air Pollution Control Engineer, 200 Pine Street, Williamsport, PA 17701-6510, telephone (717) 321-6575.

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF AIR QUALITY



PLAN APPROVAL

Plan Approval No.:	<u>PA-53-0007A</u>	Source &	<u>3 Ajax DPC-540 gas-fired</u>
Owner:	<u>National Fuel Gas Supply Corporation</u>	Air	<u>engines</u>
		Cleaning	<u></u>
Address:	<u>P. O. Box 2081</u>	Device:	<u></u>
	<u>Erie, PA 16512</u>		<u></u>
Attn:	<u>Gary A. Young</u>	Location:	<u>East Fork Compressor Station</u>
	<u>Associate Engineer</u>		<u>Wharton Township, Potter Co.</u>

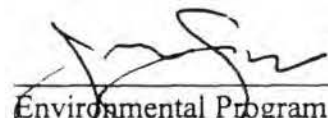
In accordance with provisions of the Air Pollution Control Act, the Act of January 8, 1960, P.L. 2119, as amended, and with Chapter 127 of the rules and regulations of the Department of Environmental Resources, the Department on JUL 17 1995 approved plans for the installation of air cleaning devices on the above indicated air contamination sources and the implementation of Reasonably Available Control Technology (RACT) requirements.

This **PLAN APPROVAL** expires 1/31/97

The plan approval is subject to the following conditions:

- (1) The air cleaning devices are to be installed in accordance with the plans submitted with the application (as approved herein).

See attached for additional conditions.



Environmental Program Manager
Air Quality Program
Northcentral Region

cc: Harrisburg
Mansfield
File

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2. Upon completion of air cleaning device installation and the implementation of the RACT control measures, an operating permit must be obtained.
3. This plan approval includes a Reasonably Available Control Technology (RACT) determination as required by the provisions of Title I of the Clean Air Act Amendments and 25 PA Code Sections 129.91 through 129.95 for three 540 horsepower Ajax DPC-540 natural gas-fired reciprocating engines.
4. This plan approval is issued for the installation of low emission combustion retrofit kits on three 540 horsepower Ajax DPC-540 natural gas-fired reciprocating engines.
5. This plan approval supersedes Plan Approval #53-329-005A.
6. 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 Resources, the nitrogen oxides (NO_x expressed as NO₂) emissions from each of the Ajax DPC-540 engines shall not exceed the following limitations following the completion of the low emission combustion retrofit kit installations:

Full load & full speed

3.6 pounds/hour

Never to be exceeded at any time

7.1 pounds/hour

7. The carbon monoxide (CO) and nonmethane hydrocarbon (NMHC) emission rates from these engines shall not at any time exceed 2.4 and 2.1 pounds/hour, respectively, per engine.
8. Only pipeline quality natural gas shall be used as fuel in these engines.
9. Nothing in this plan approval shall be construed as an extension of the May 31, 1995 RACT compliance date specified in 25 Pa. Code Section 129.91.
10. Within 180 days of plan approval issuance, the company shall perform reference method nitrogen oxides, carbon monoxide, nonmethane hydrocarbon and volatile organic compound stack testing upon each of the 3 Ajax DPC-540 engines. All testing is to be done using test procedures which are acceptable to the Department while the engines are operating at full load and full speed.

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11. At least 60 days prior to the scheduled performance of the testing required by condition 10 herein, the company shall submit a pretest plan to the Department for evaluation. This plan shall contain a description of the testing and analytical methods to be used for the testing as well as dimensioned drawings of the engine exhausts showing the location of the proposed sampling ports.
12. The Department shall be given at least 10 days advance notice of the scheduled date(s) for the performance of the testing required by condition 10 herein so that Department personnel can arrange to be present.
13. Within 60 days of completion of the testing required by condition 10 herein, 2 copies of a test report shall be submitted to the Department. This report shall contain the results of the testing (expressed as both pounds per hour and grams per horsepower-hour), a description of the testing and analytical procedures actually used, a copy of all pertinent engine operating parameters occurring during testing, a copy of all raw test data generated during the testing and a copy of all associated calculations.
14. In addition to the testing required by condition 10 herein, the company shall perform nitrogen oxides testing upon each of these 3 engines every six months using a Department-approved portable exhaust gas analyzer. The first such testing shall occur approximately 6 months after the testing required by condition 10 herein.
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 90 days after the 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 engines as it may deem necessary to determine compliance with any condition contained herein.

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18. The company shall maintain records in accordance with the requirements of Section 129.95 of Chapter 129 of Article III of the Rules and Regulations of the Department of Environmental Resources which shall, at a minimum, include readings of the following parameters taken at least once per 8 hour shift:

Engine Speed	Engine Load (% developed torque)
Ambient Temperature	Air Manifold Pressure
Fuel Manifold Pressure	Exhaust Gas Temperature
Ignition Timing	

These records as well as a record of cumulative operating hours for each engine shall be made available to the Department inspectors or submitted to the Department upon request.

19. Issuance of an operating permit for the 3 Ajax DPC-540 engines is contingent upon a satisfactory demonstration of compliance with all conditions contained herein as well as with the requirements specified in, or established pursuant to, all applicable rules and regulations contained in Article III of the Rules and Regulations of the Department of Environmental Resources.
20. This Plan Approval authorizes temporary operation of the source(s) covered by this Plan Approval provided the following conditions are met.
- (a) The Department must receive written notice from the Owner/Operator of the completion of construction and the Operator's intent to commence operation at least five (5) working days prior to the completion of construction. The notice should state when construction will be completed and when Operator expects to commence operation.
 - (b) Operation is authorized only to facilitate the start-up and shake-down of sources and air cleaning devices, to permit operations pending the issuance of an Operating Permit or to permit the evaluation of the source(s) for compliance with all applicable regulations and requirements.
 - (c) This condition authorizes temporary operation of the source(s) 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.

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COMPANY: National Fuel Gas Supply Corporation

- (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.
21. Any notification required as a result of any condition herein should be directed to: Grant D. Bridenbaugh, Air Pollution Control Engineer, 200 Pine Street, Williamsport, PA 17701-6510, telephone (717) 321-6575.
22. The air contaminant emission limitations specified in conditions 6 and 7 herein do not apply during periods of engine startup and shutdown provided that any such startup or shutdown is limited to one hour in duration.

