COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF AIR QUALITY

PLAN APPROVAL

Plan Appr	oval No.: PA-18-0004A	Source &	13 natural gas-fired reciprocating
Owner:	CNG Transmission Corporation	Air	engines, as described herein
		Cleaning	
Address:	Box 2450	Device:	
	Clarksburg, WV 26302-2450		
Attn:	Sean R. Sleigh, Engineer	Location:	Leidy Station
	Environmental Services	2	Leidy Township
			Clinton County
This PLA	N APPROVAL expires 5/31/96		MAY 1 3 1996
This PLA	N APPROVAL empires_5/31/96		MAY 1 3 1996
The plan a	approval is subject to the following condition	ons:	EPA, REGION III
cor	e air cleaning devices are to be installed as atrol measures that shall be implemented in plication (as approved herein).		
See	e attached for additional conditions.		
			20
		6	
			nvironmental Program Manager ir Quality Program
			orthcentral Region
cc: Harri	isburg		
	k Run		

File

COMPANY: CNG Transmission Corporation

- This plan approval 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) two 3400 horsepower Clark TCV-10 natural gas-fired reciprocating engines
 - eight 2000 horsepower Ingersoll Rand 512 KVS ET and 512 KVS FT natural gas-fired reciprocating engines
 - three 1000 horsepower Ingersoll Rand 36 KVS ET natural gas-fired reciprocating engines.
- 3. This plan approval is issued for the installation of air cleaning devices (low emission combustion retrofit kits) on the 13 engines identified in condition 2 herein. This plan approval is also issued for the modification of the 2 Clark TCV-10 engines, said modification consisting of the 16.47 ton/year increase in the respective engines' combined potential to emit volatile organic compounds which will occur as a result of the low emission combustion retrofit kit installations.

This plan approval does not authorize any increase in the volatile organic compound emission rate of the 8 Ingersoll Rand 512 KVS ET/512 KVS FT engines or the 3 Ingersoll Rand 36 KVS ET engines identified in condition 2 herein.

4. 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 nitrogen oxides (NOx, expressed as NO₂) emissions from each of the two Clark TCV-10 engines identified in condition 2 herein shall not exceed the following limitations following the completion of low emission combustion retrofit kit installation (except as may be allowed pursuant to compliance permit CP-18-0004A and/or condition 7 herein):

Full Load/Full Speed

Never to be Exceeded at Any Time

22.47 pounds per hour

44.93 pounds per hour

Additionally, the emission of volatile organic compounds from each of the 2 engines shall not exceed 6.0 pounds per hour following the low emission combustion retrofit kit installations.

COMPANY: CNG Transmission Corporation

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 nitrogen oxides (NOx, expressed as NO₂) emissions from each of the eight Ingersoll Rand 512 KVS ET and 512 KVS FT engines identified in condition 2 herein shall not exceed the following limitations following the completion of the low emission combustion retrofit kit installations (except as may be allowed pursuant to compliance permit CP-18-0004A and/or condition 7 herein):

Full Load/Full Speed

Never to be Exceeded at Any Time

13.22 pounds per hour

26.43 pounds per hour

Additionally, the emission of volatile organic compounds from each of the 8 engines shall not exceed 7.26 pounds per hour following the low emission combustion retrofit kit installations.

6. 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 nitrogen oxides (NOx, expressed as NO₂) emissions from each of the three 1,000 horsepower Ingersoll Rand 36 KVS ET engines identified in condition 2 herein shall not exceed the following limitations following the completion of the low emission combustion retrofit kit installations (except as may be allowed pursuant to compliance permit CP-18-0004A and/or condition 7 herein):

Full Load/Full Speed

Never to be Exceeded at Any Time

6.61 pounds per hour

13.22 pounds per hour

Additionally, the emission of volatile organic compounds from each of the 3 engines shall not exceed 3.63 pounds per hour following the low emission combustion retrofit kit installations.

- 7. The 13 engines identified in condition 2 herein are not required to comply with the emission limits specified in conditions 4, 5 and 6 herein during engine startup and shutdown provided that the duration of startup or shutdown does not exceed one hour per occurrence.
- 8. This plan approval supersedes plan approval 18-329-003.
- 9. Installation of the low emission combustion retrofit kits and the implementation of RACT shall proceed as expeditiously as practicable but shall not extend beyond May 31, 1996. 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-18-0004A.

COMPANY: CNG Transmission Corporation

- Only pipeline quality natural gas shall be used as fuel in the 13 engines identified in condition 2 herein.
- 11. 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 engines identified in condition 2 herein for nitrogen oxides (NOx expressed as NO₂), carbon monoxide, volatile organic compounds and nonmethane 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.
- 12. At least 60 days prior to the performance of any testing required by condition 11 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.
- 13. 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 11 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.
- 14. Within 60 days of completion of any testing required by condition 11 herein, two copies of a test report shall be submitted to the Department. 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 operated 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.
- 15. In addition to the testing required by condition 11 herein, the company shall perform semi-annual NOx tests upon each of the respective engines using a portable exhaust gas analyzer which has been approved by the Department. The first such testing shall occur no more than 6 months after the testing required by condition 11 herein. The reference method retesting required by condition 11 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).

COMPANY: CNG Transmission Corporation

- 16. The company shall submit specifications to the Department for the portable exhaust gas analyzer it proposes to use to comply with condition 15 herein by no later than 90 days after the testing required by condition 11 herein.
- 17. The results of all testing performed pursuant to condition 15 herein shall be submitted to the Department within 30 days of test performance.
- 18. In addition to the testing required by conditions 11 and 15 herein, the Department reserves the right to require such additional testing upon the respective engines 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.
- 19. The company shall maintain comprehensive accurate records in accordance with 25 Pa. Code 129.95 which, at a minimum, shall include:
 - The number of hours per calendar year that each engine is operated.
 - The amount of fuel used per calendar year in each engine.

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.

- 20. Issuance of an operating permit for the engines identified in condition 2 herein is contingent upon 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 Protection.
- Any notification required as a result of any condition herein should be directed to: John Twardowski, Air Pollution Control Engineer, 208 West Third Street, Suite 101, Williamsport, PA 17701-6448, telephone (717) 321-6523.