



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
AIR QUALITY PROGRAM

PLAN APPROVAL

Issue Date: April 16, 2024

Effective Date: July 28, 2026

Revision Date: July 17, 2026

Expiration Date: January 28, 2027

Revision Type: Extension

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 construct, install, modify or reactivate the air emission source(s) more fully described in the site inventory list. This Facility is subject to all terms and conditions specified in this plan approval. Nothing in this plan approval 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 plan approval condition is set forth in brackets. All terms and conditions in this permit are federally enforceable unless otherwise designated as "State-Only" requirements.

Plan Approval No. 63-00631B

Federal Tax Id - Plant Code: 31-0802435-12

Owner Information

Name: COLUMBIA GAS TRANS LLC

Mailing Address: 455 RACETRACK RD
WASHINGTON, PA 15301-8910

Plant Information

Plant: COLUMBIA GAS TRANS CORP/DONEGAL COMP STA

Location: 63 Washington County 63927 Donegal Township

SIC Code: 4922 Trans. & Utilities - Natural Gas Transmission

Responsible Official

Name: DULANEY JASON

Title: OPERATIONS MGR

Phone: (724) 747 - 4332

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Plan Approval Contact Person

Name: KAYLA TROUT

Title: ENV ANALYST

Phone: (724) 223 - 2519

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[Signature] _____

MARK R. GOROG, P.E., ENVIRONMENTAL PROGRAM MANAGER, SOUTHWEST REGION



Plan Approval Description

This Plan Approval authorizes the construction and temporary operation of one (1) triethylene glycol (TEG) dehydrator with design natural gas capacity 205 million standard cubic feet per day (MMscfd), equipped with one (1) 2.28 MMBtu/hr natural gas-fired reboiler, three-phase flash separator, and a 4.0 MMBtu/hr enclosed flare; a 10,000-gallon pipeline fluids storage tank; a 4,500-gallon TEG storage tank; and associated fugitive emissions components.

This Plan Approval was modified on February 19, 2025, to reflect that the initial period of temporary operation for the authorized sources and controls commenced on November 24, 2024.



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

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**SECTION A. Plan Approval Inventory List**

Source ID	Source Name	Capacity/Throughput	Fuel/Material
201	2.28 MMBTU/HR TEG REBOILER	2,236.000 CF/HR	Natural Gas
301	10,000 GALLON PIPELINE LIQUIDS STORAGE TANK	N/A	
401	205 MMSCFD TEG DEHYDRATOR	8.540 MMCF/HR	Natural Gas
601	VENTING/BLOWDOWNS	N/A	Natural Gas
701	FUGITIVES	N/A	Natural Gas
C401	DEHYDRATOR FLARE		
S201	2.28 MMBTU/HR REBOILER STACK		
S301	10,000 GALLON PIPELINE LIQUIDS STORAGE TANK STACK		
Z601	VENTING/BLOWDOWNS STACK		
Z701	FUGITIVES STACK		

PERMIT MAPS

PROC
201 → STAC
S201

PROC
301 → STAC
S301

PROC
401 → CNTL
C401

PROC
601 → STAC
Z601

PROC
701 → STAC
Z701

**SECTION B. General Plan Approval Requirements****#001 [25 Pa. Code § 121.1]****Definitions**

Words and terms that are not otherwise defined in this plan approval 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 § 127.12b (a) (b)]**Future Adoption of Requirements**

The issuance of this plan approval does not prevent the future adoption by the Department of any rules, regulations or standards, or the issuance of orders necessary to comply with the requirements of the Federal Clean Air Act or the Pennsylvania Air Pollution Control Act, or to achieve or maintain ambient air quality standards. The issuance of this plan approval shall not be construed to limit the Department's enforcement authority.

#003 [25 Pa. Code § 127.12b]**Plan Approval Temporary Operation**

This plan approval authorizes temporary operation of the source(s) covered by this plan approval provided the following conditions are met.

(a) When construction, installation, modification, or reactivation is being conducted, the permittee shall provide written notice to the Department of the completion of the activity approved by this plan approval and the permittee's intent to commence operation at least five (5) working days prior to the completion of said activity. The notice shall state when the activity will be completed and when the permittee expects to commence operation. When the activity involves multiple sources on different time schedules, notice is required for the commencement of operation of each source.

(b) Pursuant to 25 Pa. Code § 127.12b (d), temporary operation of the source(s) is authorized to facilitate the shakedown of sources and air cleaning devices, to permit operations pending the issuance of a permit under 25 Pa. Code Chapter 127, Subchapter F (relating to operating permits) or Subchapter G (relating to Title V operating permits) or to permit the evaluation of the air contaminant aspects of the source.

(c) This plan approval authorizes a temporary operation period not to exceed 180 days from the date of commencement of operation, provided the Department receives notice from the permittee pursuant to paragraph (a), above.

(d) The permittee may request an extension of the 180-day shakedown period if further evaluation of the air contamination aspects of the source(s) is necessary. The request for an extension shall be submitted, in writing, to the Department at least 30 days prior to the end of the initial 180-day shakedown period and shall provide a description of the compliance status of the source, a detailed schedule for establishing compliance, and the reasons compliance has not been established. This temporary operation period will be valid for a limited time and may be extended for additional limited periods, each not to exceed 180 days.

(e) The notice submitted by the permittee pursuant to subpart (a) above, prior to the expiration of the plan approval, shall modify the plan approval expiration date on Page 1 of this plan approval. The new plan approval expiration date shall be 180 days from the date of commencement of operation.

#004 [25 Pa. Code § 127.12(a) (10)]**Content of Applications**

The permittee shall maintain and operate the sources and associated air cleaning devices in accordance with good engineering practice as described in the plan approval application submitted to the Department.

#005 [25 Pa. Code §§ 127.12(c) and (d) & 35 P.S. § 4013.2]**Public Records and Confidential Information**

(a) The records, reports or information obtained by the Department or referred to at public hearings shall be available to the public, except as provided in paragraph (b) of this condition.

(b) Upon cause shown by the permittee that the records, reports or information, or a particular portion thereof, but not emission data, to which the Department has access under the act, if made public, would divulge production or sales figures or methods, processes or production unique to that person or would otherwise tend to affect adversely the

**SECTION B. General Plan Approval Requirements**

competitive position of that person by revealing trade secrets, including intellectual property rights, the Department will consider the record, report or information, or particular portion thereof confidential in the administration of the act. The Department will implement this section consistent with sections 112(d) and 114(c) of the Clean Air Act (42 U.S.C.A. § 7412(d) and 7414(c)). Nothing in this section prevents disclosure of the report, record or information to Federal, State or local representatives as necessary for purposes of administration of Federal, State or local air pollution control laws, or when relevant in a proceeding under the act.

#006 [25 Pa. Code § 127.12b]**Plan Approval Terms and Conditions**

[Additional authority for this condition is derived from 25 Pa. Code Section 127.13]

(a) This plan approval will be valid for a limited time, as specified by the expiration date contained on Page 1 of this plan approval. Except as provided in § § 127.11a and 127.215 (relating to reactivation of sources; and reactivation), at the end of the time, if the construction, modification, reactivation or installation has not been completed, a new plan approval application or an extension of the previous approval will be required.

(b) If construction has commenced, but cannot be completed before the expiration of this plan approval, an extension of the plan approval must be obtained to continue construction. To allow adequate time for departmental action, a request for the extension shall be postmarked at least thirty (30) days prior to the expiration date. The request for an extension shall include the following:

- (i) A justification for the extension,
- (ii) A schedule for the completion of the construction

If construction has not commenced before the expiration of this plan approval, then a new plan approval application must be submitted and approval obtained before construction can commence.

(c) If the construction, modification or installation is not commenced within 18 months of the issuance of this plan approval or if there is more than an 18-month lapse in construction, modification or installation, a new plan approval application that meets the requirements of 25 Pa. Code Chapter 127, Subchapter B (related to plan approval requirements), Subchapter D (related to prevention of significant deterioration of air quality), and Subchapter E (related to new source review) shall be submitted. The Department may extend the 18-month period upon a satisfactory showing that an extension is justified.

#007 [25 Pa. Code § 127.32]**Transfer of Plan Approvals**

(a) This plan approval may not be transferred from one person to another except when a change of ownership is demonstrated to the satisfaction of the Department and the Department approves the transfer of the plan approval in writing.

(b) Section 127.12a (relating to compliance review) applies to a request for transfer of a plan approval. A compliance review form shall accompany the request.

(c) This plan approval is valid only for the specific source and the specific location of the source as described in the application.

#008 [25 Pa. Code § 127.12(a)(4) & 35 P.S. § 4008 & § 114 of the CAA]**Inspection and Entry**

(a) 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.

(b) The permittee shall also allow the Department to have access at reasonable times to said sources and associated air cleaning devices with such measuring and recording equipment, including equipment recording visual observations, as the Department deems necessary and proper for performing its duties and for the effective enforcement of the Air Pollution Control Act and regulations adopted under the act.

**SECTION B. General Plan Approval Requirements**

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

#009 [25 Pa. Code 127.13a]**Plan Approval Changes for Cause**

This plan approval may be terminated, modified, suspended or revoked and reissued if one or more of the following applies:

- (a) The permittee constructs or operates the source subject to the plan approval in violation of the act, the Clean Air Act, the regulations promulgated under the act or the Clean Air Act, a plan approval or permit or in a manner that causes air pollution.
- (b) The permittee fails to properly or adequately maintain or repair an air pollution control device or equipment attached to or otherwise made a part of the source.
- (c) The permittee fails to submit a report required by this plan approval.
- (d) The Environmental Protection Agency determines that this plan approval is not in compliance with the Clean Air Act or the regulations thereunder.

#010 [25 Pa. Code §§ 121.9 & 127.216]**Circumvention**

- (a) The permittee, 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 plan approval, the Air Pollution Control Act or the regulations promulgated thereunder, except that with prior approval of the Department, the device or technique may be used for control of malodors.

#011 [25 Pa. Code § 127.12c]**Submissions**

Reports, test data, monitoring data, notifications shall be submitted to the:

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

#012 [25 Pa. Code § 127.12(a)(9) & 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 facility. The permittee shall submit the RMP to the Environmental Protection Agency according to the following schedule and requirements:

(1) The permittee shall submit the first RMP to a central point specified by the Environmental Protection Agency no later than the latest of the following:

**SECTION B. General Plan Approval Requirements**

- (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 the Environmental Protection Agency 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 plan approval 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.

#013 [25 Pa. Code § 121.7]**Prohibition of Air Pollution**

No person may permit air pollution as that term is defined in the Air Pollution Control Act (35 P.S. §§ 4001-4015).

#014 [25 Pa. Code § 127.25]**Compliance Requirement**

A person may not cause or permit the operation of a source subject to § 127.11 (relating to plan approval requirements), unless the source and air cleaning devices identified in the application for the plan approval and the plan approval issued to the source, are operated and maintained in accordance with specifications in the application and conditions in the plan approval issued by the Department. A person may not cause or permit the operation of an air contamination source subject to this chapter in a manner inconsistent with good operating practices.

**SECTION C. Site Level Plan Approval Requirements****I. RESTRICTIONS.****Emission Restriction(s).****# 001 [25 Pa. Code §121.7]****Prohibition of air pollution.**

No person may permit air pollution as that term is defined in the act.

002 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

The permittee may 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.

003 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

The permittee shall not allow the emission into the outdoor atmosphere of visible air contaminants from any source authorized by this plan approval in such a manner that opacity is equal to or greater than 10% at any time.

004 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

The specified visible emissions limitations shall not apply to a visible emission in any of the following instances:

- (a) When the presence of uncombined water is the only reason for failure of the emission to meet the limitations.
- (b) When the emission results from the operation of equipment used solely to train and test persons in observing the opacity of visible emissions.
- (c) When the emission results from sources specified in 25 Pa. Code §123.1(a).

II. TESTING REQUIREMENTS.**# 005 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

If, at any time, the Department has cause to believe that air contaminant emissions from a source authorized under this plan approval are in excess of the limitations specified in the Plan Approval or limitations established pursuant to any applicable regulation contained in 25 Pa. Code, Subpart C, Article III, the Department may require the permittee to conduct stack testing to determine the actual emission rate(s). The permittee shall perform such tests within 180 days of the date the Department notifies the owner or operator, in writing, of the testing requirement, in accordance with applicable provisions of 25 Pa. Code, Chapter 139 (relating to sampling and testing), the Department's Source Testing Manual (Revision 3.3), and any restrictions or limitations established by the Department in the notification.

006 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

If performance testing is required, such testing shall be conducted as follows [25 Pa. Code §127.12b and §139.11]:

- (a) The permittee shall submit a pre-test protocol electronically to the Department for review at least 90 days prior to the performance of any EPA reference method stack test or portable analyzer test. The permittee may repeat portable analyzer testing without additional protocol approvals provided that the same method and equipment are used. All proposed performance test methods shall be identified in the pre-test protocol and approved by the Department prior to testing.
- (b) The permittee shall notify the Regional Air Quality Manager at least 15 days prior to any performance test so that an observer may be present at the time of the test. Notification shall also be sent to the Division of Source Testing and Monitoring. Notification shall not be made without prior receipt of a protocol acceptance letter from the Department.
- (c) A complete test report shall be submitted to the Department no later than 60 calendar days after completion of the on-site testing portion of an emission test program.
- (d) Pursuant to 25 Pa. Code Section 139.53(b) a complete test report shall include a summary of the emission results on the first page of the report indicating if each pollutant measured is within permitted limits and a statement of compliance or non-compliance with all applicable permit conditions. The summary results will include, at a minimum, the following information:

**SECTION C. Site Level Plan Approval Requirements**

- (1) A statement that the owner or operator has reviewed the report from the emissions testing body and agrees with the findings.
 - (2) Permit number(s) and condition(s) which are the basis for the evaluation.
 - (3) Summary of results with respect to each applicable permit condition.
 - (4) Statement of compliance or non-compliance with each applicable permit condition.
- (e) Pursuant to 25 Pa. Code § 139.3, all submittals shall meet all applicable requirements specified in the most current version of the Department's Source Testing Manual.
- (f) All testing shall be performed in accordance with the provisions of Chapter 139 of the Rules and Regulations of the Department of Environmental Protection.
- (g) All submittals shall be sent electronically to ra-epstacktesting@pa.gov, with CC: to ra-epsystacktesting@pa.gov.
- (h) The permittee shall ensure all federal reporting requirements contained in the applicable subpart of 40 CFR are followed, including timelines more stringent than those contained herein. In the event of an inconsistency or any conflicting requirements between state and the federal, the most stringent provision, term, condition, method or rule shall be used by default.

III. MONITORING REQUIREMENTS.**# 007 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

Inspection of the authorized sources shall be conducted at a minimum of once each day that the permittee or an authorized representative thereof is on site. The inspection shall be conducted for the presence of the following:

- (a) Visible stack emissions;
- (b) Fugitive emissions; and
- (c) Potentially objectionable odors at the property line.

These observations are to ensure continued compliance with source-specific visible emission limitations, fugitive emissions prohibited under 25 Pa. Code §123.1 or §123.2, and malodors prohibited under 25 Pa. Code §123.31.

Observations for visible stack emissions shall be conducted during daylight hours, and all observations shall be conducted while sources are in operation.

If visible stack emissions, fugitive emissions, or potentially objectionable odors are apparent, the permittee shall take corrective action. If any visible emissions are apparent after the correction action, sources of emissions shall not start until the permittee can verify compliance with the opacity standards specified in the permit through methods prescribed in §123.43, such as Method 9 readings taken by a certified visible emissions reader.

008 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

Visible emissions must be measured using either of the following:

- (a) A device approved by the Department and maintained to provide accurate opacity measurements.
- (b) Observers, trained and qualified to measure plume opacity with the naked eye or with the aid of devices approved by the Department.

IV. RECORDKEEPING REQUIREMENTS.**# 009 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

All logs and required records shall be maintained either on site, electronically, or at an alternative location acceptable to the Department, for a minimum of five (5) years and shall be made available to the Department upon request.

**SECTION C. Site Level Plan Approval Requirements****# 010 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

The permittee shall maintain the following comprehensive and accurate records:

- (a) The number of hours per month that the TEG dehydrator operated.
- (b) The amount of fuel used per month in the reboiler and flare.
- (c) Records of maintenance and repairs conducted on TEG dehydrator, reboiler burner and controls, and enclosed flare.
- (d) VOC, HAP, benzene, and methanol emissions on a consecutive 12-month rolling basis from each glycol dehydration unit process vent (defined as the glycol dehydration unit reboiler stack, the glycol regenerator still vent and the flash tank vent) using natural gas flow rate to the glycol dehydration unit, GRI-GLYCalc Version 3.0 or higher or equivalent process simulation software (Promax, Hysys, etc.), and the procedures presented in the associated Technical Reference Manual.
- (e) Records of actual daily natural gas throughput and the average daily glycol circulation rate for the TEG dehydrator.
- (f) Records of each equipment or pipeline blowdown at the facility including the purpose, date, time, and duration of the event; volume of gas vented; and calculated emissions of VOC, HAP, CH₄, methanol, and CO₂e using the most recent gas sampling results.
- (g) Records of annual pipeline liquids production at the facility.
- (h) Records of a fractional gas analysis performed at least once per year on the inlet natural gas to the facility.
- (i) Records of facility-wide inspections including the date, time, name, and title of the observer, along with any corrective action taken as a result.
- (j) Records of any leak detected and associated repair activity through the leak detection and repair (LDAR) or maintenance program.
- (k) Records of a gas fractional analysis performed at least once per year on the inlet natural gas to the facility.
- (l) Records methanol sampling of inlet natural gas and and pipeline liquids.

011 [25 Pa. Code §135.5]**Recordkeeping**

Source owners or operators shall maintain and make available upon request by the Department records including computerized records that may be necessary to comply with §§ 135.3 and 135.21 (relating to reporting; and emission statements). These 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.

V. REPORTING REQUIREMENTS.**# 012 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

Annual emissions reporting shall be conducted as follows:

- (a) Submit by March 1 of each year a source report for the preceding calendar year. The report shall include information for all previously reported sources, new sources which were first operated during the preceding calendar year and sources modified during the same period which were not previously reported.
- (b) Emissions data including, but not limited to the following, shall be reported: particulate matter (PM), particulate matter less than 10 micrometers in diameter (PM₁₀), and particulate matter less than 2.5 micrometers in diameter (PM_{2.5}); volatile organic compounds (VOC); speciated hazardous air pollutants; and total hazardous air pollutants (HAP). A description of the method(s) used to calculate the emissions and the time period over which the calculation is based shall be included. The statement shall also contain a certification by a company officer or the plant manager that the information contained in the statement is accurate.
- (c) A source owner or operator may request an extension of time from the Department for the filing of a source report, and the Department may grant the extension for reasonable cause.

**SECTION C. Site Level Plan Approval Requirements****VI. WORK PRACTICE REQUIREMENTS.**

No additional work practice requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

VII. ADDITIONAL REQUIREMENTS.**# 013 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

The permittee shall construct, operate, and maintain all air contamination sources and air cleaning devices authorized under this Plan Approval in accordance with the manufacturer's specifications and recommended maintenance schedules. Additionally, the owner/operator may not cause or permit the operation of an air contamination source in a manner inconsistent with good operating practices.

014 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

Upon determination by the permittee that the source(s) covered by this Plan Approval are constructed and in compliance with all operative conditions of the Plan Approval, the permittee shall contact the Department to schedule the Initial Operating Permit Inspection.

015 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

Within 120 days after completion of the Initial Operating Permit Inspection and determination by the Department that the source(s) covered by this Plan Approval were constructed in accordance with the Plan Approval and the conditions of the Plan Approval, the permittee shall submit either a State Only Operating Permit application, update to a pending State Only Operating Permit application, or Administrative Amendment application (as appropriate) for the Facility.

016 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

(a) The owner or operator shall report each malfunction that occurs at this facility that poses an imminent and substantial danger to the public health and safety or the environment or which it should reasonably believe may result in citizen complaints to the Department. For purpose of this condition, a malfunction is defined as any sudden, infrequent, and not reasonably preventable failure of air pollution control equipment or source to operate in a normal or usual manner that may result in an increase in the emission of air contaminants. Examples of malfunctions that may result in citizen complaints include but are not limited to: large dust plumes, heavy smoke, a spill or release that results in a malodor that is detectable outside the property of the person on whose land the source is being operated.

(b) When the malfunction poses an imminent and substantial danger to the public health and safety or the environment, the notification shall be submitted to the Department no later than one hour after the incident. All other malfunctions that must be reported under subsection (a) shall be reported to the Department no later than the next business day.

(c) The report shall describe the:

- (i) Name and location of the facility;
- (ii) Nature and cause of the malfunction or breakdown;
- (iii) Time when the malfunction or breakdown was first observed;
- (iv) Expected duration of excess emissions; and
- (v) Estimated rate of emissions.

(d) The owner or operator shall notify the Department immediately when corrective measures have been accomplished.

(e) Subsequent to the malfunction, the owner/operator shall submit a full written report to the Department including the items identified in (c) and corrective measures taken on the malfunction within 15 days, if requested.

(f) The owner/operator shall submit reports on the operation and maintenance of the source to the Regional Air Program Manager at such intervals and in such form and detail as may be required by the Department. Information required in the reports may include, but is not limited to, process weight rates, firing rates, hours of operation, and maintenance schedules.

**SECTION C. Site Level Plan Approval Requirements**

(g) Malfunctions shall be reported to the Department at the following address:

Pennsylvania Department of Environmental Protection
Southwest Regional Office
Air Quality Program
400 Waterfront Drive
Pittsburgh, PA 15222-4745
412-442-4000

017 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

Compliance with mass emission limits established in this authorization may be demonstrated using engineering calculations based on fuel and raw material purchase records, laboratory analyses, manufacturers specifications, AP-42 emission factors, source test results, production and operating records, material balance methods, and/or other appropriate methods, with written Department approval.

018 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

This plan approval authorizes construction and temporary operation of the following:

- One (1) triethylene glycol (TEG) dehydrator with design natural gas capacity of approximately 205 million standard cubic feet per day (MMscfd), equipped with one (1) 2.28 MMBtu/hr natural gas-fired reboiler, a still vent overheads superheater, one (1) three-phase flash separator with flash gas used as reboiler fuel, and a 4.0 MMBtu/hr enclosed flare.
- One (1) 10,000-gallon pipeline liquids storage tank equipped with conservation vent set to release at no less than 0.7 psig of pressure and 0.3 psig of vacuum.
- One (1) 4,500-gallon TEG storage tank.
- Fugitive emissions components.

019 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

Nothing in this Plan Approval relieves the permittee of any obligation to comply with all applicable Federal, state, and local laws and regulations.

020 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

The permittee shall submit requests to extend the temporary operation periods under this Plan Approval at least 15 days prior to the expiration date of any authorized period of temporary operation.

VIII. COMPLIANCE CERTIFICATION.

No additional compliance certifications exist except as provided in other sections of this plan approval including Section B (relating to Plan Approval General Requirements).

IX. COMPLIANCE SCHEDULE.

No compliance milestones exist.

**SECTION D. Source Level Plan Approval Requirements**

Source ID: 201

Source Name: 2.28 MMBTU/HR TEG REBOILER

Source Capacity/Throughput:

2,236.000 CF/HR

Natural Gas

PROC
201STAC
S201**I. RESTRICTIONS.****Emission Restriction(s).**

001 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

Emissions from the reboiler burner shall not exceed 9 ppm NOx and 130 ppm CO, corrected to 3% O2.

[Compliance with this condition shall be demonstrated by utilizing good operating and maintenance practices and installing and operating the burner in accordance with the manufacturer's procedures and specifications.]

II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

**SECTION D. Source Level Plan Approval Requirements**

Source ID: 301

Source Name: 10,000 GALLON PIPELINE LIQUIDS STORAGE TANK

Source Capacity/Throughput:

N/A

PROC
301STAC
S301**I. RESTRICTIONS.**

No additional requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

II. TESTING REQUIREMENTS.**# 001 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

a.) At least once within the 30-day operating period after pipeline liquids first enter the storage tank, the owner or operator shall collect and analyze a pre-storage pressurized pipeline liquids sample to determine the composition (water and C1 thru C6+ fractional analysis), actual vapor pressure (VOCs only), and methanol concentration. The results of the sampling shall be utilized to determine VOC, HAP, methane, and methanol emissions from the tank using ProMax or other appropriate model. If collecting a pressurized pipeline liquids sample is not feasible, an atmospheric pipeline liquids sample is acceptable provided that emissions are modeled using the results of the liquids sample analysis and most recent gas analysis.

b.) Within 30 calendar days of receipt of the laboratory sample results by the owner or operator, the sample and emissions model results shall be submitted to the Department with cover letter via the Department's Public Upload system (<https://greenport.pa.gov/ePermitPublicAccess/PublicSubmission/ValidatePublicSubmission>).

III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

VII. ADDITIONAL REQUIREMENTS.**# 002 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

The pipeline fluids storage tank shall be fitted with a conservation vent set to set to release at no less than 0.7 psig of pressure and 0.3 psig of vacuum as specified in 25 Pa. Code §129.57.

**SECTION D. Source Level Plan Approval Requirements**

Source ID: 401

Source Name: 205 MMSCFD TEG DEHYDRATOR

Source Capacity/Throughput:

8.540 MMCF/HR

Natural Gas

PROC
401CNTL
C401**I. RESTRICTIONS.**

No additional requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

II. TESTING REQUIREMENTS.**# 001 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

a.) At least once within the 30-day operating period after the dehydrator authorized under this plan approval commences operation, the owner or operator shall collect and analyze a pre-dehydrator natural gas sample to determine the methanol concentration using ASTM D7423-17—Standard Test Method for Determination of Oxygenates in C2, C3, C4, and C5 Hydrocarbon Matrices by Gas Chromatography and Flame Ionization Detection (or equivalent). A fractional gas analysis shall also be conducted on the same sample or a second sample collected concurrently. The results of the sampling shall be utilized to determine VOC, HAP, and methanol emissions from the dehydrator using a ProMax, GRI-GlyCalc, or other appropriate model(s).

b.) Within 30 calendar days of receipt of the laboratory sample results by the owner or operator, the sample and emissions model results shall be submitted to the Department with cover letter via the Department's Public Upload system (<https://greenport.pa.gov/ePermitPublicAccess/PublicSubmission/ValidatePublicSubmission>).

III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

VII. ADDITIONAL REQUIREMENTS.**# 002 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

a.) VOC, HAP, and methane emissions from the triethylene glycol (TEG) dehydrator still vent shall be captured and controlled by at least 98% by enclosed flare or by using flash tank off gas as fuel in the reboiler burner.

**SECTION D. Source Level Plan Approval Requirements**

- b.) VOC, HAP, and methane emissions from the TEG dehydrator flash tank shall be controlled by at least 98% by using flash tank off gas as fuel in the reboiler burner.
- c.) The enclosed flare shall be operated at all times when the TEG dehydrator is operated.
- d.) The owner or operator shall document daily visual observations of the continuous presence of a flame the enclosed flare. alternatively, the owner or operator may equip the flare with a heat sensing monitoring device with a continuous recorder that indicates the continuous ignition of the pilot flame. The flare shall be designed and operated in accordance with the applicable requirements in 40 CFR §60.18.

003 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

At all times the owner or operator must operate and maintain natural gas dehydration equipment, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Department which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

**SECTION D. Source Level Plan Approval Requirements**

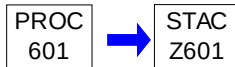
Source ID: 601

Source Name: VENTING/BLOWDOWNS

Source Capacity/Throughput:

N/A

Natural Gas

**I. RESTRICTIONS.**

No additional requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

**SECTION D. Source Level Plan Approval Requirements**

Source ID: 701

Source Name: FUGITIVES

Source Capacity/Throughput:

N/A

Natural Gas

PROC
701STAC
Z701**I. RESTRICTIONS.**

No additional requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

III. MONITORING REQUIREMENTS.**# 001 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

1. For the purposes of this condition, Fugitive Emissions Component means "Any component that has the potential to emit fugitive emissions of methane, Volatile Organic Compounds (VOC), or Hazardous Air Pollutants (HAP) at a natural gas compressor station, processing plant, or transmission station including, but not limited to, valves, connectors, pressure relief devices, open-ended lines, flanges, compressors, instruments, meters, covers, and closed vent systems. Devices that vent as part of normal operations are not considered fugitive sources unless the emission originates from a place other than the vent.

2. For each fugitive emissions component at the facility, the following applies:

a.) No later than 30 days after an emission source commences operation, and at least monthly thereafter, the owner or operator of a facility shall conduct an audible, visual, and olfactory (AVO) inspection.

b.) No later than 60 days after initial startup, and quarterly thereafter, the owner or operator shall conduct an leak detection and repair (LDAR) program using either an OGI camera, a gas leak detector that meets the requirements of 40 CFR Part 60, Appendix A-7, Method 21, or other leak detection methods approved by the Division of Source Testing and Monitoring.

1. The owner or operator may request, in writing, an extension of the LDAR inspection interval from the Air Program Manager of the appropriate DEP Regional Office.

2. Any fugitive emissions components that are difficult-to-monitor or unsafe-to-monitor must be identified in the monitoring plan described in Condition 2(a) below.

c.) The detection devices must be operated and maintained in accordance with manufacturer-recommended procedures, as required by the test method, or a Department-approved method.

d.) A leak is defined as:

1. Any positive indication, whether audible, visual, or odorous, determined during an AVO inspection;

2. Any visible emissions detected by an OGI camera calibrated according to 40 CFR § 60.18 and a detection sensitivity level of 60 grams/hour; or

3. A concentration of 500 ppm calibrated as methane or greater detected by an instrument reading.

e.) For quarterly inspections using a gas leak detector in accordance with 40 CFR Part 60, Appendix A-7, Method 21, the owner or operator may choose to adjust the detection instrument readings to account for the background organic concentration level as determined according to the procedures in Section 8.3.2.

f.) Any leak detected from a fugitive emission component shall be repaired by the owner or operator of the facility as expeditiously as practicable. A first attempt at repair must be attempted within 5 calendar days of detection, and repair must be completed no later than 15 calendar days after the leak is detected unless:

**SECTION D. Source Level Plan Approval Requirements**

1. The owner or operator must purchase parts, in which case the repair must be completed no later than 10 calendar days after the receipt of the purchased parts; or
2. The repair or replacement is technically infeasible, would require a vent blowdown, a compressor station, processing plant or transmission station shutdown, or would be unsafe to repair during operation of the unit, in which case the repair or replacement must be completed during the next scheduled compressor station, processing plant or transmission station shutdown, after a planned vent blowdown or within 2 years, whichever is earlier.

g.) Once a fugitive emission component has been repaired or replaced, the owner or operator must resurvey the component as soon as practicable, but no later than 30 calendar days after the leak is repaired.

1. For repairs that cannot be made during the monitoring survey when the leak is initially found, either a digital photograph must be taken of the component or the component must be tagged for identification purposes.

2. A leak is considered repaired if:

- i. There are no detectable emissions consistent with Section 8.3.2 of 40 CFR Part 60, Appendix A-7, Method 21;
- ii. A leak concentration of less than 500 ppm as methane is detected when the gas leak detector probe inlet is placed at the surface of the component;
- iii. There is no visible leak image when using an OGI camera calibrated at a detection sensitivity level of 60 grams/hour; or
- iv. There is no bubbling at the leak interface using a soap solution bubble test specified in Section 8.3.3 of 40 CFR Part 60, Appendix A-7, Method 21.

IV. RECORDKEEPING REQUIREMENTS.

002 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

Records of each leak detection and repair (LDAR) monitoring survey which shall include:

- a.) The date, start time, and end time of the survey;
- b.) The name of the operator(s) performing the survey;
- c.) The monitoring instrument used;
- d.) The ambient temperature, sky conditions, and maximum wind speed at the time of the survey;
- e.) Any deviations from the monitoring plan or a statement that there were none; and
- f.) Documentation of each fugitive emission including:
 1. The identification of each component from which fugitive emissions were detected;
 2. The instrument reading of each fugitive emissions component that exceeds 500 ppm (as methane);
 3. The status of repair of each component including:
 - i. The repair methods applied in each attempt to repair the component;
 - ii. The tagging or digital photographing of each component not repaired during the monitoring survey in which the fugitive emissions were discovered;
 - iii. The reasons a component was placed on delay of repair;
 - iv. The date of successful repair of the component; and
 - v. The information on the instrumentation or method used to resurvey the component after repair, if it was not completed during the monitoring survey in which the fugitive emissions were discovered.

V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

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

No additional work practice requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).



SECTION E. Source Group Plan Approval Restrictions.

**SECTION F. Alternative Operation Requirements.**

No Alternative Operations exist for this Plan Approval facility.

**SECTION G. Emission Restriction Summary.**

No emission restrictions listed in this section of the permit.



SECTION H. Miscellaneous.



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