COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF AIR QUALITY

PLAN APPROVAL

Plan Approval No.:	PA-59-0002A	Source & Air Cleaning Device:	seven natural gas-fired reciprocating engines, as described herein
Owner:	CNG Transmission Corporation		
Address:	445 West Main Street Clarksburg, WV 26301-2450		
Attn:	Sean R. Sleigh	Location:	Sabinsville Compressor Station Clymer Township Tioga County

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 Protection, the Department on DEC 1[illegible]1995 approved plans for the installation of air cleaning devices on, and the modification of, the above indicated engines.

~~This PLAN APPROVAL expires 5/31/96~~

FEB 23 1996

The plan approval is subject to the following conditions:

(1) The air cleaning devices are to be installed as Reasonably Available Control [illegible] EPA, REGION III (RACT) control measures that shall be implemented 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. This plan approval incorporates Reasonably Available Control Technology (RACT) determinations 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 two 2000 horsepower Clark Model TLA-6 turbo-charged natural gas-fired reciprocating internal combustion engines and five 1300 horsepower Clark Model HBA-5T turbo-charged natural gas-fired reciprocating internal combustion engines.

3. This plan approval is issued for the installation of air cleaning devices (low emission combustion retrofit kits) on the two Clark Model TLA-6 internal combustion engines and the five Clark Model HBA-5T internal combustion engines identified in condition 2 herein. This plan approval is also issued for the modification of the respective engines, said modification consisting of ~~the 8.3 ton/year increase and~~ the 9.64 ton/year increase in the two Clark Model TLA-6 engines' combined potential to emit ~~carbon monoxide and~~ volatile organic compounds emissions ~~respectively and the 70 ton/year increase~~ and the 15.8 ton/year increase in the five Clark Model HBA-5T engines' combined potential to emit ~~carbon monoxide and~~ volatile organic compounds emissions ~~respectively~~ which will all occur as a result of the low emission combustion retrofit kit installations.

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 NO_2) emissions from each of the two Clark Model TLA-6 internal combustion engines 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-59-0002A and/or condition 6 herein):

Full Load/Full Speed	**Never to be Exceeded at Any Time**
13.23 pounds per hour	26.4 pounds per hour

Additionally, the emission of volatile organic compounds ~~and carbon monoxide~~ from each of the two engines shall not exceed 3.5 lb/hr ~~and 11.96 pounds per hour, respectively~~, following the installation of the low emission combustion retrofit kit installations.

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 NO_2) emissions from each of the five Clark Model HBA-5T internal combustion engines 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-59-0002A and/or condition 6 herein):

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Full Load/Full Speed	**Never to be Exceeded at Any Time**
8.60 pounds per hour	17.16 pounds per hour

Additionally, the emission of volatile organic compounds ~~and carbon monoxide~~ from each of the five engines shall not exceed 2.30 and 1~~0.37~~ pounds per hour, respectively, following the installation of the low emission combustion retrofit kit installations.

6. The two Clark Model TLA-6 internal combustion engines and the five Clark Model HBA-5T internal combustion engines are not required to comply with the emission limits specified in conditions 4 and 5 herein during engine startup and shutdown provided that the duration of startup or shutdown does not exceed one hour per occurrence.

7. Only pipeline quality natural gas shall be used as fuel in the four engines referenced in condition 2 herein.

8. This plan approval supersedes plan approval 59-329-003.

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 Department of Environmental Protection is contingent upon compliance with the terms and conditions of compliance permit CP-59-0002A.

10. 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 NO_2), ~~carbon monoxide~~, volatile organic compounds ~~and non-methane 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.

11. At least 60 days prior to the performance of any testing required by condition 10 herein, a pretest 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.

12. 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 10 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.

13. Within 60 days of completion of the testing required by condition 10 herein, two copies of the test report shall be submitted to the Department for the respective engines identified in condition 2 herein. The report shall contain the results of the testing reported above in pounds per 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.

14. In addition to the testing required by condition 10 herein, the company shall perform semi-annual NOx tests upon each of the respective engines identified in condition 2 herein using a portable exhaust gas analyzer which has been approved by the Department. The first such testing shall occur no more than six months after the testing required by condition 10 herein. The reference method retesting required by condition 10 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).

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 initial 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 respective engines, or any other source identified herein, 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.

18. 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 two 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.

19. Issuance of an operating permit for the two Clark Model TLA-6 internal combustion engines and the five Clark Model HBA-5T internal combustion engines identified in condition 2 herein is contingent upon satisfactory demonstration of compliance with all applicable 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 Department of Environmental Protection.

20. 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.