



TRC  
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Windsor, CT 06035  
Main 860.298.9692

## Memorandum

**To:** Seng Phouthakoun, Rickey Bouffard, and Jacob Felton  
(CTDEEP)  
**From:** James Ryan  
Project Engineer  
**Subject:** AGT Cromwell VOC RACT Plan – Response to Connecticut Department of  
Energy & Environmental Protection (CTDEEP) Requests  
**Date:** April 28, 2023  
**CC:** Barry Goodrich (Enbridge), Caitlin Shaw (Enbridge), Kate Brown (Enbridge),  
Erika St. Pierre (Enbridge), Albert Wilder (TRC)  
**Project No.:** 505556

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Algonquin submitted a VOC RACT Compliance Plan to CTDEEP on December 20, 2021, for the Algonquin Cromwell Compressor Station (the Facility). TRC provided memorandums to CTDEEP on March 15, 2022, and February 22, 2023, which provided additional information in response to CTDEEP requests. This memorandum provides additional information requested by Seng Phouthakoun and Jacob Felton during a meeting on February 24, 2023.

### **Pneumatic Controller Replacement Cost Effectiveness**

On November 15, 2021, the United States Environmental Protection Agency (USEPA) issued Proposed Standards of Performance for New, Reconstructed, and Modified Sources and Emissions Guidelines for Existing Sources: Oil and Natural Gas Sector Climate Review (NSPS OOOOb and EG OOOOc). On December 6, 2022 the USEPA issued a supplemental proposal (EPA-HQ-OAR-2021-0317-1460) updating the NSPS OOOOb and EG OOOOc proposal.

The CTDEEP has recommended that VOC RACT for the existing pneumatic controllers at the Cromwell Compressor Station is replacement with zero emission controllers, in accordance with the proposed emissions guidelines of OOOOc. During the February 24, 2023 meeting, CTDEEP requested Enbridge provide a “top-down” cost analysis to demonstrate whether it is cost effective to control VOC emissions by replacing the existing pneumatic controllers.

TRC performed an in-depth review of the NSPS OOOOb/EG OOOOc rulemaking docket and determined that a pertinent cost effectiveness evaluation was already performed as part of the rulemaking process. Section III(E) of the OOOOc supplemental proposal states that “*the EPA proposes to find that cost-effectiveness values up to \$5,540/ton of VOC reduction are reasonable for controls that we have identified as BSER and within the range of what the EPA has historically considered to represent cost effective controls for the reduction of VOC emissions.*”

Table 25 in EG OOOOc supplemental proposal indicates electric grid operated controllers are the only cost-effective pneumatic controller system for VOC emissions at large, new transmission and storage

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facilities. However, the Facility is an existing source and Table 28 in EG 0000c supplemental proposal indicates that the replacement of pneumatic controllers at existing facilities is only cost-effective for control of methane and not VOC. Therefore, the replacement of existing pneumatic controllers with zero emission controllers would not be considered RACT for VOC at the Facility.

### **Blowdown Permit Limitation Example**

During the February 24, 2023 meeting the regulatory precedent for permit limitations addressing blowdown VOC emissions was discussed. CTDEEP requested Algonquin provide examples of blowdown VOC permit limitations at other compressor stations. Compressor stations blowdown VOC emission limitations are contained in Section D(VII)(c) of the Title V Operating Permit for the Perulack Compressor Station in Pennsylvania provided as Attachment 1. In lieu of a permit limitation, Enbridge will commit to developing a blowdown management plan.

**ATTACHMENT 1: PERULACK COMPRESSOR  
STATION TITLE V PERMIT 34-05002**



COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
AIR QUALITY PROGRAM

**TITLE V/STATE OPERATING PERMIT**

Issue Date: February 22, 2019

Effective Date: March 1, 2019

Expiration Date: February 29, 2024

In accordance with the provisions of the Air Pollution Control Act, the Act of January 8, 1960, P.L. 2119, as amended, and 25 Pa. Code Chapter 127, the Owner, [and Operator if noted] (hereinafter referred to as permittee) identified below is authorized by the Department of Environmental Protection (Department) to operate the air emission source(s) more fully described in this permit. This Facility is subject to all terms and conditions specified in this permit. Nothing in this permit relieves the permittee from its obligations to comply with all applicable Federal, State and Local laws and regulations.

The regulatory or statutory authority for each permit condition is set forth in brackets. All terms and conditions in this permit are federally enforceable applicable requirements unless otherwise designated as "State-Only" or "non-applicable" requirements.

**TITLE V Permit No: 34-05002**

Federal Tax Id - Plant Code: 72-0378240-6

**Owner Information**

Name: TEXAS EASTERN TRANS LP  
Mailing Address: PO BOX 1642  
HOUSTON, TX 77251-1642

**Plant Information**

Plant: TEXAS EASTERN TRANS LP/PERULACK STA  
Location: 34 Juniata County 34906 Lack Township  
SIC Code: 4922 Trans. & Utilities - Natural Gas Transmission

**Responsible Official**

Name: THOMAS V. WOODEN, JR.  
Title: VP  
Phone (713) 627 - 5300

**Permit Contact Person**

Name: PHILLIP WIEDENFELD  
Title: ENVRO SUPERVISOR  
Phone: (713) 627 - 6608

[Signature]

*William R. Weaver*

WILLIAM R. WEAVER, SOUTHCENTRAL REGION AIR PROGRAM MANAGER

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Note: These same sub-sections are repeated for each source!

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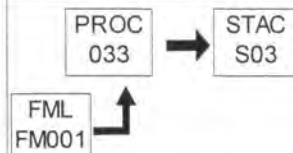
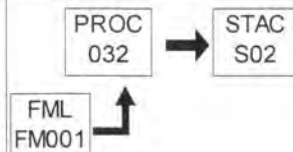
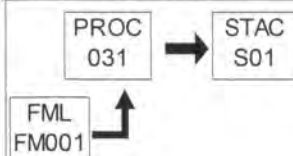
- F-I: Restrictions
- F-II: Testing Requirements
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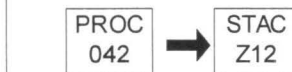
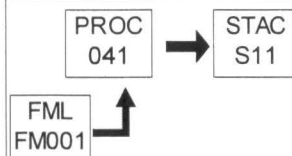
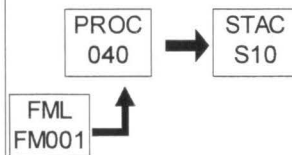
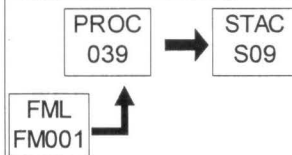
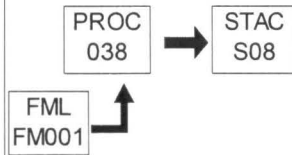
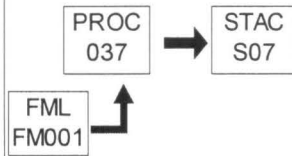
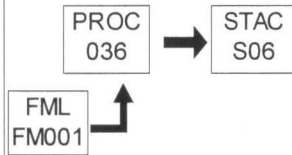
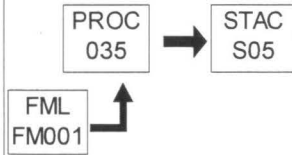
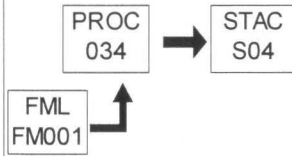
**SECTION A. Site Inventory List**

Source ID	Source Name	Capacity/Throughput	Fuel/Material
031	COOP ENG 1 (31501/1100HP)	9.500 MCF/HR	Natural Gas
032	COOP ENG 2 (31502/1100HP)	9.500 MCF/HR	Natural Gas
033	COOP ENG 3 (31503/1100HP)	9.500 MCF/HR	Natural Gas
034	DC TURB 1 (31401 /ISO 5800HP)	58.900 MCF/HR	Natural Gas
035	DC TURB 2 (31402 /ISO 5800HP)	58.900 MCF/HR	Natural Gas
036	DC TURB 3 (31403 /ISO 5800HP)	58.900 MCF/HR	Natural Gas
037	GE TURB (31404/19,800HP)	235.000 MCF/HR	Natural Gas
038	SOLAR TURB (32701/4785HP)	51.500 MCF/HR	Natural Gas
039	CATERPILLAR EMER GEN (32735) / 618 HP	6.729 MCF/HR	Natural Gas
040	WAUKESHA EMER GEN (31436) / 600 HP	6.197 MCF/HR	Natural Gas
041	LEROI L-3460 EMER GEN (31435) / 600 HP	6.050 MCF/HR	Natural Gas
042	AREA FUGITIVE EMISSIONS		
FM001	NATURAL GAS PIPELINE		
S01	STACK (31501)		
S02	STACK (31502)		
S03	STACK (31503)		
S04	STACK (31401)		
S05	STACK (31402)		
S06	STACK (31403)		
S07	STACK (31404)		
S08	STACK (32701)		
S09	STACK (32735)		
S10	STACK (31436)		
S11	STACK (31435)		
Z12	FUGITIVE EMISSIONS		

**PERMIT MAPS**



## PERMIT MAPS





**SECTION B. General Title V Requirements**

#001	[25 Pa. Code § 121.1]
<b>Definitions</b>	
Words and terms that are not otherwise defined in this permit shall have the meanings set forth in Section 3 of the Air Pollution Control Act (35 P.S. § 4003) and 25 Pa. Code § 121.1.	
#002	[25 Pa. Code § 121.7]
<b>Prohibition of Air Pollution</b>	
No person may permit air pollution as that term is defined in the act.	
#003	[25 Pa. Code § 127.512(c)(4)]
<b>Property Rights</b>	
This permit does not convey property rights of any sort, or any exclusive privileges.	
#004	[25 Pa. Code § 127.446(a) and (c)]
<b>Permit Expiration</b>	
This operating permit is issued for a fixed term of five (5) years and shall expire on the date specified on Page 1 of this permit. The terms and conditions of the expired permit shall automatically continue pending issuance of a new Title V permit, provided the permittee has submitted a timely and complete application and paid applicable fees required under 25 Pa. Code Chapter 127, Subchapter I and the Department is unable, through no fault of the permittee, to issue or deny a new permit before the expiration of the previous permit. An application is complete if it contains sufficient information to begin processing the application, has the applicable sections completed and has been signed by a responsible official.	
#005	[25 Pa. Code §§ 127.412, 127.413, 127.414, 127.446(e) & 127.503]
<b>Permit Renewal</b>	
(a) An application for the renewal of the Title V permit shall be submitted to the Department at least six (6) months, and not more than 18 months, before the expiration date of this permit. The renewal application is timely if a complete application is submitted to the Department's Regional Air Manager within the timeframe specified in this permit condition.	
(b) The application for permit renewal shall include the current permit number, the appropriate permit renewal fee, a description of any permit revisions and off-permit changes that occurred during the permit term, and any applicable requirements that were promulgated and not incorporated into the permit during the permit term.	
(c) The renewal application shall also include submission of proof that the local municipality and county, in which the facility is located, have been notified in accordance with 25 Pa. Code § 127.413. The application for renewal of the Title V permit shall also include submission of compliance review forms which have been used by the permittee to update information submitted in accordance with either 25 Pa. Code § 127.412(b) or § 127.412(j).	
(d) The permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information during the permit renewal process. The permittee shall also promptly provide additional information as necessary to address any requirements that become applicable to the source after the date a complete renewal application was submitted but prior to release of a draft permit.	
#006	[25 Pa. Code §§ 127.450(a)(4) & 127.464(a)]
<b>Transfer of Ownership or Operational Control</b>	
(a) In accordance with 25 Pa. Code § 127.450(a)(4), a change in ownership or operational control of the source shall be treated as an administrative amendment if:	
(1) The Department determines that no other change in the permit is necessary;	
(2) A written agreement has been submitted to the Department identifying the specific date of the transfer of permit responsibility, coverage and liability between the current and the new permittee; and,	
(3) A compliance review form has been submitted to the Department and the permit transfer has been approved by the Department.	

**SECTION B. General Title V Requirements**

(b) In accordance with 25 Pa. Code § 127.464(a), this permit may not be transferred to another person except in cases of transfer-of-ownership which are documented and approved to the satisfaction of the Department.

**#007 [25 Pa. Code § 127.513, 35 P.S. § 4008 and § 114 of the CAA]****Inspection and Entry**

(a) Upon presentation of credentials and other documents as may be required by law for inspection and entry purposes, the permittee shall allow the Department of Environmental Protection or authorized representatives of the Department to perform the following:

- (1) Enter at reasonable times upon the permittee's premises where a Title V source is located or emissions related activity is conducted, or where records are kept under the conditions of this permit;
- (2) Have access to and copy or remove, at reasonable times, records that are kept under the conditions of this permit;
- (3) Inspect at reasonable times, facilities, equipment including monitoring and air pollution control equipment, practices, or operations regulated or required under this permit;
- (4) Sample or monitor, at reasonable times, substances or parameters, for the purpose of assuring compliance with the permit or applicable requirements as authorized by the Clean Air Act, the Air Pollution Control Act, or the regulations promulgated under the Acts.

(b) Pursuant to 35 P.S. § 4008, no person shall hinder, obstruct, prevent or interfere with the Department or its personnel in the performance of any duty authorized under the Air Pollution Control Act.

(c) Nothing in this permit condition shall limit the ability of the EPA to inspect or enter the premises of the permittee in accordance with Section 114 or other applicable provisions of the Clean Air Act.

**#008 [25 Pa. Code §§ 127.25, 127.444, & 127.512(c)(1)]****Compliance Requirements**

(a) The permittee shall comply with the conditions of this permit. Noncompliance with this permit constitutes a violation of the Clean Air Act and the Air Pollution Control Act and is grounds for one (1) or more of the following:

- (1) Enforcement action
- (2) Permit termination, revocation and reissuance or modification
- (3) Denial of a permit renewal application

(b) A person may not cause or permit the operation of a source, which is subject to 25 Pa. Code Article III, unless the source(s) and air cleaning devices identified in the application for the plan approval and operating permit and the plan approval issued to the source are operated and maintained in accordance with specifications in the applications and the conditions in the plan approval and operating permit issued by the Department. A person may not cause or permit the operation of an air contamination source subject to 25 Pa. Code Chapter 127 in a manner inconsistent with good operating practices.

(c) For purposes of Sub-condition (b) of this permit condition, the specifications in applications for plan approvals and operating permits are the physical configurations and engineering design details which the Department determines are essential for the permittee's compliance with the applicable requirements in this Title V permit.

**#009 [25 Pa. Code § 127.512(c)(2)]****Need to Halt or Reduce Activity Not a Defense**

It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

**#010 [25 Pa. Code §§ 127.411(d) & 127.512(c)(5)]****Duty to Provide Information**

(a) The permittee shall furnish to the Department, within a reasonable time, information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit, or

**SECTION B. General Title V Requirements**

to determine compliance with the permit.

(b) Upon request, the permittee shall also furnish to the Department copies of records that the permittee is required to keep by this permit, or for information claimed to be confidential, the permittee may furnish such records directly to the Administrator of EPA along with a claim of confidentiality.

**#011 [25 Pa. Code §§ 127.463, 127.512(c)(3) & 127.542]****Reopening and Revising the Title V Permit for Cause**

(a) This Title V permit may be modified, revoked, reopened and reissued or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay a permit condition.

(b) This permit may be reopened, revised and reissued prior to expiration of the permit under one or more of the following circumstances:

(1) Additional applicable requirements under the Clean Air Act or the Air Pollution Control Act become applicable to a Title V facility with a remaining permit term of three (3) or more years prior to the expiration date of this permit. The Department will revise the permit as expeditiously as practicable but not later than 18 months after promulgation of the applicable standards or regulations. No such revision is required if the effective date of the requirement is later than the expiration date of this permit, unless the original permit or its terms and conditions has been extended.

(2) Additional requirements, including excess emissions requirements, become applicable to an affected source under the acid rain program. Upon approval by the Administrator of EPA, excess emissions offset plans for an affected source shall be incorporated into the permit.

(3) The Department or the EPA determines that this permit contains a material mistake or inaccurate statements were made in establishing the emissions standards or other terms or conditions of this permit.

(4) The Department or the Administrator of EPA determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

(c) Proceedings to revise this permit shall follow the same procedures which apply to initial permit issuance and shall affect only those parts of this permit for which cause to revise exists. The revision shall be made as expeditiously as practicable.

(d) Regardless of whether a revision is made in accordance with (b)(1) above, the permittee shall meet the applicable standards or regulations promulgated under the Clean Air Act within the time frame required by standards or regulations.

**#012 [25 Pa. Code § 127.543]****Reopening a Title V Permit for Cause by EPA**

As required by the Clean Air Act and regulations adopted thereunder, this permit may be modified, reopened and reissued, revoked or terminated for cause by EPA in accordance with procedures specified in 25 Pa. Code § 127.543.

**#013 [25 Pa. Code § 127.522(a)]****Operating Permit Application Review by the EPA**

The applicant may be required by the Department to provide a copy of the permit application, including the compliance plan, directly to the Administrator of the EPA. Copies of title V permit applications to EPA, pursuant to 25 PA Code §127.522(a), shall be submitted, if required, to the following EPA e-mail box

R3\_Air\_Apps\_and\_Notices@epa.gov

Please place the following in the subject line: TV [permit number], [Facility Name].

**#014 [25 Pa. Code § 127.541]****Significant Operating Permit Modifications**

When permit modifications during the term of this permit do not qualify as minor permit modifications or administrative amendments, the permittee shall submit an application for significant Title V permit modifications in accordance with

**SECTION B. General Title V Requirements**

25 Pa. Code § 127.541. Notifications to EPA, pursuant to 25 PA Code §127.522(a), if required, shall be submitted, to the following EPA e-mail box:

R3\_Air\_Apps\_and\_Notices@epa.gov

Please place the following in the subject line: TV [permit number], [Facility Name].

**#015 [25 Pa. Code §§ 121.1 & 127.462]****Minor Operating Permit Modifications**

The permittee may make minor operating permit modifications (as defined in 25 Pa. Code §121.1), on an expedited basis, in accordance with 25 Pa. Code §127.462 (relating to minor operating permit modifications). Notifications to EPA, pursuant to 25 PA Code §127.462(c), if required, shall be submitted, to the following EPA e-mail box:

R3\_Air\_Apps\_and\_Notices@epa.gov

Please place the following in the subject line: TV [permit number], [Facility Name].

**#016 [25 Pa. Code § 127.450]****Administrative Operating Permit Amendments**

(a) The permittee may request administrative operating permit amendments, as defined in 25 Pa. Code §127.450(a). Copies of request for administrative permit amendment to EPA, pursuant to 25 PA Code §127.450(c)(1), if required, shall be submitted to the following EPA e-mail box:

R3\_Air\_Apps\_and\_Notices@epa.gov

Please place the following in the subject line: TV [permit number], [Facility Name].

(b) Upon final action by the Department granting a request for an administrative operating permit amendment covered under §127.450(a)(5), the permit shield provisions in 25 Pa. Code § 127.516 (relating to permit shield) shall apply to administrative permit amendments incorporated in this Title V Permit in accordance with §127.450(c), unless precluded by the Clean Air Act or the regulations thereunder.

**#017 [25 Pa. Code § 127.512(b)]****Severability Clause**

The provisions of this permit are severable, and if any provision of this permit is determined by the Environmental Hearing Board or a court of competent jurisdiction, or US EPA to be invalid or unenforceable, such a determination will not affect the remaining provisions of this permit.

**#018 [25 Pa. Code §§ 127.704, 127.705 & 127.707]****Fee Payment**

(a) The permittee shall pay fees to the Department in accordance with the applicable fee schedules in 25 Pa. Code Chapter 127, Subchapter I (relating to plan approval and operating permit fees).

(b) Emission Fees. The permittee shall, on or before September 1st of each year, pay applicable annual Title V emission fees for emissions occurring in the previous calendar year as specified in 25 Pa. Code § 127.705. The permittee is not required to pay an emission fee for emissions of more than 4,000 tons of each regulated pollutant emitted from the facility.

(c) As used in this permit condition, the term "regulated pollutant" is defined as a VOC, each pollutant regulated under Sections 111 and 112 of the Clean Air Act and each pollutant for which a National Ambient Air Quality Standard has been promulgated, except that carbon monoxide is excluded.

(d) Late Payment. Late payment of emission fees will subject the permittee to the penalties prescribed in 25 Pa. Code § 127.707 and may result in the suspension or termination of the Title V permit. The permittee shall pay a penalty of fifty percent (50%) of the fee amount, plus interest on the fee amount computed in accordance with 26 U.S.C.A. § 6621(a)(2) from the date the emission fee should have been paid in accordance with the time frame specified in 25 Pa. Code § 127.705(c).

**SECTION B. General Title V Requirements**

(e) The permittee shall pay an annual operating permit administration fee according to the fee schedule established in 25 Pa. Code § 127.704(c) if the facility, identified in Subparagraph (iv) of the definition of the term "Title V facility" in 25 Pa. Code § 121.1, is subject to Title V after the EPA Administrator completes a rulemaking requiring regulation of those sources under Title V of the Clean Air Act.

(f) This permit condition does not apply to a Title V facility which qualifies for exemption from emission fees under 35 P.S. § 4006.3(f).

**#019 [25 Pa. Code §§ 127.14(b) & 127.449]****Authorization for De Minimis Emission Increases**

(a) This permit authorizes de minimis emission increases from a new or existing source in accordance with 25 Pa. Code §§ 127.14 and 127.449 without the need for a plan approval or prior issuance of a permit modification. The permittee shall provide the Department with seven (7) days prior written notice before commencing any de minimis emissions increase that would result from either: (1) a physical change of minor significance under § 127.14(c)(1); or (2) the construction, installation, modification or reactivation of an air contamination source. The written notice shall:

(1) Identify and describe the pollutants that will be emitted as a result of the de minimis emissions increase.

(2) Provide emission rates expressed in tons per year and in terms necessary to establish compliance consistent with any applicable requirement.

The Department may disapprove or condition de minimis emission increases at any time.

(b) Except as provided below in (c) and (d) of this permit condition, the permittee is authorized during the term of this permit to make de minimis emission increases (expressed in tons per year) up to the following amounts without the need for a plan approval or prior issuance of a permit modification:

(1) Four tons of carbon monoxide from a single source during the term of the permit and 20 tons of carbon monoxide at the facility during the term of the permit.

(2) One ton of NO<sub>x</sub> from a single source during the term of the permit and 5 tons of NO<sub>x</sub> at the facility during the term of the permit.

(3) One and six-tenths tons of the oxides of sulfur from a single source during the term of the permit and 8.0 tons of oxides of sulfur at the facility during the term of the permit.

(4) Six-tenths of a ton of PM<sub>10</sub> from a single source during the term of the permit and 3.0 tons of PM<sub>10</sub> at the facility during the term of the permit. This shall include emissions of a pollutant regulated under Section 112 of the Clean Air Act unless precluded by the Clean Air Act or 25 Pa. Code Article III.

(5) One ton of VOCs from a single source during the term of the permit and 5.0 tons of VOCs at the facility during the term of the permit. This shall include emissions of a pollutant regulated under Section 112 of the Clean Air Act unless precluded by the Clean Air Act or 25 Pa. Code Article III.

(c) In accordance with § 127.14, the permittee may install the following minor sources without the need for a plan approval:

(1) Air conditioning or ventilation systems not designed to remove pollutants generated or released from other sources.

(2) Combustion units rated at 2,500,000 or less Btu per hour of heat input.

(3) Combustion units with a rated capacity of less than 10,000,000 Btu per hour heat input fueled by natural gas supplied by a public utility, liquefied petroleum gas or by commercial fuel oils which are No. 2 or lighter, viscosity less than or equal to 5.82 c St, and which meet the sulfur content requirements of 25 Pa. Code § 123.22 (relating to combustion units). For purposes of this permit, commercial fuel oil shall be virgin oil which has no reprocessed, recycled or waste material added.

(4) Space heaters which heat by direct heat transfer.

**SECTION B. General Title V Requirements**

(5) Laboratory equipment used exclusively for chemical or physical analysis.

(6) Other sources and classes of sources determined to be of minor significance by the Department.

(d) This permit does not authorize de minimis emission increases if the emissions increase would cause one or more of the following:

(1) Increase the emissions of a pollutant regulated under Section 112 of the Clean Air Act except as authorized in Subparagraphs (b)(4) and (5) of this permit condition.

(2) Subject the facility to the prevention of significant deterioration requirements in 25 Pa. Code Chapter 127, Subchapter D and/or the new source review requirements in Subchapter E.

(3) Violate any applicable requirement of the Air Pollution Control Act, the Clean Air Act, or the regulations promulgated under either of the acts.

(4) Changes which are modifications under any provision of Title I of the Clean Air Act and emission increases which would exceed the allowable emissions level (expressed as a rate of emissions or in terms of total emissions) under the Title V permit.

(e) Unless precluded by the Clean Air Act or the regulations thereunder, the permit shield described in 25 Pa. Code § 127.516 (relating to permit shield) shall extend to the changes made under 25 Pa. Code § 127.449 (relating to de minimis emission increases).

(f) Emissions authorized under this permit condition shall be included in the monitoring, recordkeeping and reporting requirements of this permit.

(g) Except for de minimis emission increases allowed under this permit, 25 Pa. Code § 127.449, or sources and physical changes meeting the requirements of 25 Pa. Code § 127.14, the permittee is prohibited from making physical changes or engaging in activities that are not specifically authorized under this permit without first applying for a plan approval. In accordance with § 127.14(b), a plan approval is not required for the construction, modification, reactivation, or installation of the sources creating the de minimis emissions increase.

(h) The permittee may not meet de minimis emission threshold levels by offsetting emission increases or decreases at the same source.

**#020 [25 Pa. Code §§ 127.11a & 127.215]****Reactivation of Sources**

(a) The permittee may reactivate a source at the facility that has been out of operation or production for at least one year, but less than or equal to five (5) years, if the source is reactivated in accordance with the requirements of 25 Pa. Code §§ 127.11a and 127.215. The reactivated source will not be considered a new source.

(b) A source which has been out of operation or production for more than five (5) years but less than 10 years may be reactivated and will not be considered a new source if the permittee satisfies the conditions specified in 25 Pa. Code § 127.11a(b).

**#021 [25 Pa. Code §§ 121.9 & 127.216]****Circumvention**

(a) The owner of this Title V facility, or any other person, may not circumvent the new source review requirements of 25 Pa. Code Chapter 127, Subchapter E by causing or allowing a pattern of ownership or development, including the phasing, staging, delaying or engaging in incremental construction, over a geographic area of a facility which, except for the pattern of ownership or development, would otherwise require a permit or submission of a plan approval application.

(b) No person may permit the use of a device, stack height which exceeds good engineering practice stack height, dispersion technique or other technique which, without resulting in reduction of the total amount of air contaminants emitted, conceals or dilutes an emission of air contaminants which would otherwise be in violation of this permit, the Air Pollution Control Act or the regulations promulgated thereunder, except that with prior approval of the Department,

**SECTION B. General Title V Requirements**

the device or technique may be used for control of malodors.

**#022 [25 Pa. Code §§ 127.402(d) & 127.513(1)]****Submissions**

(a) Reports, test data, monitoring data, notifications and requests for renewal of the permit shall be submitted to the:

Regional Air Program Manager  
PA Department of Environmental Protection  
(At the address given on the permit transmittal letter,  
or otherwise notified)

(b) Any report or notification for the EPA Administrator or EPA Region III should be addressed to:

Office of Air Enforcement and Compliance Assistance (3AP20)  
United States Environmental Protection Agency  
Region 3  
1650 Arch Street  
Philadelphia, PA 19103-2029

(c) An application, form, report or compliance certification submitted pursuant to this permit condition shall contain certification by a responsible official as to truth, accuracy, and completeness as required under 25 Pa. Code § 127.402(d). Unless otherwise required by the Clean Air Act or regulations adopted thereunder, this certification and any other certification required pursuant to this permit shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

**#023 [25 Pa. Code §§ 127.441(c) & 127.463(e); Chapter 139; & 114(a)(3), 504(b) of the CAA]****Sampling, Testing and Monitoring Procedures**

(a) The permittee shall perform the emissions monitoring and analysis procedures or test methods for applicable requirements of this Title V permit. In addition to the sampling, testing and monitoring procedures specified in this permit, the Permittee shall comply with any additional applicable requirements promulgated under the Clean Air Act after permit issuance regardless of whether the permit is revised.

(b) The sampling, testing and monitoring required under the applicable requirements of this permit, shall be conducted in accordance with the requirements of 25 Pa. Code Chapter 139 unless alternative methodology is required by the Clean Air Act (including §§ 114(a)(3) and 504(b)) and regulations adopted thereunder.

**#024 [25 Pa. Code §§ 127.511 & Chapter 135]****Recordkeeping Requirements**

(a) The permittee shall maintain and make available, upon request by the Department, records of required monitoring information that include the following:

- (1) The date, place (as defined in the permit) and time of sampling or measurements.
- (2) The dates the analyses were performed.
- (3) The company or entity that performed the analyses.
- (4) The analytical techniques or methods used.
- (5) The results of the analyses.
- (6) The operating conditions as existing at the time of sampling or measurement.

(b) The permittee shall retain records of the required monitoring data and supporting information for at least five (5) years from the date of the monitoring sample, measurement, report or application. Supporting information includes the calibration data and maintenance records and original strip-chart recordings for continuous monitoring instrumentation, and copies of reports required by the permit.

**SECTION B. General Title V Requirements**

(c) The permittee shall maintain and make available to the Department upon request, records including computerized records that may be necessary to comply with the reporting, recordkeeping and emission statement requirements in 25 Pa. Code Chapter 135 (relating to reporting of sources). In accordance with 25 Pa. Code Chapter 135, § 135.5, such records may include records of production, fuel usage, maintenance of production or pollution control equipment or other information determined by the Department to be necessary for identification and quantification of potential and actual air contaminant emissions. If direct recordkeeping is not possible or practical, sufficient records shall be kept to provide the needed information by indirect means.

**#025 [25 Pa. Code §§ 127.411(d), 127.442, 127.463(e) & 127.511(c)]****Reporting Requirements**

(a) The permittee shall comply with the reporting requirements for the applicable requirements specified in this Title V permit. In addition to the reporting requirements specified herein, the permittee shall comply with any additional applicable reporting requirements promulgated under the Clean Air Act after permit issuance regardless of whether the permit is revised.

(b) Pursuant to 25 Pa. Code § 127.511(c), the permittee shall submit reports of required monitoring at least every six (6) months unless otherwise specified in this permit. Instances of deviations (as defined in 25 Pa. Code § 121.1) from permit requirements shall be clearly identified in the reports. The reporting of deviations shall include the probable cause of the deviations and corrective actions or preventative measures taken, except that sources with continuous emission monitoring systems shall report according to the protocol established and approved by the Department for the source. The required reports shall be certified by a responsible official.

(c) Every report submitted to the Department under this permit condition shall comply with the submission procedures specified in Section B, Condition #022(c) of this permit.

(d) Any records, reports or information obtained by the Department or referred to in a public hearing shall be made available to the public by the Department except for such records, reports or information for which the permittee has shown cause that the documents should be considered confidential and protected from disclosure to the public under Section 4013.2 of the Air Pollution Control Act and consistent with Sections 112(d) and 114(c) of the Clean Air Act and 25 Pa. Code § 127.411(d). The permittee may not request a claim of confidentiality for any emissions data generated for the Title V facility.

**#026 [25 Pa. Code § 127.513]****Compliance Certification**

(a) One year after the date of issuance of the Title V permit, and each year thereafter, unless specified elsewhere in the permit, the permittee shall submit to the Department and EPA Region III a certificate of compliance with the terms and conditions in this permit, for the previous year, including the emission limitations, standards or work practices. This certification shall include:

- (1) The identification of each term or condition of the permit that is the basis of the certification.
- (2) The compliance status.
- (3) The methods used for determining the compliance status of the source, currently and over the reporting period.
- (4) Whether compliance was continuous or intermittent.

(b) The compliance certification shall be postmarked or hand-delivered no later than thirty days after each anniversary of the date of issuance of this Title V Operating Permit, or on the submittal date specified elsewhere in the permit, to the Department and EPA in accordance with the submission requirements specified in condition #022 of this section.

**#027 [25 Pa. Code § 127.3]****Operational Flexibility**

The permittee is authorized to make changes within the Title V facility in accordance with the following provisions in 25 Pa. Code Chapter 127 which implement the operational flexibility requirements of Section 502(b)(10) of the Clean Air Act and Section 6.1(i) of the Air Pollution Control Act:

- (1) Section 127.14 (relating to exemptions)



**SECTION B. General Title V Requirements**

- (2) Section 127.447 (relating to alternative operating scenarios)
- (3) Section 127.448 (relating to emissions trading at facilities with federally enforceable emissions caps)
- (4) Section 127.449 (relating to de minimis emission increases)
- (5) Section 127.450 (relating to administrative operating permit amendments)
- (6) Section 127.462 (relating to minor operating permit amendments)
- (7) Subchapter H (relating to general plan approvals and operating permits)

**#028 [25 Pa. Code §§ 127.441(d), 127.512(i) and 40 CFR Part 68]****Risk Management**

- (a) If required by Section 112(r) of the Clean Air Act, the permittee shall develop and implement an accidental release program consistent with requirements of the Clean Air Act, 40 CFR Part 68 (relating to chemical accident prevention provisions) and the Federal Chemical Safety Information, Site Security and Fuels Regulatory Relief Act (P.L. 106-40).
- (b) The permittee shall prepare and implement a Risk Management Plan (RMP) which meets the requirements of Section 112(r) of the Clean Air Act, 40 CFR Part 68 and the Federal Chemical Safety Information, Site Security and Fuels Regulatory Relief Act when a regulated substance listed in 40 CFR § 68.130 is present in a process in more than the listed threshold quantity at the Title V facility. The permittee shall submit the RMP to the federal Environmental Protection Agency according to the following schedule and requirements:
- (1) The permittee shall submit the first RMP to a central point specified by EPA no later than the latest of the following:
    - (i) Three years after the date on which a regulated substance is first listed under § 68.130; or,
    - (ii) The date on which a regulated substance is first present above a threshold quantity in a process.
  - (2) The permittee shall submit any additional relevant information requested by the Department or EPA concerning the RMP and shall make subsequent submissions of RMPs in accordance with 40 CFR § 68.190.
  - (3) The permittee shall certify that the RMP is accurate and complete in accordance with the requirements of 40 CFR Part 68, including a checklist addressing the required elements of a complete RMP.
- (c) As used in this permit condition, the term "process" shall be as defined in 40 CFR § 68.3. The term "process" means any activity involving a regulated substance including any use, storage, manufacturing, handling, or on-site movement of such substances or any combination of these activities. For purposes of this definition, any group of vessels that are interconnected, or separate vessels that are located such that a regulated substance could be involved in a potential release, shall be considered a single process.
- (d) If the Title V facility is subject to 40 CFR Part 68, as part of the certification required under this permit, the permittee shall:
- (1) Submit a compliance schedule for satisfying the requirements of 40 CFR Part 68 by the date specified in 40 CFR § 68.10(a); or,
  - (2) Certify that the Title V facility is in compliance with all requirements of 40 CFR Part 68 including the registration and submission of the RMP.
- (e) If the Title V facility is subject to 40 CFR Part 68, the permittee shall maintain records supporting the implementation of an accidental release program for five (5) years in accordance with 40 CFR § 68.200.
- (f) When the Title V facility is subject to the accidental release program requirements of Section 112(r) of the Clean Air Act and 40 CFR Part 68, appropriate enforcement action will be taken by the Department if:
- (1) The permittee fails to register and submit the RMP or a revised plan pursuant to 40 CFR Part 68.

**SECTION B. General Title V Requirements**

(2) The permittee fails to submit a compliance schedule or include a statement in the compliance certification required under Condition #26 of Section B of this Title V permit that the Title V facility is in compliance with the requirements of Section 112(r) of the Clean Air Act, 40 CFR Part 68, and 25 Pa. Code § 127.512(i).

**#029 [25 Pa. Code § 127.512(e)]****Approved Economic Incentives and Emission Trading Programs**

No permit revision shall be required under approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this Title V permit.

**#030 [25 Pa. Code §§ 127.516, 127.450(d), 127.449(f) & 127.462(g)]****Permit Shield**

(a) The permittee's compliance with the conditions of this permit shall be deemed in compliance with applicable requirements (as defined in 25 Pa. Code § 121.1) as of the date of permit issuance if either of the following applies:

(1) The applicable requirements are included and are specifically identified in this permit.

(2) The Department specifically identifies in the permit other requirements that are not applicable to the permitted facility or source.

(b) Nothing in 25 Pa. Code § 127.516 or the Title V permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act, including the authority of the Administrator of the EPA provided thereunder.

(2) The liability of the permittee for a violation of an applicable requirement prior to the time of permit issuance.

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act.

(4) The ability of the EPA to obtain information from the permittee under Section 114 of the Clean Air Act.

(c) Unless precluded by the Clean Air Act or regulations thereunder, final action by the Department incorporating a significant permit modification in this Title V Permit shall be covered by the permit shield at the time that the permit containing the significant modification is issued.

**SECTION C. Site Level Requirements****I. RESTRICTIONS.****Emission Restriction(s).****# 001 [25 Pa. Code §123.1]****Prohibition of certain fugitive emissions**

The permittee shall not allow the emission into the outdoor atmosphere of any fugitive air contaminant from a source other than the following:

- (1) Construction or demolition of buildings or structures.
- (2) Grading, paving and maintenance of roads and streets.
- (3) Use of roads and streets. Emissions from material in or on trucks, railroad cars and other vehicular equipment are not considered as emissions from use of roads and streets.
- (4) Clearing of land.
- (5) Stockpiling of materials.
- (6) Open burning operations.
- (7) Sources and classes of sources other than those identified above, for which the operator has obtained a determination from the Department that fugitive emissions from the source, after appropriate control, meet the following requirements:
  - a) The emissions are of minor significance with respect to causing air pollution;
  - b) The emissions are not preventing or interfering with the attainment or maintenance of any ambient air standard.

**# 002 [25 Pa. Code §123.2]****Fugitive particulate matter**

The permittee shall not allow the emission of fugitive particulate matter into the outdoor atmosphere from a source specified in Section C, Condition #001, if the emissions are visible at the point the emissions pass outside the permittee's property.

**# 003 [25 Pa. Code §123.31]****Limitations**

The permittee shall not allow the emission into the outdoor atmosphere of any malodorous air contaminants from any source in such a manner that the malodors are detectable outside the permittee's property.

**# 004 [25 Pa. Code §123.41]****Limitations**

The permittee shall not permit the emission into the outdoor atmosphere of visible air contaminants in such a manner that the opacity of the emission is either of the following:

- (1) Equal to or greater than 20 percent for a period or periods aggregating more than three minutes in any one hour.
- (2) Equal to or greater than 60 percent at any time.

**# 005 [25 Pa. Code §123.42]****Exceptions**

The emission limitations of 123.41 shall not apply when:

- (1) The presence of uncombined water is the only reason for failure of the emission to meet the limitation;
- (2) The emission results from the operation of equipment used solely to train and test persons in observing the opacity of visible emissions;
- (3) The emission results from sources specified in Section C, Condition #001.

**SECTION C. Site Level Requirements****II. TESTING REQUIREMENTS.****# 006 [25 Pa. Code §139.1]****Sampling facilities.**

Upon the request of the Department, the permittee shall provide adequate sampling ports, safe sampling platforms and adequate utilities for the performance by the Department of tests on such sources. In the request, the Department will set forth the time period in which the facilities shall be provided as well as the specifications for such facilities.

**# 007 [25 Pa. Code §139.11]****General requirements.**

(1) As specified in 25 Pa. Code Section 139.11(1), performance tests shall be conducted while the source is operating at maximum routine operating conditions or under such other conditions, within the capacity of the equipment, as may be requested by the Department.

(2) As specified in 25 Pa. Code Section 139.11(2), the Department will consider test results for approval where sufficient information is provided to verify the source conditions existing at the time of the test and where adequate data is available to show the manner in which the test was conducted. Information submitted to the Department shall include, at a minimum, all of the following:

- (a) A thorough source description, including a description of any air cleaning devices and the flue.
- (b) Process conditions, for example, the throughput rate of production, and other conditions, which may affect emissions from the process.
- (c) The location of the sampling ports.
- (d) Effluent characteristics, including velocity, temperature, moisture content, gas density (percentage CO, CO<sub>2</sub> and O<sub>2</sub>), static and barometric pressures.
- (e) Sample collection techniques employed, including procedures used, equipment descriptions, and data to verify that isokinetic sampling for particulate matter collection occurred and that acceptable test conditions were met.
- (f) Laboratory procedures and results.
- (g) Calculated results.

**III. MONITORING REQUIREMENTS.****# 008 [25 Pa. Code §123.43]****Measuring techniques**

Visible air contaminants may be measured using either of the following:

- (1) A device approved by the Department and maintained to provide accurate opacity measurements.
- (2) Observers, trained and certified in EPA Method 9 to measure plume opacity with the naked eye or with the aid of any device(s) approved by the Department.

**# 009 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall conduct weekly inspection during regular business workdays around the plant periphery during the daylight hours when the plant is in production to detect visible emissions, fugitive visible emissions and malodorous air contaminants. Weekly inspections are necessary to determine:

- (1) Visible emissions in excess of the limits stated in Section C, Condition # 004. Visible emissions may be measured according to the methods specified in Section C, Condition # 008. Alternately, plant personnel who observe such visible emissions shall report each incident to the Department within two hours of the occurrence and arrange for a certified observer to read the visible emissions.
- (2) Presence of fugitive emissions beyond the plant property boundaries, as stated in Section C, Condition # 002.

**SECTION C. Site Level Requirements**

(3) Presence of malodorous air contaminants beyond the plant property boundaries as stated in Section C, Condition # 003.

If the facility becomes unmanned during the term of this operating permit, the company shall notify the Department and the monitoring shall be conducted once a month effective from the date the facility becomes unmanned.

**IV. RECORDKEEPING REQUIREMENTS.****# 010 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall maintain records of weekly inspections referenced in Section C, Condition #009. The records shall include, at a minimum, the following information:

- (1) The name of the company representative monitoring these instances.
- (2) A description of the emissions and/or malodors observed and actions taken to mitigate them.
- (3) The date and time of the observation.
- (4) The wind direction during each observation.

The permittee shall retain these records for a minimum of five years. The records shall be made available to the Department upon request.

**V. REPORTING REQUIREMENTS.****# 011 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall submit the semi-annual monitoring reports for this facility by January 31 and July 31 of each year. The January 31 semi-annual monitoring report shall cover the period from July 1 through December 31. This semi-annual monitoring report may be included in the January 31 Title V Compliance Certification required by Title 25 PA Code Section 127.513. The July 31 semi-annual monitoring report shall cover the period from January 1 through June 30. However, in accordance with Title 25 PA Code Section 127.511(c), in no case shall the semi-annual monitoring report be submitted less often than every six (6) months. This may require that an interim semi-annual monitoring report (covering a period less than six (6) months) be submitted to bring the facility into compliance with this schedule.

**# 012 [25 Pa. Code §127.512]****Operating permit terms and conditions.**

[Additional authority for this permit condition is derived from 25 Pa. Code § 127.511]

The permittee shall report malfunctions which occur at the Title V facility to the Department. As defined in 40 CFR Section 60.2 and incorporated by reference in 25 Pa. Code Chapter 122, a malfunction is any sudden, infrequent, and not reasonably preventable failure of air pollution control equipment, process equipment, or a process to operate in a normal or usual manner. Failures that are caused in part by poor maintenance or careless operation are not malfunctions. Malfunctions shall be reported as follows:

(1) Malfunctions which occur at the Title V facility and which pose an imminent danger to public health, safety, welfare and the environment, shall be immediately reported to the Department by telephone. Telephone reports can be made to the Air Quality Program Altoona District Office at 814-946-7290 during normal business hours or to the Department's Emergency Hotline at 1-866-825-0208. The telephone report of such malfunctions shall occur no later than two hours after the incident. The permittee shall submit a written report of instances of such malfunctions to the Department within three days of the telephone report.

(2) Unless otherwise required by this permit, any other malfunction that is not subject to the reporting requirements of subsection (1), above, shall be reported to the Department, in writing, within five days of discovery of the malfunction.

**SECTION C. Site Level Requirements****# 013 [25 Pa. Code §135.3]****Reporting**

(1) The permittee shall submit an annual emissions report including the fuel usage and operating hours of the sources to the Department. The report for a given calendar year is due no later than March 1 of the following year, and shall be submitted to the Air Quality District Supervisor unless otherwise specified.

(2) The permittee may request an extension of time from the Department for filing of the report specified in paragraph (1), above, and the Department may grant the extension for reasonable cause.

**VI. WORK PRACTICE REQUIREMENTS.****# 014 [25 Pa. Code §123.1]****Prohibition of certain fugitive emissions**

The permittee shall take all reasonable actions to prevent particulate matter from becoming airborne from any source specified in Section C, Condition #001. These actions shall include, but are not limited to, the following:

(1) Use, where possible, of water or chemicals for control of dust in the demolition of buildings or structures, construction operations, the grading of roads, or the clearing of land.

(2) Application of asphalt, oil, water or suitable chemicals on dirt roads, material stockpiles and other surfaces which may give rise to airborne dusts.

(3) Paving and maintenance of roadways.

(4) Prompt removal of earth or other material from paved streets onto which earth or other material has been transported by trucking or earth moving equipment, erosion by water, or other means [25 Pa. Code Sections 123.1 and 123.2].

**VII. ADDITIONAL REQUIREMENTS.****# 015 [25 Pa. Code §121.7]****Prohibition of air pollution.**

No person may permit air pollution as that term is defined in the PA Air Pollution Control Act.

**# 016 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

In the event that any Federal Subpart referenced in this permit is revised, the permittee shall comply with the revised version of the subpart, and shall not be required to comply with any provisions in this permit designated as having the subpart as their authority, to the extent that such permit provisions would be inconsistent with the applicable provisions of the revised subpart.

**# 017 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

Per Site Level Category VIII COMPLIANCE CERTIFICATION below, forward EPA the annual compliance certification report electronically, in lieu of a hard copy version, to the email address: 'R3\_APD\_Permits@epa.gov'.

**# 018 [25 Pa. Code §127.511]****Monitoring and related recordkeeping and reporting requirements.**

For natural gas fuel combusted at this site, the owner/operator shall verify compliance with the standards consistent with Federal Energy Regulatory Commission (FERC) requirements.

**# 019 [25 Pa. Code §129.14]****Open burning operations**

(1) The permittee shall not conduct open burning of materials in such a manner that:

(a) The emissions are visible, at any time; at the point such emissions pass outside the permittee's property.

(b) Malodorous air contaminants from the open burning are detectable outside the permittee's property.

**SECTION C. Site Level Requirements**

(c) The emissions interfere with the reasonable enjoyment of life and property.

(d) The emissions cause damage to vegetation or property.

(e) The emissions are or may be deleterious to human or animal health.

(2) Exceptions. The requirements of Subsection (a) do not apply where the open burning operations result from:

(a) A fire set to prevent or abate a fire hazard, when approved by the Department and set by or under the supervision of a public official.

(b) Any fire set for the purpose of instructing personnel in fire fighting, when approved by the Department.

(c) A fire set for the prevention and control of disease or pests, when approved by the Department.

(d) A fire set solely for recreational or ceremonial purposes.

(e) A fire set solely for cooking food.

(3) This permit does not constitute authorization to burn solid waste pursuant to Section 610(3) of the Solid Waste Management Act, 35 P.S. Section 6018.610 (3), or any other provision of the Solid Waste Management Act.

**VIII. COMPLIANCE CERTIFICATION.**

The permittee shall submit within thirty days of 01/01/2019 a certificate of compliance with all permit terms and conditions set forth in this Title V permit as required under condition #026 of section B of this permit, and annually thereafter.

**IX. COMPLIANCE SCHEDULE.**

No compliance milestones exist.

**\*\*\* Permit Shield In Effect \*\*\***

**SECTION D. Source Level Requirements**

Source ID: 031

Source Name: COOP ENG 1 (31501/1100HP)

Source Capacity/Throughput:

9.500 MCF/HR

Natural Gas

Conditions for this source occur in the following groups: SG01

SG06

**I. RESTRICTIONS.****Control Device Efficiency Restriction(s).**

# 001 [25 Pa. Code §127.441]

**Operating permit terms and conditions.**

This IC engine shall be equipped with ignition retard equipment with a minimum retardation set to no less than 2 degrees from OEM recommendation.

**II. TESTING REQUIREMENTS.**

No additional testing requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

**III. MONITORING REQUIREMENTS.**

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

**IV. RECORDKEEPING REQUIREMENTS.**

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

**V. REPORTING REQUIREMENTS.**

No additional reporting requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

**VI. WORK PRACTICE REQUIREMENTS.**

No additional work practice requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

**VII. ADDITIONAL REQUIREMENTS.**

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

**\*\*\* Permit Shield in Effect. \*\*\***



**SECTION D. Source Level Requirements**

Source ID: 032

Source Name: COOP ENG 2 (31502/1100HP)

Source Capacity/Throughput:

9,500 MCF/HR

Natural Gas

Conditions for this source occur in the following groups: SG01  
SG06

**I. RESTRICTIONS.**

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

**II. TESTING REQUIREMENTS.**

No additional testing requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

**III. MONITORING REQUIREMENTS.**

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

**IV. RECORDKEEPING REQUIREMENTS.**

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

**V. REPORTING REQUIREMENTS.**

No additional reporting requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

**VI. WORK PRACTICE REQUIREMENTS.**

No additional work practice requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

**VII. ADDITIONAL REQUIREMENTS.**

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

**\*\*\* Permit Shield in Effect. \*\*\***



**SECTION D. Source Level Requirements**

Source ID: 033      Source Name: COOP ENG 3 (31503/1100HP)  
Source Capacity/Throughput:      9.500 MCF/HR      Natural Gas

Conditions for this source occur in the following groups: SG01  
SG06



**I. RESTRICTIONS.**

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

**II. TESTING REQUIREMENTS.**

No additional testing requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

**III. MONITORING REQUIREMENTS.**

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

**IV. RECORDKEEPING REQUIREMENTS.**

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

**V. REPORTING REQUIREMENTS.**

No additional reporting requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

**VI. WORK PRACTICE REQUIREMENTS.**

No additional work practice requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

**VII. ADDITIONAL REQUIREMENTS.**

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

**\*\*\* Permit Shield in Effect. \*\*\***



**SECTION D. Source Level Requirements**

Source ID: 034      Source Name: DC TURB 1 (31401 /ISO 5800HP)  
Source Capacity/Throughput:      58.900 MCF/HR      Natural Gas

Conditions for this source occur in the following groups: SG02  
SG05  
SG06  
SG07



**I. RESTRICTIONS.**

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

**II. TESTING REQUIREMENTS.**

No additional testing requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

**III. MONITORING REQUIREMENTS.**

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

**IV. RECORDKEEPING REQUIREMENTS.**

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

**V. REPORTING REQUIREMENTS.**

No additional reporting requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

**VI. WORK PRACTICE REQUIREMENTS.**

No additional work practice requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

**VII. ADDITIONAL REQUIREMENTS.**

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

**\*\*\* Permit Shield in Effect. \*\*\***

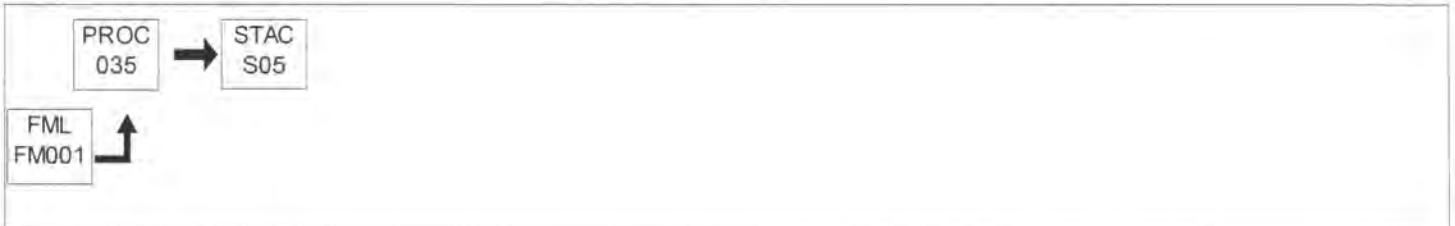
**SECTION D. Source Level Requirements**

Source ID: 035

Source Name: DC TURB 2 (31402 /ISO 5800HP)

Source Capacity/Throughput: 58.900 MCF/HR Natural Gas

Conditions for this source occur in the following groups: SG02  
 SG05  
 SG06  
 SG07

**I. RESTRICTIONS.**

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

**II. TESTING REQUIREMENTS.**

No additional testing requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

**III. MONITORING REQUIREMENTS.**

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

**IV. RECORDKEEPING REQUIREMENTS.**

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

**V. REPORTING REQUIREMENTS.**

No additional reporting requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

**VI. WORK PRACTICE REQUIREMENTS.**

No additional work practice requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

**VII. ADDITIONAL REQUIREMENTS.**

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

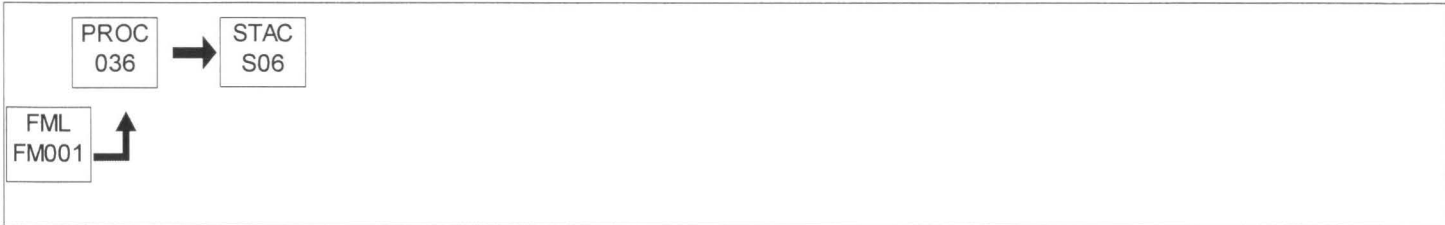
**\*\*\* Permit Shield in Effect. \*\*\***



**SECTION D. Source Level Requirements**

Source ID: 036                      Source Name: DC TURB 3 (31403 /ISO 5800HP)  
Source Capacity/Throughput:            58.900 MCF/HR                      Natural Gas

Conditions for this source occur in the following groups: SG02  
SG05  
SG06  
SG07



**I. RESTRICTIONS.**

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

**II. TESTING REQUIREMENTS.**

No additional testing requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

**III. MONITORING REQUIREMENTS.**

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

**IV. RECORDKEEPING REQUIREMENTS.**

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

**V. REPORTING REQUIREMENTS.**

No additional reporting requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

**VI. WORK PRACTICE REQUIREMENTS.**

No additional work practice requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

**VII. ADDITIONAL REQUIREMENTS.**

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

**\*\*\* Permit Shield in Effect. \*\*\***

**SECTION D. Source Level Requirements**

Source ID: 037

Source Name: GE TURB (31404/19,800HP)

Source Capacity/Throughput: 235.000 MCF/HR Natural Gas

Conditions for this source occur in the following groups: SG06  
SG08**I. RESTRICTIONS.****Emission Restriction(s).**

# 001 [25 Pa. Code §123.13]

**Processes**

The permittee shall not allow the emission into the outdoor atmosphere of Particulate Matter (PM) from this source in a manner that the concentration of PM in the effluent gas exceeds 0.04 grains per dry standard cubic foot.

# 002 [25 Pa. Code §123.21]

**General**

The permittee shall not allow the emission into the outdoor atmosphere of sulfur dioxide from a source in a manner that the concentration of sulfur oxides, expressed as SO<sub>2</sub>, in the effluent gas exceeds 500 parts per million, by volume, dry basis.

**Fuel Restriction(s).**

# 003 [25 Pa. Code §127.441]

**Operating permit terms and conditions.**

The permittee shall operate the gas turbines and the IC engines using natural gas only.

**II. TESTING REQUIREMENTS.**

No additional testing requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

**III. MONITORING REQUIREMENTS.**

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

**IV. RECORDKEEPING REQUIREMENTS.**

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

**V. REPORTING REQUIREMENTS.**

No additional reporting requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

**SECTION D. Source Level Requirements****VI. WORK PRACTICE REQUIREMENTS.**

No additional work practice requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

**VII. ADDITIONAL REQUIREMENTS.**

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

**\*\*\* Permit Shield in Effect. \*\*\***

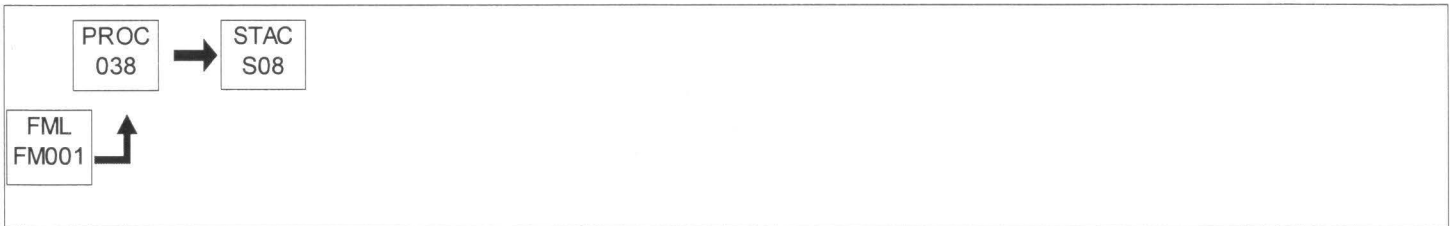
**SECTION D. Source Level Requirements**

Source ID: 038

Source Name: SOLAR TURB (32701/4785HP)

Source Capacity/Throughput: 51.500 MCF/HR Natural Gas

Conditions for this source occur in the following groups: SG02  
 SG05  
 SG06  
 SG07

**I. RESTRICTIONS.**

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

**II. TESTING REQUIREMENTS.**

No additional testing requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

**III. MONITORING REQUIREMENTS.**

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

**IV. RECORDKEEPING REQUIREMENTS.**

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

**V. REPORTING REQUIREMENTS.**

No additional reporting requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

**VI. WORK PRACTICE REQUIREMENTS.**

No additional work practice requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

**VII. ADDITIONAL REQUIREMENTS.**

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

**\*\*\* Permit Shield in Effect. \*\*\***

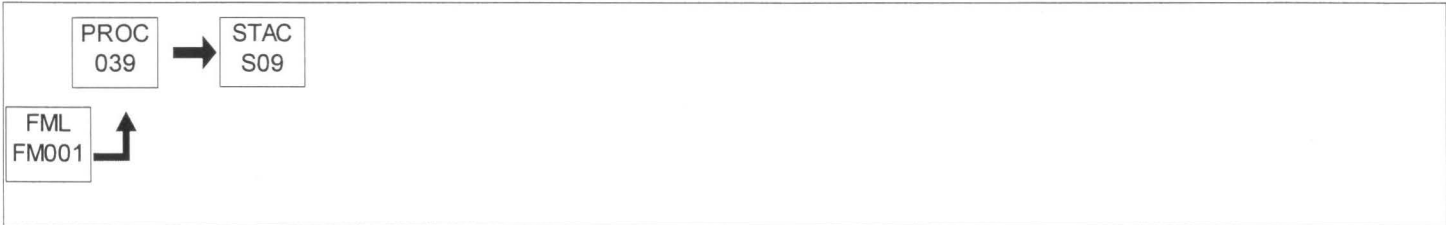




**SECTION D. Source Level Requirements**

Source ID: 039                      Source Name: CATERPILLAR EMER GEN (32735) / 618 HP  
Source Capacity/Throughput:                      6.729 MCF/HR                      Natural Gas

Conditions for this source occur in the following groups: SG03  
SG04  
SG06  
SG07



**I. RESTRICTIONS.**

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

**II. TESTING REQUIREMENTS.**

No additional testing requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

**III. MONITORING REQUIREMENTS.**

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

**IV. RECORDKEEPING REQUIREMENTS.**

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

**V. REPORTING REQUIREMENTS.**

No additional reporting requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

**VI. WORK PRACTICE REQUIREMENTS.**

No additional work practice requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

**VII. ADDITIONAL REQUIREMENTS.**

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

**\*\*\* Permit Shield in Effect. \*\*\***

**SECTION D. Source Level Requirements**

Source ID: 040

Source Name: WAUKESHA EMER GEN (31436) / 600 HP

Source Capacity/Throughput:

6.197 MCF/HR

Natural Gas

Conditions for this source occur in the following groups: SG03  
 SG04  
 SG06  
 SG07

**I. RESTRICTIONS.**

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

**II. TESTING REQUIREMENTS.**

No additional testing requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

**III. MONITORING REQUIREMENTS.**

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

**IV. RECORDKEEPING REQUIREMENTS.**

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

**V. REPORTING REQUIREMENTS.**

No additional reporting requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

**VI. WORK PRACTICE REQUIREMENTS.**

No additional work practice requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

**VII. ADDITIONAL REQUIREMENTS.**

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

**\*\*\* Permit Shield in Effect. \*\*\***

**SECTION D. Source Level Requirements**

Source ID: 041

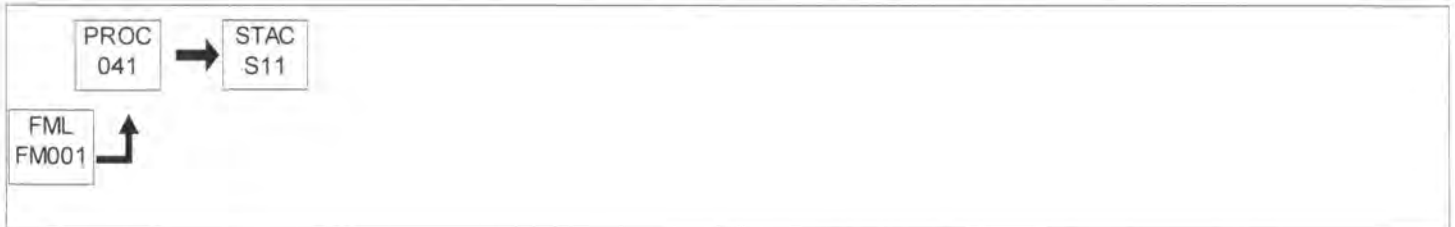
Source Name: LEROIL-3460 EMER GEN (31435) / 600 HP

Source Capacity/Throughput:

6.050 MCF/HR

Natural Gas

Conditions for this source occur in the following groups: SG03  
 SG04  
 SG06  
 SG07

**I. RESTRICTIONS.**

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

**II. TESTING REQUIREMENTS.**

No additional testing requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

**III. MONITORING REQUIREMENTS.**

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

**IV. RECORDKEEPING REQUIREMENTS.**

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

**V. REPORTING REQUIREMENTS.**

No additional reporting requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

**VI. WORK PRACTICE REQUIREMENTS.**

No additional work practice requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

**VII. ADDITIONAL REQUIREMENTS.**

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

**\*\*\* Permit Shield in Effect. \*\*\***

**SECTION D. Source Level Requirements**

Source ID: 042

Source Name: AREA FUGITIVE EMISSIONS

Source Capacity/Throughput:

Conditions for this source occur in the following groups: SG07

**I. RESTRICTIONS.**

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

**II. TESTING REQUIREMENTS.**

No additional testing requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

**III. MONITORING REQUIREMENTS.**

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

**IV. RECORDKEEPING REQUIREMENTS.**

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

**V. REPORTING REQUIREMENTS.**

No additional reporting requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

**VI. WORK PRACTICE REQUIREMENTS.**

No additional work practice requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

**VII. ADDITIONAL REQUIREMENTS.****# 001 [25 Pa. Code §127.512]****Operating permit terms and conditions.**

Source ID 042 consists of all the fugitive volatile organic compound emission sources at the facility. Actual emissions from the following equipment at the facility shall be limited as follows:

(a) VOC emissions shall not exceed 2.7 tons per 12-month rolling period from the group of fugitive VOC emitting components associated with an individual source that has a stack emission. For example, an engine or a turbine would be an individual source and all fugitive VOC emitting components such as flanges, crankcase vents, compressor seals, seal vents, valves and connectors associated with this engine, turbine or dehydrator unit would be collectively considered as a separate VOC emitting source.

(b) Station pigging operations VOC emissions are limited to less than 2.7 tons per 12-month rolling period;

(c) Station blowdown VOC emissions are limited to less than 2.7 tons per 12-month rolling period;

**SECTION D. Source Level Requirements**

- (d) Pipeline blowdown VOC emissions at the Perulack Station are limited to less than 2.7 tons per 12-month rolling period
- (e) The permittee shall calculate VOC emissions using AP-42 emission factors, EPA accepted estimation methodologies, manufacturer supplied emission factors, mass material balance, performance (stack) test data, or other method(s) acceptable to the Department.
- (f) The permittee shall keep adequate records to demonstrate compliance with the above limits. If total station emissions are less than 2.7 tons per 12-month rolling period, it is sufficient to keep records showing this.
- (g) The permittee shall perform monthly audio, visual, and olfactory (AVO) inspections to ensure the fugitive air contaminant emissions are minimized. Any leak detected during the monthly AVO inspection shall be repaired within 15 calendar days of detection unless facility shutdowns or ordering of replacement parts are necessary for repair of the leaks.
- (h) The permittee shall keep a logbook of the following for the AVO inspections, which logbook shall be kept for 5 years and made available to the Department upon request:
- (1) the date of each inspection,
  - (2) initials or name(s) of the person(s) conducting each inspection,
  - (3) the date each leak is detected,
  - (4) the specific location of the leak,
  - (5) the repair performed to eliminate the leak,
  - (6) the date the leak is repaired,
  - (7) the action/inspection taken to determine that the leak is repaired, and
  - (8) the initials or name(s) of the person(s) repairing the leak.

**\*\*\* Permit Shield in Effect. \*\*\***

**SECTION E. Source Group Restrictions.**

Group Name: SG01

Group Description: 031,032,033

Sources included in this group

ID	Name
031	COOP ENG 1 (31501/1100HP)
032	COOP ENG 2 (31502/1100HP)
033	COOP ENG 3 (31503/1100HP)

**I. RESTRICTIONS.****Emission Restriction(s).**

# 001 [25 Pa. Code §123.13]

**Processes**

The permittee shall not allow the emission into the outdoor atmosphere of Particulate Matter (PM) from any of the sources in a manner that the concentration of PM in the effluent gas exceeds 0.04 grains per dry standard cubic foot.

# 002 [25 Pa. Code §123.21]

**General**

The permittee shall not allow the emission into the outdoor atmosphere of sulfur dioxide from a source in a manner that the concentration of sulfur oxides, expressed as SO<sub>2</sub>, in the effluent gas exceeds 500 parts per million, by volume, dry basis.

**Fuel Restriction(s).**

# 003 [25 Pa. Code §127.441]

**Operating permit terms and conditions.**

The permittee shall operate the gas turbines and the IC engines using natural gas only.

**Control Device Efficiency Restriction(s).**

# 004 [25 Pa. Code §127.441]

**Operating permit terms and conditions.**

The Cooper Bessemer GMVA 8 (#31501) IC Engine shall be equipped with ignition retard equipment with the minimum retardation set to no less than two degrees from OEM recommendation.

**II. TESTING REQUIREMENTS.**

# 005 [25 Pa. Code §127.441]

**Operating permit terms and conditions.**

(a) Once in each 5-year calendar period, the permittee shall conduct on each of the sources in this group a Department-approved emissions source test for NO<sub>x</sub> (as NO<sub>2</sub>) emissions that meets the requirements of Chapter 139, Subchapter A (relating to sampling and testing methods and procedures). The test shall be conducted prior to expiration of this permit, or during the applicable heating season determined by the Department. During the four years of each permit cycle when a full source test is not required, the permittee shall annually conduct a compliance verification of NO<sub>x</sub> emissions for each of the sources in this group. Results from source tests or portable analyzer tests shall be submitted to DEP no later 60 calendar days after completion of the on-site testing portion of the emission test program. Test results for NO<sub>x</sub> shall be reported as follows: (1) ppm<sub>dv</sub> as measured; (2) ppm<sub>dv</sub> corrected to 15 percent oxygen; (3) lb/hr; (4) lb/mmbtu of heat input. All test results shall be retained by the permittee at the test location and provided annually with emission statements and at other times as requested by the Department.

(b) The permittee shall maintain comprehensive and accurate records of the following for each of the sources in this group:

- (1) The number of operating hours on both a monthly and 12-month rolling basis.
- (2) The amount of fuel consumed on both a monthly and 12-month rolling basis.

(c) All records required by this condition shall be retained by the permittee for 5 years and made available to the Department upon request.

**SECTION E. Source Group Restrictions.****III. MONITORING REQUIREMENTS.**

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

**IV. RECORDKEEPING REQUIREMENTS.**

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

**V. REPORTING REQUIREMENTS.**

No additional reporting requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

**VI. WORK PRACTICE REQUIREMENTS.**

No additional work practice requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

**VII. ADDITIONAL REQUIREMENTS.**

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

**\*\*\* Permit Shield in Effect. \*\*\***

**SECTION E. Source Group Restrictions.**

Group Name: SG02  
 Group Description: 34,35,36,38  
 Sources included in this group

ID	Name
034	DC TURB 1 (31401 /ISO 5800HP)
035	DC TURB 2 (31402 /ISO 5800HP)
036	DC TURB 3 (31403 /ISO 5800HP)
038	SOLAR TURB (32701/4785HP)

**I. RESTRICTIONS.****Emission Restriction(s).**

# 001 [25 Pa. Code §123.13]

**Processes**

The permittee shall not allow the emission into the outdoor atmosphere of Particulate Matter (PM) from any of the sources in a manner that the concentration of PM in the effluent gas exceeds 0.04 grains per dry standard cubic foot.

**Fuel Restriction(s).**

# 002 [25 Pa. Code §127.441]

**Operating permit terms and conditions.**

The permittee shall operate the gas turbines and the IC engines using natural gas only.

**II. TESTING REQUIREMENTS.**

# 003 [25 Pa. Code §127.441]

**Operating permit terms and conditions.**

(a) Once in each 5-year calendar period, the permittee shall conduct on each of the sources in this group a Department-approved emissions source test for NO<sub>x</sub> (as NO<sub>2</sub>) emissions that meets the requirements of Chapter 139, Subchapter A (relating to sampling and testing methods and procedures). The test shall be conducted prior to expiration of this permit, or during the applicable heating season determined by the Department. During the four years of each permit cycle when a full source test is not required, the permittee shall annually conduct a compliance verification of NO<sub>x</sub> emissions for each of the sources in this group. Results from source tests or portable analyzer tests shall be submitted to DEP no later 60 calendar days after completion of the on-site testing portion of the emission test program. Test results for NO<sub>x</sub> shall be reported as follows: (1) ppmdv as measured; (2) ppmdv corrected to 15 percent oxygen; (3) lb/hr; (4) lb/mmbtu of heat input. All test results shall be retained by the permittee at the test location and provided annually with emission statements and at other times as requested by the Department.

(b) The permittee shall maintain comprehensive and accurate records of the following for each of the sources in this group:

- (1) The number of operating hours on both a monthly and 12-month rolling basis.
- (2) The amount of fuel consumed on both a monthly and 12-month rolling basis.

(c) All records required by this condition shall be retained by the permittee for 5 years and made available to the Department upon request.

**III. MONITORING REQUIREMENTS.**

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

**IV. RECORDKEEPING REQUIREMENTS.**

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).



**SECTION E. Source Group Restrictions.****V. REPORTING REQUIREMENTS.**

No additional reporting requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

**VI. WORK PRACTICE REQUIREMENTS.**

No additional work practice requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

**VII. ADDITIONAL REQUIREMENTS.**

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

**\*\*\* Permit Shield in Effect. \*\*\***

**SECTION E Source Group Restrictions.**

Group Name: SG03

Group Description: 039,040,041

Sources included in this group

ID	Name
039	CATERPILLAR EMER GEN (32735) / 618 HP
040	WAUKESHA EMER GEN (31436) / 600 HP
041	LEROI L-3460 EMER GEN (31435) / 600 HP

**I. RESTRICTIONS.****Emission Restriction(s).**

# 001 [25 Pa. Code §123.21]

**General**

The permittee shall not allow the emission into the outdoor atmosphere of sulfur dioxide from a source in a manner that the concentration of sulfur oxides, expressed as SO<sub>2</sub>, in the effluent gas exceeds 500 parts per million, by volume, dry basis.

**Fuel Restriction(s).**

# 002 [25 Pa. Code §127.441]

**Operating permit terms and conditions.**

The permittee shall operate the gas turbines and the IC engines using natural gas only.

**Operation Hours Restriction(s).**

# 003 [25 Pa. Code §127.441]

**Operating permit terms and conditions.**

Each of the emergency standby engines shall be operated less than 500 hours during any consecutive 12-month period.

**II. TESTING REQUIREMENTS.**

No additional testing requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

**III. MONITORING REQUIREMENTS.**

# 004 [25 Pa. Code §127.441]

**Operating permit terms and conditions.**

The permittee shall monitor the number of hours of operation and the fuel usage on a monthly basis for each of the emergency IC engines.

**IV. RECORDKEEPING REQUIREMENTS.**

# 005 [25 Pa. Code §127.441]

**Operating permit terms and conditions.**

The permittee shall maintain a record of the hours of operation and the fuel usage on a monthly basis for each of the emergency IC engines.

**V. REPORTING REQUIREMENTS.**

No additional reporting requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

**VI. WORK PRACTICE REQUIREMENTS.**

# 006 [25 Pa. Code §127.444]

**Compliance requirements.**

The permittee shall operate and maintain all sources and any air cleaning devices identified in this operating permit in accordance with the manufacturer's recommendations/specifications, as well as in a manner consistent with good operating practices.

**SECTION E. Source Group Restrictions.****VII. ADDITIONAL REQUIREMENTS.**

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

**\*\*\* Permit Shield in Effect. \*\*\***

**SECTION E. Source Group Restrictions.**

Group Name: SG04

Group Description: 40 CFR Part 63 Subpart ZZZZ

Sources included in this group

ID	Name
039	CATERPILLAR EMER GEN (32735) / 618 HP
040	WAUKESHA EMER GEN (31436) / 600 HP
041	LEROI L-3460 EMER GEN (31435) / 600 HP

**I. RESTRICTIONS.**

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

**II. TESTING REQUIREMENTS.**

No additional testing requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

**III. MONITORING REQUIREMENTS.**

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

**IV. RECORDKEEPING REQUIREMENTS.**

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

**V. REPORTING REQUIREMENTS.**

No additional reporting requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

**VI. WORK PRACTICE REQUIREMENTS.**

No additional work practice requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

**VII. ADDITIONAL REQUIREMENTS.****# 001 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

Individual sources within Group SG04 subject to 40 CFR Part 63 Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines shall comply with all applicable requirements of the Subpart. 40 CFR 60.4 requires submission of copies of all requests, reports and other communications to both the Department and the EPA. The EPA copies shall be forwarded to:

Associate Director  
Office of Air Enforcement and Compliance Assistance (3AP20)  
U.S. EPA Region III  
1650 Arch Street  
Philadelphia, PA 19103-2029

The Department copies shall be forwarded to:

Regional Air Program Manager  
PA Department of Environmental Protection  
909 Elmerton Avenue  
Harrisburg, PA 17110-8200

**SECTION E. Source Group Restrictions.**

In the event that 40 CFR Part 63 Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines is revised, the permittee shall comply with the revised version of Subpart ZZZZ, and shall not be required to comply with any provisions in this operating permit designated as having Subpart ZZZZ as their authority, to the extent that such operating permit provisions would be inconsistent with the applicable provisions of the revised Subpart ZZZZ.

**# 002 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6585]****Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines****Am I subject to this subpart?**

You are subject to this subpart if you own or operate a stationary RICE at a major or area source of HAP emissions, except if the stationary RICE is being tested at a stationary RICE test cell/stand.

63.6585(a) - A stationary RICE is any internal combustion engine which uses reciprocating motion to convert heat energy into mechanical work and which is not mobile. Stationary RICE differ from mobile RICE in that a stationary RICE is not a non-road engine as defined at 40 CFR 1068.30, and is not used to propel a motor vehicle or a vehicle used solely for competition.

63.6585(b) - A major source of HAP emissions is a plant site that emits or has the potential to emit any single HAP at a rate of 10 tons (9.07 megagrams) or more per year or any combination of HAP at a rate of 25 tons (22.68 megagrams) or more per year, except that for oil and gas production facilities, a major source of HAP emissions is determined for each surface site.

63.6585(c) - An area source of HAP emissions is a source that is not a major source.

63.6585(d) - If you are an owner or operator of an area source subject to this subpart, your status as an entity subject to a standard or other requirements under this subpart does not subject you to the obligation to obtain a permit under 40 CFR part 70 or 71, provided you are not required to obtain a permit under 40 CFR 70.3(a) or 40 CFR 71.3(a) for a reason other than your status as an area source under this subpart. Notwithstanding the previous sentence, you must continue to comply with the provisions of this subpart as applicable.

63.6585(e) - [NA – NOT USED FOR NATIONAL SECURITY PURPOSES]

63.6585(f) - [NA – RICE NOT RESIDENTIAL, COMMERCIAL OR INSTITUTIONAL]

[69 FR 33506, June 15, 2004, as amended at 73 FR 3603, Jan. 18, 2008; 78 FR 6700, Jan. 30, 2013]

**# 003 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6590]****Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines****What parts of my plant does this subpart cover?**

This subpart applies to each affected source.

63.6590(a) - Affected source. An affected source is any existing, new, or reconstructed stationary RICE located at a major or area source of HAP emissions, excluding stationary RICE being tested at a stationary RICE test cell/stand.

63.6590(a)(1) - Existing stationary RICE.

63.6590(a)(1)(i) - For stationary RICE with a site rating of more than 500 brake horsepower (HP) located at a major source of HAP emissions, a stationary RICE is existing if you commenced construction or reconstruction of the stationary RICE before December 19, 2002.

63.6590(a)(1)(ii) - [NA – THESE ENGINES ARE MORE THAN 500 HP]

63.6590(a)(1)(iii) - [N/A - THESE ENGINES ARE LOCATED AT A MAJOR SOURCE OF HAPs]

63.6590(a)(1)(iv) - A change in ownership of an existing stationary RICE does not make that stationary RICE a new or reconstructed stationary RICE.

**SECTION E. Source Group Restrictions.**

63.6590(a)(2) - New stationary RICE. [N/A - SOURCES IN THIS GROUP ARE EXISTING]

63.6590(a)(3) - Reconstructed stationary RICE. [NA – NOT A RECONSTRUCTED SOURCE]

63.6590(b) - Stationary RICE subject to limited requirements.

63.6590(b)(1) - An affected source which meets either of the criteria in paragraphs (b)(1)(i) through (ii) of this section does not have to meet the requirements of this subpart and of subpart A of this part except for the initial notification requirements of § 63.6645(f).

63.6590(b)(1)(i) - [N/A - SOURCES ARE EXISTING]

63.6590(b)(1)(ii) - [NA – THESE ARE EXISTING ENGINES]

63.6590(b)(2) - [NA – THESE ENGINES DO NOT COMBUST LFG]

63.6590(b)(3) - The following stationary RICE do not have to meet the requirements of this subpart and of subpart A of this part, including initial notification requirements:

63.6590(b)(3)(i) - [N/A - THEY ARE 4 STROKE]

63.6590(b)(3)(ii) - [N/A - THEY ARE RICH BURN]

63.6590(b)(3)(iii) - Existing emergency stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions that does not operate or is not contractually obligated to be available for more than 15 hours per calendar year for the purposes specified in § 63.6640(f)(2)(ii) and (iii). [THIS APPLIES. ENGINES DO NOT OPERATE UNDER 63.6640(f)(2). THEREFORE THE REST OF 4Z DOES NOT APPLY.]

63.6590(b)(3)(iv) - [NA – THESE ENGINES DO NOT EXISTING LIMITED USE]

63.6590(b)(3)(v) - [NA – THESE ENGINES DO NOT COMBUST LFG]

63.6590(c) - [NA – NOT SUBJECT TO SUBPARTS IIII OR JJJJ]

[69 FR 33506, June 15, 2004, as amended at 73 FR 3604, Jan. 18, 2008; 75 FR 9674, Mar. 3, 2010; 75 FR 37733, June 30, 2010; 75 FR 51588, Aug. 20, 2010; 78 FR 6700, Jan. 30, 2013]

\*\*\* **Permit Shield in Effect.** \*\*\*

**SECTION E Source Group Restrictions.**

Group Name: SG05

Group Description: 40 CFR Part 60 Subpart GG

Sources included in this group

ID	Name
034	DC TURB 1 (31401 /ISO 5800HP)
035	DC TURB 2 (31402 /ISO 5800HP)
036	DC TURB 3 (31403 /ISO 5800HP)
038	SOLAR TURB (32701/4785HP)

**I. RESTRICTIONS.****Emission Restriction(s).****# 001 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.332]****Subpart GG - Standards of Performance for Stationary Gas Turbines****Standard for nitrogen oxides.**

(a) On and after the date on which the performance test required by § 60.8 is completed, every owner or operator subject to the provisions of this subpart as specified in paragraphs (b), (c), and (d) of this section shall comply with one of the following, except as provided in paragraphs (e), (f), (g), (h), (i), (j), (k), and (l) of this section.

(1) [NA - SUBJECT TO (a)(2) PER (c)]

(2) No owner or operator subject to the provisions of this subpart shall cause to be discharged into the atmosphere from any stationary gas turbine, any gases which contain nitrogen oxides in excess of:

$$\text{STD} = 0.0150(14.4/Y) + F$$

where:

STD = allowable ISO corrected (if required as given in § 60.335(b)(1)) NOX emission concentration (percent by volume at 15 percent oxygen and on a dry basis),

Y = manufacturer's rated heat rate at manufacturer's rated peak load (kilojoules per watt hour), or actual measured heat rate based on lower heating value of fuel as measured at actual peak load for the facility. The value of Y shall not exceed 14.4 kilojoules per watt hour, [NOTE: PER CO EMAIL DATED 5/17/13, THE VALUE OF Y FOR SOURCE IDs 034, 035, & 036 IS 13.72 KJW-HR, AND SOURCE ID 038 IS 11.67 KJW-HR] and

F = NOX emission allowance for fuel-bound nitrogen as defined in paragraph (a)(4) of this section. [NOTE: PER CO EMAIL DATED 5/17/13, THE COMPANY DOES NOT USE AN ALLOWANCE PER THIS PROVISION. THEREFORE, FOR ALL SOURCE IDs 034, 035, 036, & 038, F = 0]

[NOTE: PER THE ABOVE, THE VALUE OF STD FOR SOURCE IDs 034, 035, & 036 IS 157 PPMV AT 15 PERCENT OXYGEN AND ON A DRY BASIS]

[NOTE: PER THE ABOVE, THE VALUE OF STD FOR SOURCE ID 038 IS 185 PPMV AT 15 PERCENT OXYGEN AND ON A DRY BASIS]

(3) The use of F in paragraphs (a)(1) and (2) of this section is optional. That is, the owner or operator may choose to apply a NOX allowance for fuel-bound nitrogen and determine the appropriate F-value in accordance with paragraph (a)(4) of this section or may accept an F-value of zero.

(4) [NA - FUEL BOUND NOTRIGEN ALLOWANCE NOT USED]

(b) [NA - NOT ELECTRIC UTILITY]

(c) Stationary gas turbines with a heat input at peak load equal to or greater than 10.7 gigajoules per hour (10 million Btu/hour) but less than or equal to 107.2 gigajoules per hour (100 million Btu/hour) based on the lower heating value of the fuel fired, shall comply with the provisions of paragraph (a)(2) of this section.

**SECTION E. Source Group Restrictions.**

(d) [NA - NOT ELECTRIC UTILITY]

(e) [NA - CONSTRUCTED BETWEEN 7/1/85 & 7/1/88 PER T5 APP]

(f) Stationary gas turbines using water or steam injection for control of NOX emissions are exempt from paragraph (a) when ice fog is deemed a traffic hazard by the owner or operator of the gas turbine.

(g) [NA - NOT AN EMERGENCY UNIT]

(h) [NA - NOT R&D UNIT]

(i) [NA - NO CASE BY CASE EXEMPTION]

(j) [NA - < 100 MMBTU/HR CONSTRUCTED BETWEEN 7/1/85 & 7/1/88 PER T5 APP]

(k) [NA - NO EMERGENCY FUEL]

(l) [NA - SOURCE IDs 034, 035, 036, & 038 ARE NOT REGENERATIVE CYCLE GAS TURBINES]

**# 002 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.333]**

**Subpart GG - Standards of Performance for Stationary Gas Turbines**

**Standard for sulfur dioxide.**

On and after the date on which the performance test required to be conducted by § 60.8 is completed, every owner or operator subject to the provision of this subpart shall comply with one or the other of the following conditions:

(a) No owner or operator subject to the provisions of this subpart shall cause to be discharged into the atmosphere from any stationary gas turbine any gases which contain sulfur dioxide in excess of 0.015 percent by volume at 15 percent oxygen and on a dry basis.

(b) No owner or operator subject to the provisions of this subpart shall burn in any stationary gas turbine any fuel which contains total sulfur in excess of 0.8 percent by weight (8000 ppmw).

**II. TESTING REQUIREMENTS.**

**# 003 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.335]**

**Subpart GG - Standards of Performance for Stationary Gas Turbines**

**Test methods and procedures.**

(a) The owner or operator shall conduct the performance tests required in § 60.8, using either [Tests were performed in accordance with Subpart GG for: 034 on 2/13/1986, 035 on 2/12/1986, 036 on 1/10/1985, and 038 on 2/28-3/1/1989.]

(1) EPA Method 20,

(2) ASTM D6522-00 (incorporated by reference, see § 60.17), or

(3) EPA Method 7E and either EPA Method 3 or 3A in appendix A to this part, to determine NOX and diluent concentration.

(4) Sampling traverse points are to be selected following Method 20 or Method 1, (non-particulate procedures) and sampled for equal time intervals. The sampling shall be performed with a traversing single-hole probe or, if feasible, with a stationary multi-hole probe that samples each of the points sequentially. Alternatively, a multi-hole probe designed and documented to sample equal volumes from each hole may be used to sample simultaneously at the required points.

(5) Notwithstanding paragraph (a)(4) of this section, the owner or operator may test at few points than are specified in Method 1 or Method 20 if the following conditions are met:

(i) You may perform a stratification test for NOX and diluent pursuant to

(A) [Reserved]



**SECTION E. Source Group Restrictions.**

(B) The procedures specified in section 6.5.6.1(a) through (e) appendix A to part 75 of this chapter.

(ii) Once the stratification sampling is completed, the owner or operator may use the following alternative sample point selection criteria for the performance test:

(A) If each of the individual traverse point NOX concentrations, normalized to 15 percent O<sub>2</sub>, is within  $\pm 10$  percent of the mean normalized concentration for all traverse points, then you may use 3 points (located either 16.7, 50.0, and 83.3 percent of the way across the stack or duct, or, for circular stacks or ducts greater than 2.4 meters (7.8 feet) in diameter, at 0.4, 1.2, and 2.0 meters from the wall). The 3 points shall be located along the measurement line that exhibited the highest average normalized NOX concentration during the stratification test; or

(B) If each of the individual traverse point NOX concentrations, normalized to 15 percent O<sub>2</sub>, is within  $\pm 5$  percent of the mean normalized concentration for all traverse points, then you may sample at a single point, located at least 1 meter from the stack wall or at the stack centroid.

(6) Other acceptable alternative reference methods and procedures are given in paragraph (c) of this section.

(b) The owner or operator shall determine compliance with the applicable nitrogen oxides emission limitation in § 60.332 and shall meet the performance test requirements of § 60.8 as follows:

(1) For each run of the performance test, the mean nitrogen oxides emission concentration (NOX<sub>o</sub>) corrected to 15 percent O<sub>2</sub> shall be corrected to ISO standard conditions using the following equation. Notwithstanding this requirement, use of the ISO correction equation is optional for: Lean premix stationary combustion turbines; units used in association with heat recovery steam generators (HRSG) equipped with duct burners; and units equipped with add-on emission control devices:

[SEE REGULATION FOR EQUATION]

(2) The 3-run performance test required by § 60.8 must be performed within  $\pm 5$  percent at 30, 50, 75, and 90-to-100 percent of peak load or at four evenly-spaced load points in the normal operating range of the gas turbine, including the minimum point in the operating range and 90-to-100 percent of peak load, or at the highest achievable load point if 90-to-100 percent of peak load cannot be physically achieved in practice. If the turbine combusts both oil and gas as primary or backup fuels, separate performance testing is required for each fuel. Notwithstanding these requirements, performance testing is not required for any emergency fuel (as defined in § 60.331).

(3) For a combined cycle turbine system with supplemental heat (duct burner), the owner or operator may elect to measure the turbine NOX emissions after the duct burner rather than directly after the turbine. If the owner or operator elects to use this alternative sampling location, the applicable NOX emission limit in § 60.332 for the combustion turbine must still be met.

(4) [NA – SOURCES DO NOT USE WATER OR STEAM INJECTION TO CONTROL NOX EMISSIONS]

(5) [NA – FUEL BOUND NITROGEN ALLOWANCE NOT USED]

(6) [NA – SOURCES HAVE NOT ELECTED TO USE CEMS]

(7) [NA – SOURCES HAVE NOT ELECTED TO USE CEMS]

(8) [NA – § 60.334(f) IS NOT APPLICABLE]

(9) [NA – FUEL BOUND NITROGEN ALLOWANCE NOT USED]

(10) [NA – PERMITTEE HAS ELECTED TO USE THE METHOD IN (h)(3)]

(11) [NA - BECAUSE (b)(9) and (b)(10) ARE NA]

(c) The owner or operator may use the following as alternatives to the reference methods and procedures specified in this

**SECTION E. Source Group Restrictions.**

section:

(1) Instead of using the equation in paragraph (b)(1) of this section, manufacturers may develop ambient condition correction factors to adjust the nitrogen oxides emission level measured by the performance test as provided in § 60.8 to ISO standard day conditions.

**III. MONITORING REQUIREMENTS.**

**# 004 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.334]**

**Subpart GG - Standards of Performance for Stationary Gas Turbines**

**Monitoring of operations.**

(a) [NA – SOURCES DO NOT USE WATER OR STEAM INJECTION TO CONTROL NOX EMISSIONS]

(b) [NA – SOURCES DO NOT USE WATER OR STEAM INJECTION TO CONTROL NOX EMISSIONS]

(c) [NA – SOURCES HAVE NOT ELECTED TO USE CEMS]

(d) [NA – SOURCES DO NOT USE WATER OR STEAM INJECTION TO CONTROL NOX EMISSIONS]

(e) [NA – SOURCES WERE INSTALLED BEFORE 2004 [1985 & 1988]]

(f) [NA – SOURCES WERE INSTALLED BEFORE 2004 [1985 & 1988]]

(g) [NA – SOURCES HAVE NOT ELECTED TO USE CEMS]

(h) The owner or operator of any stationary gas turbine subject to the provisions of this subpart:

(1) [NA – PERMITTEE HAS ELECTED TO USE (h)(3)]

(2) [NA – FUEL BOUND NOTRIGEN ALLOWANCE NOT USED]

(3) Notwithstanding the provisions of paragraph (h)(1) of this section, the owner or operator may elect not to monitor the total sulfur content of the gaseous fuel combusted in the turbine, if the gaseous fuel is demonstrated to meet the definition of natural gas in § 60.331(u), regardless of whether an existing custom schedule approved by the administrator for subpart GG requires such monitoring. The owner or operator shall use one of the following sources of information to make the required demonstration:

(i) The gas quality characteristics in a current, valid purchase contract, tariff sheet or transportation contract for the gaseous fuel, specifying that the maximum total sulfur content of the fuel is 20.0 grains/100 scf or less; or

(ii) [NA – PERMITTEE RELIES ON TARIFF SHEET PER 3(i)]

(4) [NA – NO CUSTOM FUEL MONITORING SCHEDULE]

(i) The frequency of determining the sulfur and nitrogen content of the fuel shall be as follows:

(1) [NA - NO OIL USED]

(2) [NA – PERMITTEE HAS ELECTED TO USE THE METHOD IN (h)(3)]

(3) [NA – NO CUSTOM FUEL MONITORING SCHEDULE]

(j) [NA – NO CONTINUOUS OR PERIODIC MONITORING OF PARAMETERS OR EMISSIONS]

**IV. RECORDKEEPING REQUIREMENTS.**

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

**SECTION E. Source Group Restrictions.****V. REPORTING REQUIREMENTS.**

No additional reporting requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

**VI. WORK PRACTICE REQUIREMENTS.**

No additional work practice requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

**VII. ADDITIONAL REQUIREMENTS.****# 005 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

In the event that 40 CFR Part 60 Subpart GG - Standards of Performance for Stationary Gas Turbines is revised, the permittee shall comply with the revised version of Subpart GG, and shall not be required to comply with any provisions in this operating permit designated as having Subpart GG as their authority, to the extent that such operating permit provisions would be inconsistent with the applicable provisions of the revised Subpart GG.

**\*\*\* Permit Shield in Effect. \*\*\***

**SECTION E. Source Group Restrictions.**

Group Name: SG06

Group Description: Presumptive RACT 2 Requirements

Sources included in this group

ID	Name
031	COOP ENG 1 (31501/1100HP)
032	COOP ENG 2 (31502/1100HP)
033	COOP ENG 3 (31503/1100HP)
034	DC TURB 1 (31401 /ISO 5800HP)
035	DC TURB 2 (31402 /ISO 5800HP)
036	DC TURB 3 (31403 /ISO 5800HP)
037	GE TURB (31404/19,800HP)
038	SOLAR TURB (32701/4785HP)
039	CATERPILLAR EMER GEN (32735) / 618 HP
040	WAUKESHA EMER GEN (31436) / 600 HP
041	LEROI L-3460 EMER GEN (31435) / 600 HP

**I. RESTRICTIONS.**

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

**II. TESTING REQUIREMENTS.**

No additional testing requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

**III. MONITORING REQUIREMENTS.**

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

**IV. RECORDKEEPING REQUIREMENTS.**

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

**V. REPORTING REQUIREMENTS.**

No additional reporting requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

**VI. WORK PRACTICE REQUIREMENTS.**

No additional work practice requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

**VII. ADDITIONAL REQUIREMENTS.****# 001 [25 Pa. Code §129.96]****Applicability**

§ 129.96. Applicability.

(a) The NO<sub>x</sub> requirements of this section and §§ 129.97—129.100 apply Statewide to the owner and operator of a major NO<sub>x</sub> emitting facility and the VOC requirements of this section and §§ 129.97—129.100 apply Statewide to the owner and operator of a major VOC emitting facility that were in existence on or before July 20, 2012, for which a requirement or emission limitation, or both, has not been established in §§ 129.51—129.52c, 129.54—129.69, 129.71—129.73, 129.75, 129.77, 129.101—129.107 and 129.301—129.310.

**SECTION E. Source Group Restrictions.**

(b) The NOx requirements of this section and §§ 129.97—129.100 apply Statewide to the owner and operator of a NOx emitting facility and the VOC requirements of this section and §§ 129.97—129.100 apply Statewide to the owner and operator of a VOC emitting facility when the installation of a new source or a modification or change in operation of an existing source after July 20, 2012, results in the source or facility meeting the definition of a major NOx emitting facility or a major VOC emitting facility and for which a requirement or an emission limitation, or both, has not been established in §§ 129.51—129.52c, 129.54—129.69, 129.71—129.73, 129.75, 129.77, 129.101—129.107 and 129.301—129.310.

(c) This section and §§ 129.97—129.100 do not apply to the owner and operator of a NOx air contamination source located at a major NOx emitting facility that has the potential to emit less than 1 TPY of NOx or a VOC air contamination source located at a major VOC emitting facility that has the potential to emit less than 1 TPY of VOC.

(d) [NA - FACILITY IS MAJOR FOR NOX AND VOC]

§ 129.97. Presumptive RACT requirements, RACT emission limitations and petition for alternative compliance schedule.

(a) The owner and operator of a source listed in one or more of subsections (b)—(h) located at a major NOx emitting facility or major VOC emitting facility subject to § 129.96 (relating to applicability) shall comply with the applicable presumptive RACT requirement or RACT emission limitation, or both, beginning with the specified compliance date as follows, unless an alternative compliance schedule is submitted and approved under subsections (k)—(m) or § 129.99 (relating to alternative RACT proposal and petition for alternative compliance schedule):

(1) January 1, 2017, for a source subject to § 129.96(a).

(2) [NA – SOURCES IN THIS GROUP WERE IN EXISTENCE BEFORE 7/20/12]

(b) [NA – THE SOURCES IN THIS GROUP DO NOT MEET THE DEFINITION OF COMBUSTION UNITS]

(c) The owner and operator of a source specified in this subsection, which is located at a major NOx emitting facility or major VOC emitting facility subject to § 129.96 shall install, maintain and operate the source in accordance with the manufacturer's specifications and with good operating practices:

(1) – (7) [NA – THE SOURCES IN THIS GROUP DO NOT FIT THE LISTED CATEGORIES]

(8) An emergency standby engine operating less than 500 hours in a 12-month rolling period. [THIS APPLIES TO SOURCES 039, 040 AND 041]

(d) [NA – THE SOURCES IN THIS GROUP DO NOT MEET THE DEFINITION OF COMBUSTION UNITS]

(e) [NA – THE SOURCES IN THIS GROUP ARE NOT LANDFILLS]

(f) [NA – THE SOURCES IN THIS GROUP ARE NOT MMWs]

(g) Except as specified under subsection (c), the owner and operator of a NOx air contamination source specified in this subsection, which is located at a major NOx emitting facility or a VOC air contamination source specified in this subsection, which is located at a major VOC emitting facility subject to § 129.96 may not cause, allow or permit NOx or VOCs to be emitted from the air contamination source in excess of the applicable presumptive RACT emission limitation:

(1) [NA – THE SOURCES IN THIS GROUP DO NOT FIT THE LISTED CATEGORIES]

(2) A combustion turbine:

(i) [NA – TURBINES IN THIS GROUP ARE NOT COMBINED CYCLE]

(iii) For a simple cycle or regenerative cycle combustion turbine with a rated output equal to or greater than 1,000 bhp and less than 6,000 bhp when firing:

(A) Natural gas or a noncommercial gaseous fuel, 150 ppmvd NOx @ 15% oxygen. [THIS APPLIES TO SOURCES 034,

**SECTION E. Source Group Restrictions.**

035 AND 036, WHICH ARE ISO 5,000 HP AND TO SOURCE 038 WHICH IS ISO 4,800 HP; HOWEVER SOURCE 038 IS SUBJECT TO A MORE STRINGENT 100 PPM NOX LIMIT ELSEWHERE IN THIS PERMIT]

(B) [NA – SOURCES IN THIS GROUP DO NOT FIRE FUEL OIL]

(C) Natural gas or a noncommercial gaseous fuel, 9 ppmvd VOC (as propane) @ 15% oxygen. [THIS APPLIES TO SOURCES 034, 035 AND 036, WHICH ARE ISO 5,000 HP AND TO SOURCE 038 WHICH IS ISO 4,800 HP]

(D) [NA – SOURCES IN THIS GROUP DO NOT FIRE FUEL OIL]

(iv) For a simple cycle or regenerative cycle combustion turbine with a rated output equal to or greater than 6,000 bhp when firing:

(A) [NA – SOURCE 037, WHICH WOULD OTHERWISE BE SUBJECT TO THIS PROVISION, HAS UNDERGONE A CASE-BY-CASE RACT ANALYSIS TO APPROVE AN ALTERNATIVE STANDARD PER 25 PA CODE SECTION 129.99]

(B) [NA – SOURCES IN THIS GROUP DO NOT FIRE FUEL OIL]

(C) Natural gas or a noncommercial gaseous fuel, 9 ppmvd VOC (as propane) @ 15% oxygen. [THIS APPLIES TO SOURCE 037, WHICH IS ISO 19,800 HP]

(D) [NA – SOURCES IN THIS GROUP DO NOT FIRE FUEL OIL]

(3) A stationary internal combustion engine:

(i) For a lean burn stationary internal combustion engine with a rating equal to or greater than 500 bhp fired with:

(A) Natural gas or a noncommercial gaseous fuel, 3.0 grams NOx/bhp-hr. [THIS APPLIES TO SOURCES 032 AND 033 AS OF 1/1/17; THIS APPLIES TO SOURCE 031 AS OF 1/1/20, BY WHICH TIME THE PERMITTEE SHALL RETROFIT SOURCE 031 WITH LEAN BURN TECHNOLOGY SO AS TO MEET NOX THE LIMIT OF 3.0 GRAMS/BHP-HR. UNTIL 1/1/20, SOURCE 031 HAS AN APPROVED COMPLIANCE EXTENSION FROM THIS PRESUMPTIVE RACT STANDARD, AND IS DESIGNATED A DIFFERENT, ALTERNATIVE LIMIT ELSEWHERE IN THIS PERMIT]

(B) Natural gas or a noncommercial gaseous fuel, liquid fuel or dual-fuel, 1.0 gram VOC/bhp-hr excluding formaldehyde. [THIS APPLIES TO SOURCES 031, 032 AND 033]

(ii) [NA – ENGINES NOT DUAL FUEL OR LIQUID FUEL]

(iii) [NA – ENGINES ARE NOT RICH BURN]

(4) [NA – THE SOURCES IN THIS GROUP DO NOT FIT THE LISTED CATEGORIES]

(h) [NA – THE SOURCES IN THIS GROUP ARE NOT CEMENT KILNS]

(i) The requirements and emission limitations of this section supersede the requirements and emission limitations of a RACT permit issued to the owner or operator of an air contamination source subject to one or more of subsections (b)–(h) prior to April 23, 2016, under § § 129.91–129.95 (relating to stationary sources of NOx and VOCs) to control, reduce or minimize NOx emissions or VOC emissions, or both, from the air contamination source unless the permit contains more stringent requirements or emission limitations, or both.

(j) [NA – THE SOURCES IN THIS GROUP DO NOT FIT THE LISTED CATEGORIES]

(k) - (m) [NA – THE SOURCES IN THIS GROUP CAN MEET PRESUMPTIVE RACT]

§ 129.98. Facility-wide or system-wide NOx emissions averaging plan general requirements. [NA – SOURCES IN THIS GROUP ARE MEETING PRESUMPTIVE RACT]

**SECTION E. Source Group Restrictions.**

§ 129.99. Alternative RACT proposal and petition for alternative compliance schedule. [NA – SOURCES IN THIS GROUP ARE MEETING PRESUMPTIVE RACT]

§ 129.100. Compliance demonstration and recordkeeping requirements.

(a) Except as provided in subsection (c), the owner and operator of an air contamination source subject to a NO<sub>x</sub> requirement or RACT emission limitation or VOC requirement or RACT emission limitation, or both, listed in § 129.97 (relating to presumptive RACT requirements, RACT emission limitations and petition for alternative compliance schedule) shall demonstrate compliance with the applicable RACT requirement or RACT emission limitation by performing the following monitoring or testing procedures:

(1) - (3) [NA – THE SOURCES IN THIS GROUP DO NOT HAVE CEMS]

(4) For an air contamination source without a CEMS, monitoring and testing in accordance with a Department-approved emissions source test that meets the requirements of Chapter 139, Subchapter A (relating to sampling and testing methods and procedures). The source test shall be conducted one time in each 5-year calendar period. [THIS APPLIES TO SOURCES 031, 032, 033, 034, 035, 036, 037 AND 038; ADDITIONAL TESTING FOR THESE SOURCES IS ALSO REQUIRED ELSEWHERE IN THIS PERMIT]

(b) [INITIAL COMPLIANCE TESTING FOR ANY SOURCES IN THIS GROUP IS COMPLETE]

(c) [NO WAIVER GRANTED IN THIS CASE]

(d) The owner and operator of an air contamination source subject to this section and §§ 129.96—129.99 shall keep records to demonstrate compliance with §§ 129.96—129.99 in the following manner:

(1) The records must include sufficient data and calculations to demonstrate that the requirements of §§ 129.96—129.99 are met.

(2) Data or information required to determine compliance shall be recorded and maintained in a time frame consistent with the averaging period of the requirement.

(e) Beginning with the compliance date specified in § 129.97(a), the owner or operator of an air contamination source claiming that the air contamination source is exempt from the applicable NO<sub>x</sub> emission rate threshold specified in § 129.99(b) and the requirements of § 129.97 based on the air contamination source's potential to emit shall maintain records that demonstrate to the Department or appropriate approved local air pollution control agency that the air contamination source is not subject to the specified emission rate threshold.

(f) Beginning with the compliance date specified in § 129.97(a), the owner or operator of an air contamination source claiming that the air contamination source is exempt from the applicable VOC emission rate threshold specified in § 129.99(c) and the requirements of § 129.97 based on the air contamination source's potential to emit shall maintain records that demonstrate to the Department or appropriate approved local air pollution control agency that the air contamination source is not subject to the specified emission rate threshold.

(g) [NA – THE SOURCES IN THIS GROUP DO NOT MEET THE DEFINITION OF COMBUSTION UNITS]

(h) [NA – THE SOURCES IN THIS GROUP ARE NOT CEMENT KILNS]

(i) The records shall be retained by the owner or operator for 5 years and made available to the Department or appropriate approved local air pollution control agency upon receipt of a written request from the Department or appropriate approved local air pollution control agency.

\*\*\* Permit Shield in Effect. \*\*\*

**SECTION E. Source Group Restrictions.**

Group Name: SG07

Group Description: 129.91-129.95 RACT I Requirements

Sources included in this group

ID	Name
034	DC TURB 1 (31401 /ISO 5800HP)
035	DC TURB 2 (31402 /ISO 5800HP)
036	DC TURB 3 (31403 /ISO 5800HP)
038	SOLAR TURB (32701/4785HP)
039	CATERPILLAR EMER GEN (32735) / 618 HP
040	WAUKESHA EMER GEN (31436) / 600 HP
041	LEROI L-3460 EMER GEN (31435) / 600 HP
042	AREA FUGITIVE EMISSIONS

**I. RESTRICTIONS.**

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

**II. TESTING REQUIREMENTS.**

No additional testing requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

**III. MONITORING REQUIREMENTS.**

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

**IV. RECORDKEEPING REQUIREMENTS.**

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

**V. REPORTING REQUIREMENTS.**

No additional reporting requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

**VI. WORK PRACTICE REQUIREMENTS.**

No additional work practice requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

**VII. ADDITIONAL REQUIREMENTS.****# 001 [25 Pa. Code §129.91]****Control of major sources of NOx and VOCs**

Texas Eastern Transmission Corp. Perulack/Leidy Compressor Station  
RACT Operating Permit No. 34-2002 SIP requirements

Source: Company ID#: Manufacturer/Model: Control Device

Perulack:

Three 5,000 Hp Gas Turbines: 31401 thru 31403: Dresser Clark/DC-990: None  
19,800 Hp Gas Turbine: 31404: General Electric/Frame 5 MS 5001 LAMD: None  
445 HP IC Engine: 31435: Leroi/L 3460: None  
486 HP IC Engine: 31436: Waukesha/L 3711: None



**SECTION E. Source Group Restrictions.**

Leidy;

4,785 Hp Gas Turbine: 32701: Solar/Centaur H: None

One 1,100 Supercharged IC Engine: 31501: Cooper Bessemer/GMVA 8: Ignition Retard

Two 1,100 Turbocharged IC Engine: 31502 and 31503: Cooper Bessemer/GMVA 8: Precombustion Chamber

600 Hp IC Engine: 32735: Caterpillar/3412: None

1. The source and any associated air cleaning devices 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 Reasonably Available Control Technology (RACT) plan;
- c. operated and maintained in a manner consistent with good operating and maintenance practices.

4. This operating permit is for the incorporation of the Department's NO<sub>x</sub> Reasonably Available Control Technology (RACT) requirements (25 Pa. Code Sections 129.91 through 129.95) for the Perulack/Leidy Compressor Station.

5. The gas turbines are subject to the following NO emission standards when operating at normal condition. Normal operating conditions are defined as +/-10 percent of the nameplate horsepower rating of the turbine.

- a. Dresser Clark DC 990 – 150 ppmvd corrected to 15 percent O<sub>2</sub>
- b. General Electric Frame 5 MS 5001 LAMD – 120 ppmvd corrected to 15 percent O<sub>2</sub>
- c. Solar Centaur H – 100 ppmvd corrected to 15 percent O<sub>2</sub>

6. The Cooper Bessemer GMVA 8 IC Engines are subject to the following NO<sub>x</sub> emission standards:

- a. Engine 31501 – 27.3 lb/hr
- b. Engines 31502 and 31503 – 7.3 lb/hr

7. The emission limits listed in Condition Nos. 5 and 6 do not apply during the startup and shutdown of the gas turbines or IC engines. Startup and shutdown periods are limited to a maximum of one hour each. [THIS ALLOWANCE IS NO LONGER ALLOWED UNDER RACT 2]

8. Each of the emergency standby engines (Leroi L 3460, Waukesha L 3711 and Caterpillar 3412) shall be operated less than 500 hours during any consecutive 12-month period [25 Pa. Code Section 129.93(c)(5)].

9. Verification of the NO<sub>x</sub> emission standard listed in Condition Nos. 5 and 6 shall be conducted semi-annually utilizing methodology outlined in 25 Pa. Code Chapter 139 and the Department's Source Testing Manual or by other means approved by the Department. Based on the monthly records of fuel usage and operating hours, the Department reserves the right to decrease verification frequency to an annual basis. [PURSUANT TO THE ALTERNATIVES ALLOWED IN THIS CONDITION, DEP CURRENTLY REQUIRES ANNUAL STACK TESTING, AND ALLOWS THIS TO BE DONE WITH A PORTABLE ANALYZER IN FOUR YEARS OUT OF FIVE]

10. At least two weeks prior to the test program, the Program Manager shall be informed of the date and time of the tests.

11. Within 60 days after completion of the test program, two copies of the test reports, including all operating conditions, shall be submitted to the Program Manager. Test results shall be reported as follows:

- a. ppmdv
- b. ppmdv corrected to 15 percent O<sub>2</sub> (turbines only)
- c. gm/hp-hr (engines only)
- d. lb/hr
- e. lb/mmBtu of heat input

12. Records shall be maintained in accordance with 25 Pa. Code Section 129.95 requirements.

13. An annual report containing monthly records of fuel usage and operating hours for the sources listed in this operating permit shall be submitted to the Harrisburg District Supervisor. The report for January 1 through December 31 is due no

**SECTION E. Source Group Restrictions.**

later than March 1 of the following year for each operating year authorized by the operating permit or its renewal.

14. The three Dresser Clark Dc 990 and the one Solar Centaur H gas turbines are subject to Subpart GG of the Standards of Performance for New Stationary Sources and shall comply with all applicable requirements of this subpart. 40 CFR Section 60.4 requires submission of copies of all requests, reports, applications, submittals, and other communications to both EPA and the Department. The EPA copies shall be forwarded to:

Associate Director  
Office of Air Enforcement and Compliance Assistance (3AP20)  
U.S. EPA, Region III  
1650 Arch Street  
Philadelphia, PA 19103

15. The sum total of NO<sub>x</sub> emissions from the Solar Centaur H gas turbine and the three Cooper Bess emmer GMVA 8 IC Engines shall not exceed 256 tons per year.

Note: The above Condition 7 is no longer applicable, as it is less stringent than allowed under RACT 2. The other above conditions, except for Conditions 5(c.), 6(a.) and 15, shall be superseded by the RACT 2 requirements for this facility upon approval of such supersedure as a SIP revision. The above Condition 6(a) shall be superseded by the more stringent presumptive RACT requirement for this facility on 1/1/20.

**\*\*\* Permit Shield in Effect. \*\*\***

**SECTION E. Source Group Restrictions.**

Group Name: SG08

Group Description: Case by Case RACT 2 Requirements

Sources included in this group

ID	Name
037	GE TURB (31404/19,800HP)

**I. RESTRICTIONS.**

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

**II. TESTING REQUIREMENTS.**

No additional testing requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

**III. MONITORING REQUIREMENTS.**

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

**IV. RECORDKEEPING REQUIREMENTS.**

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

**V. REPORTING REQUIREMENTS.**

No additional reporting requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

**VI. WORK PRACTICE REQUIREMENTS.**

No additional work practice requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

**VII. ADDITIONAL REQUIREMENTS.****# 001 [25 Pa. Code §129.96]****Applicability**

(a) The permittee shall not permit emissions of NO<sub>x</sub> from Source 037 in excess of the following. These emission limits apply at all times, including startup and shutdown periods.

(1) 120 ppm<sub>dv</sub> corrected to 15 percent oxygen, and

(2) 329 tpy on a 12-month running total.

(b) Once in each 5-year calendar period, the permittee shall conduct on Source 037 a Department-approved emissions source test for NO<sub>x</sub> (as NO<sub>2</sub>) emissions that meets the requirements of Chapter 139, Subchapter A (relating to sampling and testing methods and procedures). The test shall be conducted prior to expiration of this permit, or during the applicable heating season determined by the Department. During the four years of each permit cycle when a full source test is not required, the permittee shall annually conduct a compliance verification of NO<sub>x</sub> emissions for Source 037. Results from source tests or portable analyzer tests shall be submitted to DEP no later than 60 calendar days after completion of the on-site testing portion of the emission test program. Test results for NO<sub>x</sub> shall be reported as follows: (1) ppm<sub>dv</sub> as measured; (2) ppm<sub>dv</sub> corrected to 15 percent oxygen; (3) lb/hr; (4) lb/mmBtu of heat input. All test results shall be retained by the permittee at the test location and provided annually with emission statements and at other times as requested by the Department.

(c) The permittee shall maintain comprehensive and accurate records of the following for Source 037:

**SECTION E. Source Group Restrictions.**

- (1) The number of operating hours on both a monthly and 12-month rolling basis.
- (2) The amount of fuel consumed on both a monthly and 12-month rolling basis.
  
- (d) The permittee shall maintain records including sufficient data and calculations to demonstrate that the RACT emission limitations for nitrogen oxides are met for Source 037.
  
- (e) All records required by this source group shall be retained by the permittee for 5 years and made available to the Department upon request.
  
- (f) The permittee will maintain and operate Source 037 in accordance with the manufacturer's specifications and with good operating practices. The permittee shall follow a routine and preventive maintenance schedule.
  
- (g) Source 037 shall be permanently shut down by no later than January 1, 2024.

**\*\*\* Permit Shield in Effect. \*\*\***



**SECTION F. Alternative Operation Requirements.**

No Alternative Operations exist for this Title V facility.



**SECTION G. Emission Restriction Summary.**

No emission restrictions listed in this section of the permit.

**SECTION H. Miscellaneous.**

#001. (a) In October 2016, Texas Eastern Transmission, L.P. submitted a minor operating permit modification application to include source specific 2.7 tpy of VOC emissions limit. The revision of the Title V operating permit issued 12/21/16 addressed that request.

(b) This revision to Title V operating permit is significant modification to permit to include RACT II requirements.

#002. The following sources and activities are not subject to any specific work practice standards, testing, monitoring, recordkeeping or reporting requirements.

- 1) 8 gas fired space heaters totaling 988,000 Btu. are listed below:
- 2) Pipeline Liquid Storage tanks are:
  - 003A & 003B, capacity 1,300 gallons each; and 003C, capacity 2,980 gallons.
- 3) Storage tanks above ground are:
  - Lube oil tank, capacity 3,374 gallons;
  - Oil tank, capacity 3,187 gallons;
  - Two odorant tanks, capacity 8,295 gallons each;
  - Two Anti-freeze tanks, capacity 2,300 gallons & 3,371 gallons;
  - GE Lube tank, capacity 2,300 gallons; and
  - Scrubber oil tank, capacity 345 gallons.



\*\*\*\*\* End of Report \*\*\*\*\*

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