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

RACT OPERATING PERMIT

In accordance with provisions of the Air Pollution Control 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 described below.

Permit No.: 65-000-837

: CNG Transmission Corporation

Air Ignition Timing Retardation

Source : Internal Combustion Engines

Address : 445 West Main Street

P.O. Box 2450

Clarksburg, WV 26302

Devices :

Cleaning

Plant : Oakford Compressor Station

Attention : Sean R. Sleigh Location : Salem Township

County : Westmoreland County

This permit is subject to the following conditions:

(1) That the source and any associated air cleaning devices are to be:

(a) operated in such a manner as not to cause air pollution;

- (b) operated and maintained in a manner consistent with good operating and management practices.
- (2) This permit is valid only for the specific equipment, location and owner named above.
- (3) See attached.

Failure to comply with the conditions placed on this permit is a violation of section 127.25. 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: 10/13/95

Joseph P. Pezze

Regional Air Quality Manager

Southwest Region

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Special Conditions

- 3. This RACT Operating Permit is for the installation of ignition timing retard technology and INOx plasma ignition systems on twelve (12) Cooper GMW-10TF internal combustion engines and for the installation of ignition timing retard technology on two (2) Worthington SEHG-L internal combustion engines at the Consolidated Natural Gas Transmission Oakford compressor station located in Salem Township, Westmoreland County.
- 5. Emission limits for the engines at this facility are as follows:

		EMISSION LIMITS							
	N	NOX		0	VOC				
Source	lbs/hr	t/y	lbs/hr	t/y	lbs/hr	t/y			
(12) Cooper GMW-10TF	74.41	325.9	3.30	14.5	1.20	5.26			
(2) Worthington SEHG	-L 28.67	125.6	N/A	N/A	0.25	1.07			
(1) Ingersoll-Rand	3.88	17.0	N/A	N/A	0.40	1.75			
JVG Dehy Engine									

7. The following sources will implement presumptive RACT in accordance with 25 Pa. Code Section 129.93:

	= 1			Applicable Presumptive RACT					
Source		Rating		Emission Limitation					
(2)	Kewanee Boilers	16.74	MMBTU/hr	25	PA	Code	Section	129.93	(c)(7)
(1)	Hot Water Boiler	0.1	MMBTU/hr	25	PA	Code	Section	129.93	(c)(1)
(2)	NATCO Type WT	9.4	MMBTU/hr	25	PA	Code	Section	129.93	(c)(1)
	Process Heaters								
(7)	Drip Gasoline	(2)	11,600 gal	25	PA	Code	Section	129.57	
	Storage Tanks	(5)	14,600 gal	25	PA	Code	Section	129.57	
(2)	Methanol Storage		6,000 gal	25	PA	Code	Section	129.57	
	Tanks								

8. For those sources specified in Condition 7 which CNGT has elected to utilize presumptive technology provided for in 25 Pa. Code 129.93(c), CNGT shall operate and maintain the source in accordance with good air pollution control practices.

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Special Conditions

- 9. A minimum of one (1) stack test in accordance with 25 PA Code Chapter 139 and the Department's Source Testing Manual shall be performed on all engines during the 5 year Operating Permit to verify the emission rates for NOx (as NO2), CO, and NMVOC. Testing shall be conducted while engines are operating at full load/full speed conditions during the ozone season (April to October).
- 10. All engines operating 750 hours or more during the preceding ozone season shall be stack tested semi-annually to verify the rates of NOx (as NO2), CO, and NMVOC through either an EPA Method stack test or through the use of portable monitors.
- 11. All engines operating less than 750 hours during the preceding ozone season shall be stack tested annually to verify the rates of NOx (as NO2), CO, and NMVOC through either an EPA Method stack test or through the use of portable monitors.
- 12. For those tests utilizing portable monitors, the company shall submit a complete operating procedure including calibration, QA/QC, and emissions calculation methods to the Department at least 60 days prior to the stack test specified in Condition 9, above. The accuracy of the portable analyzer readings shall be verified by operation and recording of readings during the EPA method stack testing of Condition 9. Results from stack tests using portable analyzers shall be retained by the company at the test location and provided annually with the emission statements and at other times as requested by the Department.
- 13. CNGT shall submit a pretest protocol for review at least 60 days prior to performance of the stack tests.
- 14. The Department shall be notified at least two weeks in advance of the date and time of the stack test so that an observer may be present.
- 15. Two copies of the stack test results shall be supplied to the Department for review within sixty (60) days of completion of testing.
- 16. CNGT shall maintain records in accordance with the recordkeeping requirements of 25 Pa. Code Section 129.95. At a minimum, the following records shall be kept for each engine: operating hours, daily fuel consumption, operating pressures, and operating temperatures. These records shall be maintained on file at the facility for not less than two years and shall be made available to the Department upon request.

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Special Conditions

18. The RACT requirements shall be implemented as expeditious as practicable but no later than May 31, 1996.