RACT COMPLIANCE REPORT



BHE Eastern Gas Transmission and Storage, Inc. / Punxsutawney Compressor Station

Revised January 12, 2024



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BHE Eastern Gas Transmission and Storage, Inc. (EGTS) is submitting this report to the Pennsylvania Department of Environmental Protection (PADEP) for their Compressor Station located in Jefferson County, Pennsylvania (Punxsutawney Compressor Station).

The Punxsutawney Compressor Station is located at 88 Laska Rd, Jefferson County, Pennsylvania. The Punxsutawney Compressor Station operates under Title V Permit No. 33-00140, which was most recently revised on February 22, 2021. The facility is currently a major source with respect to nitrogen oxides (NO_X) and volatile organic compounds (VOC). As such, the Punxsutawney Compressor Station is subject to the Reasonably Available Control Technology (RACT) requirements in 25 Pa. Code §§129.111-129.115. This report includes the applicable notifications and submittals to comply with the RACT requirements and is submitted prior to the compliance date of December 31, 2022, referenced in 25 Pa. Code §129.115(a)(1)(i).

This report contains a Plan Approval application for the installation of selective catalytic reduction (SCR) controls on Engines 1 and 2 (Sources 131 and 132) to comply with RACT requirements. As such, this report contains a petition for an alternative compliance schedule in accordance with 25 Pa. Code 129.114(I). This report also contains an alternative RACT proposal for fugitive emissions in accordance with 25 Pa. Code 129.114(I). This 129.114(c).

This report is organized as follows:

- Section 2: RACT Applicability
- Section 3: Regulation Review
- Section 4: Compliance Schedule
- Section 5: Alternative RACT Requirement
- Appendix A: Emission Calculations
- > Appendix B: General Information Form
- Appendix C: Plan Approval Forms
- ► Appendix D: Compliance Review Form
- Appendix E: Municipal Notifications

This section contains a summary of RACT applicability for the Punxsutawney Compressor Station

2.1 RACT Notification

This section contains the information required by the RACT notification in 25 Pa. Code §129.115(a) outlined as follows:

- ► Tables 2-1 and 2-2 contain the required information for the applicable equipment to satisfy 25 Pa. Code 129.115(a)(5) and (7). Table 2-3 summarizes each RACT III citation referenced in Tables 2-1 and 2-2.
- For sources exempt per 25 Pa. Code 129.111(c), Appendix A contains potential to emit calculations to satisfy 25 Pa. Code 129.115(a)(7)(ii).

This submittal also includes the proposed project to install SCR (and associated ammonia storage tank) to meet the presumptive limits for Engines 1 and 2.

Source ID ¹	Source Description	Equipment Make	Equipment Model	NO _x RACT Requirement	Citation	NO _x RACT Compliance Demonstration	Citation		
034	Boiler 1 (5.5 MMBtu/Hr)	AJAX	WGFD-5500	N/A - Rating less than 20 MMBtu/hr 129.112(c)(4)		N/A - Work practices	129.112(c)(4)		
035	Misc. Combustion Units (<2.5 MMBtu/Hr)	N/A	N/A	N/A - Exempt	129.111(c)	N/A - Exempt	129.111(c)		
131	Compressor Engine 1 (4200 HP)	Dresser Rand	TV-10	0.6 g/bhp-hr	129.112(g)(3)(ii)(A)	Emissions source test	129.115(b)(6) 129.115(e)(3)		
132	Compressor Engine 2 (4200 HP)	Dresser Rand	TV-10	0.6 g/bhp-hr	129.112(g)(3)(ii)(A)	Emissions source test	129.115(b)(6) 129.115(e)(3)		
133	Auxiliary Gen 1 (550 HP)	Caterpillar	SR-4 G3508TA	N/A - Emergency generator	129.112(c)(10)	N/A - Work practices	129.112(c)(10)		
134	Misc. Storage Tanks	N/A	N/A		N/A – Not a NO	k Source			
136	Compressor Engine 3 (4735 HP)	Caterpillar	G3616	0.6 g/bhp-hr	129.112(g)(3)(ii)(A)	Emissions source test	129.115(b)(6) 129.115(e)(3)		
137	Compressor Turbine	Solar Centaur	50-6200LS	42 ppmvd @ 15% oxygen	129.112(g)(2)(v)(A)	Emissions source test	129.115(b)(6) 129.115(e)(3)		
139	Line Heater	Bruest Hot Cat	HC-2800	N/A - Rating less than 20 MMBtu/hr	129.112(c)(4)	N/A - Work practices	129.112(c)(4)		
P101	Facility Pumps, Valves, Flanges, etc.	N/A	N/A	N/A – Not a NOx Source					
P102	Parts Washer (Degreasing Unit)	N/A	N/A	N/A – Not a NOx Source					

Table 2-1. NO_x RACT Information

1. All sources located at the Punxsutawney Compressor Station.

Table 2-2. VOC RACT Information

Source ID ¹	Source Description	Equipment Make	Equipment Model	VOC RACT Requirement	Citation	VOC RACT Compliance Demonstration	Citation
034	Boiler 1 (5.5 MMBtu/Hr)	AJAX	WGFD-5500	N/A - Exempt	129.111(c)	N/A - Exempt	129.111(c)
035	Misc. Combustion Units (<2.5 MMBtu/Hr)	N/A	N/A	N/A - Exempt	129.111(c)	N/A - Exempt	129.111(c)
131	Compressor Engine 1 (4200 HP)	Dresser Rand	TV-10	0.5 g/bhp-hr	129.112(g)(3)(ii)(B)	Emissions source test	129.115(b)(6) 129.115(e)(3)
132	Compressor Engine 2 (4200 HP)	Dresser Rand	TV-10	0.5 g/bhp-hr	129.112(g)(3)(ii)(B)	Emissions source test	129.115(b)(6) 129.115(e)(3)
133	Auxiliary Gen 1 (550 HP)	Caterpillar	SR-4 G3508TA	N/A - Emergency engine	129.112(c)(10)	N/A - Work practices	129.112(c)(10)
134	Misc. Storage Tanks	N/A	N/A	N/A - Exempt	129.111(c)	N/A - Exempt	129.111(c)
136	Compressor Engine 3 (4735 HP)	Caterpillar	G3616	0.5 g/bhp-hr	129.112(g)(3)(ii)(B)	Emissions source test	129.115(b)(6) 129.115(e)(3)
137	Compressor Turbine	Solar Centaur	50-6200LS	9 ppmvd @ 15% oxygen	129.112(g)(2)(v)(B)	Emissions source test	129.115(b)(6) 129.115(e)(3)
139	Line Heater	Bruest Hot Cat	HC-2800	N/A - Exempt	129.111(c)	N/A - Exempt	129.111(c)
P101	Facility Pumps, Valves, Flanges, etc.	N/A	N/A	N/A - < 2.7 TPY VOC	129.111(c)(3)	N/A - Work Practices	129.111(c)(3)
P102	Parts Washer (Degreasing Unit)	N/A	N/A	N/A - Exempt	129.111(c)	N/A - Exempt	129.111(c)

1. All sources located at the Punxsutawney Compressor Station.

Table 2-4. RACT Citation Summary

RACT Citation	Citation Summary
129 111(c)	Sections 129.112—129.114 do not apply to the owner and operator of a NOx (or VOC)
123.111(0)	air contamination source that has the potential to emit less than 1 TPY of NOx (or
	VOC) located at a major NOx (or VOC) emitting facility subject to subsection (a) or (b).
	A VOC air contamination source located at a major VOC emitting facility that has the
129.112(c)(2)	potential to emit less than 2.7 TPY of VOC and is subject to 129.111 shall install,
	maintain, and operate the source in accordance with the manufacturer's specification
	with good operating practices.
	A boiler or other combustion source with a rated heat input less than 20 million Btu/hr
129.112(c)(4)	located at a major NOx emitting facility or major VOC emitting facility and is subject to
	129.111 shall install, maintain, and operate the source in accordance with the
	manufacturer's specification with good operating practices.
	An emergency standby engine operating less than 500 hours in a 12-month rolling
129.112(c)(10)	period located at a major NOX emitting facility or major VOC emitting facility and is
	subject to 129.111 shall install, maintain, and operate the source in accordance with
	the manufacturer's specification with good operating practices.
	A combined cycle or combined neat and power combustion turbine with a rated output
129.112(g)(2)(v)(A)	equal to of greater than 4,100 bills and less than 60,000 bills shall comply with the product A_{100} and A_{1
	presumptive RACT emission initiation of 42 ppm/vd NO _x @ 15% 0xygen when ming natural das or a noncommercial dascours fuel
	A simple cycle or regenerative cycle combustion turbine with a rated output equal to or
$129 \ 112(a)(2)(y)(B)$	a simple cycle of regenerative cycle combustion tarbine with a rated output equal to of greater than 4 100 bbp and less than 60 000 bbp shall comply with the presumptive
123.112(9)(2)(4)(0)	RACT emission limitation of 9 nnmvd VOC (as pronane) \oplus 15% ovvgen when firing
	natural das or a noncommercial daseous fuel
	A lean burn stationary internal combustion engine with a rating equal to or greater
129.112(g)(3)(ii)(A)	than 3.500 bhp shall comply with the presumptive RACT emission limitation of 0.6
	grams NOx/bhp-hr when firing natural gas or a noncommercial gaseous fuel.
	A lean burn stationary internal combustion engine with a rating equal to or greater
129.112(g)(3)(ii)(B)	than 3,500 bhp shall comply with the presumptive RACT emission limitation of 0.5
	grams VOC /bhp-hr when firing natural gas or a noncommercial gaseous fuel, liquid
	fuel, or dual-fuel.
	The owner or operator of a VOC air contamination source with a potential emission
129 114(c)	rate equal to or greater than 2.7 tons of VOC per year that is not subject to § 129.112
123.117(0)	located at a major VOC emitting facility subject to § 129.111 shall propose a VOC
	RACT requirement or RACT emission limitation in accordance with subsection (d).
	For an air contamination source without a CEMS, monitoring and testing in accordance
129.115(b)(6)	with an approved emissions source test that meets the requirements of Chapter 139,
1201110(0)(0)	Subchapter A. The source test shall be conducted to demonstrate initial compliance
	and subsequently on a schedule set forth in the applicable permit.
	An owner or operator of an air contamination source subject to this section and §§
	129.111, 129.112 and 129.113 (relating to facility-wide or system-wide NOx emissions
	averaging plan general requirements) may request a waiver from the requirement to
129.115(e)(3)	demonstrate compliance with the applicable emission limitation listed in § 129.112 if
	the request for a waiver demonstrates to the satisfaction of the Department or
	appropriate approved local air pollution control agency that the test results show that
	the source's rate or emissions is in compliance with the source's applicable NOX
	emission limitation or VOC emission limitation.

2.2 Source Test Waiver

For sources at the Punxsutawney Compressor Station subject to emissions source testing per 25 Pa. Code 129.115(b)(6), a source test shall be conducted to demonstrate initial compliance and subsequently on a schedule set forth in the applicable permit. Alternatively, an owner or operator may request a waiver from the requirement to demonstrate compliance with the applicable emission limitations.

EGTS is submitting this waiver to fulfill requirements of 25 Pa. Code 129.115(e)(1) by the deadline (December 31, 2022) in 25 Pa. Code 129.115(e)(1)(i).

This waiver contains the emissions source test results that were performed in accordance with the requirements of Chapter 139, Subchapter A. The emissions source test results are listed in Table 2-4, which demonstrate compliance with the applicable emission limits.

Source ID	Source Description	Emissions Source Test Date	NO _x Result (g/bhp-hr)	NOx Limit (g/bhp-hr)	VOC Result (g/bhp-hr)	VOC Limit (g/bhp-hr)
131	Engine 1	9/17/2021	1.3	2.0 ¹	<0.1	0.5
132	Engine 2	9/16/2021	1.1	2.0 ¹	<0.1	0.5
136	Engine 3	9/15/2021	0.45	0.6	<0.1	0.5
137	Turbine 1	9/14/2021	10.4 ppm	42 ppm	<0.1 ppm	9 ppm

Table 2-4 Source Test Summary

1. The limit referenced is the proposed interim emission limit. See Section 4.

This section of the report addresses the applicability of the proposed project at the Punxsutawney Compressor Station to permitting programs and emission standards, including the following:

- Prevention of Significant Deterioration (PSD) and/or Non-attainment New Source Review (NNSR) [both parts of the federal New Source Review (NSR) as incorporated by reference under 25 PA Code 127.81-127.83 for PSD and implemented under 25 PA Code 127.291-127.218for NNSR];
- Title V of the 1990 Clean Air Act Amendments (as incorporated and implement under 25 PA Code 127.501-127.543);
- New Source Performance Standards (NSPS);
- ▶ National Emission Standards for Hazardous Air Pollutants (NESHAP); and
- Pennsylvania State Implementation Plan (SIP) regulations.

3.1 PSD and NNSR Analysis

The Federal NSR program applies to major stationary sources. The NSR permitting regulations are comprised of two programs: 1) PSD for projects located in areas where specified pollutant levels have met National Ambient Air Quality Standards (NAAQS); and 2) NNSR for projects located in areas where pollutant levels have not attained the corresponding NAAQS.

The proposed project includes the installation of SCR on Engines 1 and 2. As the proposed project is limited to the installation of a control device to meet RACT and the existing engines will not be modified (nor is the proposed project intended to increase utilization or horsepower of the engines), there is no projected emission increase for the project. Emissions of NO_X will be decreased to meet the RACT emission limits. Given the location of the SCR controls (i.e., downstream of the oxidation catalyst), there is not expected to be an increase in particulate emissions from the engines as a result of the project.

Since the proposed project results in an overall emission decrease, federal NSR permitting is not trigger by this project.

3.2 Title V Permitting

The Punxsutawney Compressor Station will remain a Title V facility after the proposed project. EGTS will modify the Title V permit as necessary in corporate the RACT project and applicability once the project is completed.

3.3 Federal Emissions Standards

Two types of federal emission standards could apply to certain operations being permitted as part of this project. These emission standards are: New Source Performance Standards (NSPS) codified in 40 CFR 60 and National Emission Standards for Hazardous Air Pollutants (NESHAP) standards codified in 40 CFR 63.

3.3.1 National Emission Standards for Hazardous Air Pollutants (NESHAP or MACT)

The original NESHAPs promulgated prior to the Clean Air Act Amendments (CAAA) of 1990 are found in 40 CFR Part 61 and apply to specific HAPs. The Punxsutawney Compressor Station is not subject to any Part 61

requirements and there are no new proposed or promulgated Part 61 requirements triggered by this application.

NESHAP promulgated under 40 CFR Part 63, also referred to as Maximum Achievable Control Technology (MACT) standards, apply to specific source categories that are considered major sources or area sources of HAP. A major source of HAP is defined as a source with the facility-wide potential to emit any single HAP of 10 tons per year or more or with a facility-wide potential to emit total HAP of 25 tons per year or more. The Punxsutawney Compressor Station is classified as a major HAP facility.

The proposed project is the installation of controls on Engines 1 and 2. The only potentially applicable NESHAP for these units is Subpart ZZZZ – Stationary Reciprocating Internal Combustion Engines Stationary (RICE). The proposed project does not constitute reconstruction of either engine as the project is the installation of controls. Therefore, no change in applicability is triggered by the proposed project.

3.3.2 New Source Performance Standards

Pennsylvania has received delegation from EPA to regulate facilities subject to NSPS. Regulatory requirements for facilities subject to NSPS are contained in Pennsylvania SIP in 25 Pa Code §122 and 40 CFR Part 60.

The potential applicability of NSPS standards to the proposed project at the Punxsutawney Compressor Station are:

- ▶ 40 CFR Part 60 Subpart JJJJ Stationary Spark Ignition Internal Combustion Engine
- ▶ 40 CFR Part 60 Subpart OOOOa Crude Oil and Natural Gas Production, Transmission, and Distribution

3.3.2.1 NSPS Subpart JJJJ – Stationary Spark Ignition Internal Combustion Engines

Subpart JJJJ, Standards of Performance for Stationary Spark Ignition Internal Combustion Engines, applies to manufacturers, owners, and operators of stationary spark (SI) engines. The requirements for SI engines with a maximum power rating greater than or equal to 500 hp (except lean burn engines 500 hp \leq hp < 1,350) apply to owner/operators of such engines ordered on or after July 1, 2007. All the engines at the Punxsutawney Compressor Station were installed prior to the applicability date and thus are not currently subject to Subpart JJJJ. The proposed project is the installation of controls on Engines 1 and 2 and no emission increase is occurring as a result of the project. Therefore, the proposed project does not trigger modification or reconstruction under Subpart JJJJ.

3.3.2.2 NSPS Subpart OOOOa — Crude Oil and Natural Gas Facilities

Subpart OOOOa – Standards of Performance for Crude Oil and Natural Gas Production, Transmission, and Distribution, establishes emission standards and compliance schedules for the control of volatile organic compounds (VOC) and sulfur dioxide (SO₂) emissions from affected facilities in the crude oil and natural gas production source category that commence construction, modification, or reconstruction after September 18, 2015. This rule applies to:

- Gas wellheads
- Centrifugal compressors located between the wellhead and the point of custody transfer to the natural gas transmission and storage segment
- Reciprocating compressors located between the wellhead and the point of custody transfer to the natural gas transmission and storage segment

- Continuous bleed natural gas-driven pneumatic controllers with a bleed rate of > 6 scfh located between the wellhead and the point of custody transfer to the natural gas transmission and storage segment (excluding natural gas processing plants)
- Continuous bleed natural gas-driven pneumatic controllers located at natural gas processing plants
- Storage vessels
- Sweetening units located onshore that process natural gas produced from either onshore or offshore wells

The proposed project does not include any affected facilities under the Subpart OOOOa. Therefore, the regulation does not apply to the proposed project.

EPA has recently proposed revisions to Subpart OOOOa, as well as new Subparts OOOOb and OOOOc. Applicability to those regulations will be evaluated at a later date once they are finalized.

3.4 Pennsylvania SIP Regulations

The Pennsylvania Code contains regulations that fall under two (2) main categories: the regulations that are generally applicable (e.g., permitting requirements), and those that have specific applicability (e.g., sulfur compound emissions from combustion units). The generally applicable requirements are straightforward (e.g., filing of emission statements) and, as such, are not discussed in further detail. The specific requirements associated with the proposed project at the Punxsutawney Compressor Station are discussed in the following section.

3.4.1 25 Pa Code §123.1 and 123.2

25 Pa Code §123.1 and 123.2 *Prohibition of Certain Fugitive Emissions* and *Fugitive Particulate Matter*, both state exceptions to fugitive emissions sources and methods for controlling fugitive emissions. This regulation applies to the facility in general.

3.4.2 25 Pa Code §123.11 and 123.13

25 Pa Code §123.11 *Particulate Emissions: Combustion Units* defines particulate matter emissions for combustion units. Combustion units are defined in §121.1 as stationary equipment used to burn fuel primarily for the purpose of producing power or heat by indirect heat transfer such as boilers. This definition does not apply to the engines at the Punxsutawney Compressor Station. As such, the particulate matter emissions limitations for processes in 25 Pa Code §123.13 *Particulate Emissions: Processes* apply to these units instead. EGTS will comply with this regulation as incorporated into the Title V permit.

3.4.3 25 Pa Code § 123.21

25 Pa Code §123.21 *Sulfur Compound Emissions: General* states that the concentration of sulfur oxides in the effluent gas may not exceed 500 ppmvd. The engines at Punxsutawney Compressor Station combust pipeline quality natural gas and the sulfur oxide emissions are expected to be well below this concentration level in the combustion exhaust.

3.4.4 25 Pa Code § 123.31

25 Pa Code §123.31 *Odor Emissions* prohibits the emission of malodorous air contaminants from any source that are detectable outside the facility fence line. This regulation applies to the facility in general. EGTS will

take measures to minimize odor from the Punxsutawney Compressor Station operations by combusting pipeline quality natural gas fuel only and using good engineering practices.

3.4.5 25 Pa Code § 123.41 and 123.43

25 Pa Code §123.41 *Visible Emissions: Limitations* states that a facility may not emit visible emissions equal to or greater than 20% for a period or periods aggregating more than 3 minutes in any 1 hour, or equal to or greater than 60% at any time. This standard applies to the proposed combustion units at the Punxsutawney Compressor Station. The use of pipeline quality natural gas as fuel will ensure compliance with this requirement.

3.4.6 25 Pa Code § 127.11

25 Pa Code §127.11 outlines requirements for Plan Approvals required to authorize construction or modification of air contamination sources. Construction, installation, modification, or reactivation of air contaminant sources or air pollution control devices is prohibited unless otherwise approved by the Department. The installation of SCR at the Punxsutawney Compressor Station is subject to Plan Approval permitting requirements under this requirement. As the proposed project is limited to installing controls and the sources are not being modified, BAT is not applicable.

3.4.7 25 Pa Code § 129.111

25 PA Code §129.111 establishes control standards for major stationary sources of NO_X and VOC under the Reasonably Available Control Technology (RACT) program. Major stationary sources of NO_X and VOC are defined in 25 PA Code §121.1. The Punxsutawney Compressor Station is located in the Ozone Transport Region (OTR), and therefore the applicable major source thresholds are 100 tons per year of NO_X and 50 tons per year of VOC.

The Punxsutawney Compressor Station has potential VOC emissions greater 50 tons per year and NO_X in excess of 100 tpy. Therefore, the Punxsutawney Compressor Station is considered a "major NO_X and VOC emitting facility" pursuant to 25 Pa Code §121.1. The requirements for RACT are outlined in Section 2 of this report.

This Plan Approval application is being submitted to:

- Comply with presumptive RACT standards through the installation of controls and propose an alternative compliance schedule in accordance with 25 Pa Code §129.114(I), which is included in Section 4 of this report and
- Propose a case-by-case RACT requirement for fugitive emissions in accordance with 25 Pa Code §129.114(c), which is included in Section 5.

4. COMPLIANCE SCHEDULE

Per 25 Pa Code §129.114(I), the owner and operator of a facility proposing to comply with the applicable RACT requirement or RACT emission limitation through the installation of an air cleaning device may submit a petition requesting an alternative compliance schedule. This section contains the required elements in the petition for the alternative compliance schedule and is submitted by December 31, 2022, in accordance with 25 Pa Code §129.114(I)(1)(i).

The required elements in the petition are:

(*i*) A description, including make, model and location, of each air contamination source subject to a RACT requirement or RACT emission limitation in one or more of subsections (a)—(c).

The sources subject to this petition are Engines 1 and 2, which are 4,200 horsepower (hp) Dresser Rand TV-10 natural gas fired engines located at the Punxsutawney Compressor Station.

(ii) A description of the proposed air cleaning device to be installed.

Selective catalytic reduction (SCR) systems will be installed on both units to meet the NO_X RACT limit. The system will inject ammonia into the exhaust stream between the oxidation catalyst and SCR, which will react with the NO_X in the exhaust over a catalyst. The SCR system also includes an ammonia storage tank.

(iii) A schedule containing proposed interim dates for completing each phase of the required work to install the air cleaning device described in subparagraph (ii).

EGTS has proposed the following schedule (note that EGTS requests that changes to the schedule be allowed with written approval by the Department):

- Commencement of Construction of SCR System: By date in notification submitted by EGTS no later than 60 days from Plan Approval Issuance
- Startup and commissioning of engines with SCR installed: By date in notification submitted by EGTS no later than 120 days from Plan Approval Issuance
- Stack Testing: No later than 180 days of completion of construction and first fire

(iv) A proposed interim emission limitation that will be imposed on the affected air contamination source until compliance is achieved with the applicable RACT requirement or RACT emission limitation. EGTS proposes the existing NO_x emission limit in the Title V permit for the engines (2.0 g/bhp-hr) as the interim emission limitation. Note that the proposed limit is lower than the presumptive RACT 2 limit.

(v) A proposed final compliance date that is as soon as possible but not later than 3 years after the approval of the petition by the Department or the appropriate approved local air pollution control agency. If the petition is for the replacement of an existing source, the final compliance date will be determined on a caseby-case basis. The approved petition shall be incorporated in an applicable operating permit or plan approval.

EGTS is proposing a final compliance date (i.e., the completion of testing to demonstrate compliance) of May 31, 2025. Note that this assume a Plan Approval authorizing the proposed project can be issued by November 12, 2023.

5. ALTERNATIVE RACT REQUIREMENT

This section contains the alternative RACT requirement (i.e., case by case RACT) for source P101 (facility fugitive emissions from pumps, valves, flanges, etc.). Note that the definition of natural gas compression and transmissions facility fugitive VOC air contamination source in 25 Pa Code §121.1 defines the fugitive source as group of components associated with an individual stationary source. As such, applicability is limited to those sources greater than 2.7 tpy VOC as noted in Appendix A. This alternative RACT requirement proposal is being submitted by December 31, 2022, in accordance with 25 Pa Code §129.114(d)(i).

As the emission source in question is fugitive emissions at a compressor station, EGTS is accepting the analysis conducted for the recently finalized rules for existing sources in the natural gas industry (specifically, the fugitive emissions components for compressor stations in 25 Pa Code §129.127). This analysis is consistent with the procedures in 25 Pa Code §129.92(b) to meet the requirements of 25 Pa Code §129.114(d)(3).

As the alternative RACT requirement proposal to meet 25 Pa Code §129.114(d)(6) and (7), EGTS will implement a leak detection and repair program consistent with 25 Pa Code §129.127(e)-(I). Recordkeeping consistent with 25 Pa Code §129.130(g) is proposed. Reporting will align with existing Title V compliance reporting.

EGTS will conduct an initial inspection within 60 days of approval of the alternative RACT requirement or November 12, 2023, whichever is earlier. There is no interim schedule required as compliance can be demonstrated in a timely manner after approval and no equipment or process changes are required.

Eastern Gas Transmission and Storage, Inc. Facility ID# 55-0629203-13

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Facility Summary - Punxsutawney Station (Tons/Year)

Source	Source ID	NOx	со	VOC (No HAPs)	VOCs (Includes HAPs) *	PM10**	SOx	Total HAPS	PM2.5**	NH3	CO2	CH4	N2O	Annual Fuel Use (Mcf)
Boiler 1	034	2.41	2.02	0.13	0.18	0.05	0.01	0.05	0.05	0.01	2,818.05	0.05	0.01	48,180.00
Misc Combustion Units	035	0.17	0.14	0.01	0.01	0.00	0.00	0.00	0.00	0.00	194.70	0.00	0.00	3,328.80
Engine #1	131	24.33	113.44	20.28	29.87	4.94	0.08	9.59	4.94	0.49	15,063.75	0.28	0.03	257,544.00
Engine #2	132	24.33	113.44	20.28	29.87	4.94	0.08	9.59	4.94	0.49	15,063.75	0.28	0.03	257,544.00
Auxiliary Generator 1	133	1.23	0.96	0.04	0.06	0.00	0.00	0.02	0.00	0.00	35.39	0.00	0.00	605.00
Tank Emissions ***	134			0.10	0.10									
Engine #3	136	25.35	11.40	11.40	20.59	0.01	0.08	9.19	0.01	0.00	15,691.40	0.30	0.03	268,275.00
New Turbine	137	13.86	2.84	1.44	1.70	1.67	1.42	0.26	1.67	0.00	29,558.76	0.56	0.06	505,364.40
Line Heater	139	1.21	1.02	0.07	0.09	0.02	0.01	0.02	0.02	0.00	1,416.61	0.03	0.00	24,219.65
Fugitive Emissions	P101			1.98	1.98			0.22						
Blowdown Emissions	P201			2.70	3.70			1.00						
Totals (ton/year)		92.90	245.26	67.59	95.01	11.64	1.67	31.12	11.64	0.99	79,842.41	1.50	0.15	1,365,060.85

** Insignificant Source, emissions captured in fugitive emissions.

Speciated HAPs (Tons/Year)

	Source										
Source	ID	Formaldehyde	Benzene	Toluene	Ethylbenzene	Xylene	n-Hexane	Acetaldehyde	Acrolein	Methanol	Total
Boiler1	034	0.00	0.00	0.00	0.00	0.00	0.04	0.00	0.00	0.00	0.05
Misc Combustion Units	035					Negligible					0.00
Engine1	131	7.11	0.25	0.12	0.01	0.03	0.06	1.00	1.00	0.00	9.59
Engine2	132	7.11	0.25	0.12	0.01	0.03	0.06	1.00	1.00	0.00	9.59
AuxGen	133	0.02	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.02
Tank Emissions ***	134				τ	Jnable to speciate HA	.Ps.				
Engine3	136	7.08	0.06	0.05	0.01	0.02	0.15	1.12	0.69	0.00	9.19
New Turbine	137	0.18	0.00	0.03	0.01	0.02	0.01	0.01	0.01	0.00	0.27
Line Heater	139	0.00	0.00	0.00	0.00	0.00	0.02	0.00	0.00	0.00	0.02
Fugitive Emissions	P101		Unable to speciate HAPs.							0.22	
Blowdown Emissions	P201	Unable to speciate HAPs.							1.00		
Totals (ton/year)	Totals (ton/year) 21.50 0.56 0.34 0.04 0.11 0.31 3.13 2.70 0.00							30.13			

Note:

* VOCs (includes HAPs) calculated for AIMS and Fee Calculation only. This total is not to be used to determine compliance with permitted VOC emission limits unless specifically defined as such in the station's operating permit.

**All references to PM2.5 and PM10 are filterable.

*** Tank emissions are maximum potential emissions. Calculations were included with the operating permit application.

Eastern Gas Transmission and Storage, Inc. Facility ID# 55-0629203-13

Source ID - 131 Engine #1 - 4,200 HP Dresser Rand TV-10

Date Installed:	1991	Fuel:	Natual Gas	2L		
SCC:	20300201	*Note: Fuel average heating value of 1000Btu/cf				

Annual fuel usage	257,544.00 MCF
Annual operating hours	8,760.00 Hours
Annual operating days	365 Days
Rated horsepower	4,200 bhp

Max Fuel Rate :	29.4	mmBtu/hr			Potential	Emissions	1	Permit	Limits
Pollutant	CAS	REF	Emission Factor	Units	lb/hr	tons/yr	Calc Method	lb/hr	tons/yr
NOx	n/a	1	0.6	g/bhp-hr	5.56	24.33		18.5	81.03
CO	n/a	1						25.9	113.44
VOC	n/a	1	0.5	g/bhp-hr	4.63	20.28		8.3	36.35
PM 10	n/a	2	0.0384	lb/MMBtu	1.13	4.94	15		
SO2	n/a	2	0.000588	lb/MMBtu	0.02	0.08	15		
Formaldehyde	50-00-0	2	0.0552	lb/MMBtu	1.62	7.11	15		
Benzene	71-43-2	2	0.00194	lb/MMBtu	0.06	0.25	15		
Toluene	108-88-3	2	0.000963	lb/MMBtu	0.03	0.12	15		
Ethylbenzene	100-41-4	2	0.000108	lb/MMBtu	0.00	0.01	15		
Xylene	1330-20-7	2	0.000268	lb/MMBtu	0.01	0.03	15		
n-Hexane	110-54-3	2	0.000445	lb/MMBtu	0.01	0.06	15		
Acetaldehyde	75-07-0	2	0.00776	lb/MMBtu	0.23	1.00	15		
Acrolein	107-02-8	2	0.00778	lb/MMBtu	0.23	1.00	15		
PM2.5	n/a	2	0.0384	lb/MMBtu	1.13	4.94	15		
PM-CON	n/a	2	0.00991	lb/MMBtu	0.29	1.28	15		
CO2	124389	3	116.98	lb/MMBtu	3,439.21	15,063.75	15		
CH4	74828	4	0.0022	lb/MMBtu	0.06	0.28	15		
N2O	10024972	4	0.00022	lb/MMBtu	0.01	0.03	15		
NH3		5	10	ppmvd	0.11	0.49			

Total Criteria :	242.95	tons/yr
Total HAPS:	9.59	tons/yr

Notes: 1. TVOP Limits/RACT Limits. PTE based on most stringent

2. From US EPA's AP-42 Table 3.2-1

3. From 40 CFR 98 Subpart C Table C-1

1 kg = 2.20462 lb

4. From 40 CFR 98 Subpart C Table C-2

1 kg = 2.20462 lb

5. Ammonia slip rate

Eastern Gas Transmission and Storage, Inc. Facility ID# 55-0629203-13

Source ID - 132 Engine #2 - 4,200 HP Dresser Rand TV-10

Date Installed:	Date Installed: 1991		Natual Gas	2L
SCC:	20300201	*Note: Fuel average heating	ng value of 1000Btu/cf	

Annual fuel usage	257,544.00 MCF
Annual operating hours	8,760.00 Hours
Annual operating days	365 Days
Rated horsepower	4,200 bhp

Max Fuel Rate :	Fuel Rate :29.4 mmBtu/hr				Potential	Potential Emissions		Permit Limits	
Pollutant	CAS	REF	Emission Factor	Units	lb/hr	tons/yr	Calc Method	lb/hr	tons/yr
NOx	n/a	1	0.6	g/bhp-hr	5.56	24.33		18.5	81.03
СО	n/a	1						25.9	113.44
VOC	n/a	1	0.5	g/bhp-hr	4.63	20.28		8.3	36.35
PM 10	n/a	2	0.0384	lb/MMBtu	1.13	4.94	15		
SO2	n/a	2	0.000588	lb/MMBtu	0.02	0.08	15		
Formaldehyde	50-00-0	2	0.0552	lb/MMBtu	1.62	7.11	15		
Benzene	71-43-2	2	0.00194	lb/MMBtu	0.06	0.25	15		
Toluene	108-88-3	2	0.000963	lb/MMBtu	0.03	0.12	15		
Ethylbenzene	100-41-4	2	0.000108	lb/MMBtu	0.00	0.01	15		
Xylene	1330-20-7	2	0.000268	lb/MMBtu	0.01	0.03	15		
n-Hexane	110-54-3	2	0.000445	lb/MMBtu	0.01	0.06	15		
Acetaldehyde	75-07-0	2	0.00776	lb/MMBtu	0.23	1.00	15		
Acrolein	107-02-8	2	0.00778	lb/MMBtu	0.23	1.00	15		
PM2.5	n/a	2	0.0384	lb/MMBtu	1.13	4.94	15		
PM-CON	n/a	2	0.00991	lb/MMBtu	0.29	1.28	15		
CO2	124389	3	116.98	lb/MMBtu	3,439.21	15,063.75	15		
CH4	74828	4	0.0022	lb/MMBtu	0.06	0.28	15		
N2O	10024972	4	0.00022	lb/MMBtu	0.01	0.03	15		
NH3		5	10	ppmvd	0.11	0.49			

Total Criteria :	235.85	tons/yr
Total HAPS:	9.59	tons/yr

Notes: 1. TVOP Limits/RACT Limits. PTE based on most stringent 2. From US EPA's AP-42 Table 3.2-1 3. From 40 CFR 98 Subpart C Table C-1 1 kg = 2.20462 lb 4. From 40 CFR 98 Subpart C Table C-2

1 kg = 2.20462 lb

5. Ammonia slip rate

Eastern Gas Transmission and Storage, Inc. Facility ID# 55-0629203-13

Source ID - 136 Engine #3 - 4,735 HP Caterpillar G3616

			-•	
Date Installed:	2002	Fuel:	Natual Gas	4L
SCC:	20300201	*Note: Fuel average he	eating value of 1000B	tu/cf

Annual fuel usage	268,275.00 MCF
Annual operating hours	8,760.00 Hours
Annual operating days	365 Days
Rated horsepower	4,375 bhp

Max Fuel Rate :	30.625 mmBtu/hr				Potential E	Potential Emissions		Permit	Limits *
Pollutant	CAS	REF	Emission Factor	Units	lb/hr	tons/yr	Calc Method	lb/hr	tons/yr
NOx	n/a	1	0.6	g/bhp-hr	5.79	25.35		8.35	36.6
СО	n/a	1						2.61	11.4
VOC	n/a	1	0.5	g/bhp-hr	4.82	21.12		2.61	11.4
PM 10	n/a	2	0.0000771	lb/MMBtu	0.00	0.01	15		
SO2	n/a	2	0.000588	lb/MMBtu	0.02	0.08	15		
Formaldehyde	50-00-0	3	0.0528	lb/MMBtu	1.62	7.08	15		
Benzene	71-43-2	3	0.00044	lb/MMBtu	0.01	0.06	15		
Toluene	108-88-3	3	0.000408	lb/MMBtu	0.01	0.05	15		
Ethylbenzene	100-41-4	3	0.0000397	lb/MMBtu	0.00	0.01	15		
Xylene	1330-20-7	3	0.000184	lb/MMBtu	0.01	0.02	15		
n-Hexane	110-54-3	3	0.00111	lb/MMBtu	0.03	0.15	15		
Acetaldehyde	75-07-0	3	0.00836	lb/MMBtu	0.26	1.12	15		
Acrolein	107-02-8	3	0.00514	lb/MMBtu	0.16	0.69	15		
PM2.5	n/a	2	0.0000771	lb/MMBtu	0.00	0.01	15		
PM-CON	n/a	2	0.00991	lb/MMBtu	0.30	1.33	15		
CO2	124389	4	116.98	lb/MMBtu	3,582.51	15,691.40	15		
CH4	74828	5	0.0022	lb/MMBtu	0.07	0.30	15		
N2O	10024972	5	0.00022	lb/MMBtu	0.01	0.03	15		

Total Criteria :	59.49	tons/yr
Total HAPS:	9.19	tons/yr

Notes:

1. TVOP Limits/RACT Limits. PTE based on most stringent

2. From US EPA's AP-42 Table 3.2-2

3. From US EPA's AP-42 Table 3.2-2.

4. From 40 CFR 98 Subpart C Table C-1

1 kg = 2.20462 lb

5. From 40 CFR 98 Subpart C Table C-2

1 kg = 2.20462 lb

Eastern Gas Transmission and Storage, Inc. Facility ID# 55-0629203-67

Source ID - P137

Turbine 1 - Solar Centaur 50-6200LS

Date Installed:	2012	Fuel:	Natual Gas	Т	
SCC:	20300202	*Note: Fuel average heating value of 1000Btu/cf			

Annual fuel usage	505,364.40 MCF
Annual SOLONOX hours	8,760.00 Hours
Annual operating days	365 Days
Rated Input	57.69 MMBtu/hr

_					Potential	Emissions		Permit Limits	Permit Limits	Permit Limits
Pollutant	CAS	REF	Emission Factor	Units	lb/hr	tons/yr	Calc Method	lb/MMBtu ^a	lb/MMBtu ^b	tons/yr ^c
NOx	n/a	1						0.0541	0.1515	13.86
CO	n/a	1						0.011	0.044	2.84
VOC	n/a	1						0.0057	0.0113	1.44
PM 10	n/a	1						0.0066	0.0066	1.67
SO2	n/a	1						0.0056	0.0056	1.42
Formaldehyde	50-00-0	5	0.00071	lb/MMBtu	0.041	0.18	15			
Benzene	71-43-2	5	1.20E-05	lb/MMBtu	0.001	0.00	15			
Toluene	108-88-3	5	1.30E-04	lb/MMBtu	0.007	0.03	15			
Ethylbenzene	100-41-4	5	3.20E-05	lb/MMBtu	0.002	0.01	15			
Xylene	1330-20-7	5	6.40E-05	lb/MMBtu	0.004	0.02	15			
n-Hexane	110-54-3	6			1.36E-03	0.01	15			
Acetaldehyde	75-07-0	5	4.00E-05	lb/MMBtu	0.002	0.01	15			
Acrolein	107-02-8	5	6.40E-06	lb/MMBtu	0.000	0.00	15			
PM2.5	n/a	4	0.0066	lb/MMBtu	0.38	1.67	15			
PM-CON	n/a	4	0.0047	lb/MMBtu	0.27	1.19	15			
CO2	124389	7	116.98	lb/MMBtu	6,748.58	29,558.76	15			
CH4	74828	8	0.0022	lb/MMBtu	0.13	0.56	15			
N2O	10024972	8	0.00022	lb/MMBtu	0.01	0.06	15			

Notes: 1. TVOP Limits

Total Criteria :	0.00	tons/yr
Total HAPS:	0.26	tons/yr

a. SoloNox Mode, b. non- SoloNox Mode c. total emissions as rolling average

4. From US EPAs AP-42 Table 3.1-2a

5. From US EPAs AP-42 Table 3.1-3

6. From GRI HAPCalc 3.0. Catalyst removal efficiency 93%

7. From 40 CFR 98 Subpart C Table C-1, 1 kg = 2.20462 lb

8. From 40 CFR 98 Subpart C Table C-2, 1 kg = 2.20462 lb

Eastern Gas Transmission and Storage, Inc. Facility ID# 55-0629203-13

Source ID - 139

Line Heater - 2.7648 mmBtu/hr Bruest Hot Cat Model HC-2800

Date Installed:	2012	Fuel:	Natual Gas	
SCC:	10300603	*Note: Fuel average heating value of 1000B		/cf

Annual fuel usage	24,219.65 MCF
Annual operating hours	8,760.00 Hours
Annual operating days	365 Days
Fuel Rating	2.8 MMBtu/hr

					Actual B	Emissions		Permit	Limits
Pollutant	CAS	REF	Emission Factor	Units	lb/hr	tons/yr	Calc Method	lb/hr	tons/yr
NOx	n/a	1	100	lb/MMcf	0.28	1.21	15		
СО	n/a	1	84	lb/MMcf	0.23	1.02	15		
VOC	n/a	2	5.5	lb/MMcf	0.02	0.07	15		
PM 10	n/a	2	1.9	lb/MMcf	0.01	0.02	15		
SO2	n/a	2	0.6	lb/MMcf	0.00	0.01	15		
Formaldehyde	50-00-0	3	0.000075	lb/MMBtu	0.00	0.00	15		
Benzene	71-43-2	3	0.0000021	lb/MMBtu	0.00	0.00	15		
Toluene	108-88-3	3	0.0000034	lb/MMBtu	0.00	0.00	15		
Ethylbenzene	100-41-4	3	0	lb/MMBtu	0.00	0.00	15		
Xylene	1330-20-7	3	0	lb/MMBtu	0.00	0.00	15		
n-Hexane	110-54-3	3	0.0018	lb/MMBtu	0.00	0.02	15		
Acetaldehyde	75-07-0	3	0	lb/MMBtu	0.00	0.00	15		
Acrolein	107-02-8	3	0	lb/MMBtu	0.00	0.00	15		
PM2.5	n/a	2	1.9	lb/MMcf	0.01	0.02	15		
PM-CON	n/a	2	5.7	lb/MMcf	0.02	0.07	15		
NH3	7664417	4	0.49	lb/MMcf	0.00	0.01	15		
CO2	124389	5	116.98	lb/MMBtu	323.43	1,416.61	15		
CH4	74828	6	0.0022	lb/MMBtu	0.01	0.03	15		
N2O	10024972	6	0.00022	lb/MMBtu	0.00	0.00	15		

Total Criteria :	2.33	tons/yr
Total HAPS:	0.02	tons/yr

Notes: 1. From US EPA's AP-42 Table 1.4-1

2. From US EPA's AP-42 Table 1.4-2

3. From US EPA's AP-42 Table 1.4-3

4. FIRE Database

5. From 40 CFR 98 Subpart C Table C-1

1 kg = 2.20462 lb

6. From 40 CFR 98 Subpart C Table C-2

1 kg = 2.20462 lb

Eastern Gas Transmission and Storage, Inc. Facility ID# 55-0629203-13

Source ID - 133 Auxiliary Generator - 550 HP Caterpillar SR-4 G3508TA

Date Installed:	1991	Fuel:	Natual Gas	4L
SCC:	20300201	*Note: Fuel average heating	g value of 1000Btu/c	f

Annual fuel usage	605.00 MCF
Annual operating hours	100.00 Hours
Annual operating days	4.2 Days
Rated horsepower	550 bhp

Max Fuel Rate :	6.05	mmBtu/hr			Actual Er	nissions		Permit	t Limits
Pollutant	CAS	REF	Emission Factor	Units	lb/hr	tons/yr	Calc Method	lb/hr	tons/yr
NOx	n/a	1	4.08	lb/MMBtu	24.68	1.23	15		
CO	n/a	1	3.17	lb/MMBtu	19.18	0.96	15		
VOC	n/a	1	0.118	lb/MMBtu	0.71	0.04	15		
PM 10	n/a	4	0.0095	lb/MMBtu	0.06	0.00	15		
SO2	n/a	1	0.000588	lb/MMBtu	0.00	0.00	15		
Formaldehyde	50-00-0	1	0.0528	lb/MMBtu	0.32	0.02	15		
Benzene	71-43-2	1	0.00044	lb/MMBtu	0.00	0.00	15		
Toluene	108-88-3	1	0.000408	lb/MMBtu	0.00	0.00	15		
Ethylbenzene	100-41-4	1	0.0000397	lb/MMBtu	0.00	0.00	15		
Xylene	1330-20-7	1	0.000184	lb/MMBtu	0.00	0.00	15		
n-Hexane	110-54-3	1	0.00111	lb/MMBtu	0.01	0.00	15		
Acetaldehyde	75-07-0	1	0.00836	lb/MMBtu	0.05	0.00	15		
Acrolein	107-02-8	1	0.00514	lb/MMBtu	0.03	0.00	15		
PM2.5	n/a	4	0.0095	lb/MMBtu	0.06	0.00	15		
PM-CON	n/a	4	0.00991	lb/MMBtu	0.06	0.00	15		
CO2	124-38-9	2	116.98	lb/MMBtu	707.73	35.39	15		
CH4	74-82-8	3	0.0022	lb/MMBtu	0.01	0.00	15		
N2O	1002-497-2	3	0.00022	lb/MMBtu	0.00	0.00	15		

Total Criteria :	2.23	tons/yr
Total HAPS:	0.02	tons/yr

Notes: 1. From US EPA's AP-42 Table 3.2-2 2. From 40 CFR 98 Subpart C Table C-1 1 kg = 2.20462 lb 3. From 40 CFR 98 Subpart C Table C-2 1 kg = 2.20462 lb 4. From US EPA's AP-42 Table 3.2-3

Eastern Gas Transmission and Storage, Inc. Facility ID# 55-0629203-13

Source ID - 034

Boiler #1 - 5.5 mmBtu/hr Ajax WGFD-5500

Date Installed:	1964	Fuel:	Natual Gas	
SCC:	10300603	*Note: Fuel average h	eating value of 1000E	Btu/cf

Annual fuel usage	48,180.00 MCF
Annual operating hours	8,760.00 Hours
Annual operating days	365 Days
Fuel Rating	5.5 MMBtu/hr

					Actual F	Emissions		Permit	Limits
Pollutant	CAS	REF	Emission Factor	Units	lb/hr	tons/yr	Calc Method	lb/hr	tons/yr
NOx	n/a	1	100	lb/MMcf	0.55	2.41	15		
CO	n/a	1	84	lb/MMcf	0.46	2.02	15		
VOC	n/a	2	5.5	lb/MMcf	0.03	0.13	15		
PM 10	n/a	2	1.9	lb/MMcf	0.01	0.05	15		
SO2	n/a	2	0.6	lb/MMcf	0.00	0.01	15		
Formaldehyde	50-00-0	3	0.000075	lb/MMBtu	0.00	0.00	15		
Benzene	71-43-2	3	0.0000021	lb/MMBtu	0.00	0.00	15		
Toluene	108-88-3	3	0.0000034	lb/MMBtu	0.00	0.00	15		
Ethylbenzene	100-41-4	3	0	lb/MMBtu	0.00	0.00	15		
Xylene	1330-20-7	3	0	lb/MMBtu	0.00	0.00	15		
n-Hexane	110-54-3	3	0.0018	lb/MMBtu	0.01	0.04	15		
Acetaldehyde	75-07-0	3	0	lb/MMBtu	0.00	0.00	15		
Acrolein	107-02-8	3	0	lb/MMBtu	0.00	0.00	15		
PM2.5	n/a	2	1.9	lb/MMcf	0.01	0.05	15		
PM-CON	n/a	2	5.7	lb/MMcf	0.03	0.14	15		
NH3	7664417	4	0.49	lb/MMcf	0.00	0.01	15		
CO2	124389	5	116.98	lb/MMBtu	643.39	2,818.05	15		
CH4	74828	6	0.0022	lb/MMBtu	0.01	0.05	15		
N2O	10024972	6	0.00022	lb/MMBtu	0.00	0.01	15		

Total Criteria :	4.63	tons/yr
Total HAPS:	0.05	tons/yr

Notes:

1. From US EPA's AP-42 Table 1.4-1

2. From US EPA's AP-42 Table 1.4-2

3. From US EPA's AP-42 Table 1.4-3

- 4. FIRE Database
- 5. From 40 CFR 98 Subpart C Table C-1
 - 1 kg = 2.20462 lb

6. From 40 CFR 98 Subpart C Table C-2 1 kg = 2.20462 lb

Eastern Gas Transmission and Storage, Inc. Facility ID# 55-0629203-13

Source ID - 035 Hot Water Heater - 0.38 MMBtu/hr

Date Installed:	2015	Fuel:	Natual Gas	
SCC:		*Note: Fuel average h	eating value of 1000I	Btu/cf

Annual fuel usage	3,328.80 MCF
Annual operating hours	8,760.00 Hours
Annual operating days	365 Days
Fuel Rating	0.38 MMBtu/hr

					Actual E	missions		Permit	Limits
Pollutant	CAS	REF	Emission Factor	Units	lb/hr	tons/yr	Calc Method	lb/hr	tons/yr
NOx	n/a	1	100	lb/MMcf	0.04	0.17	15		
CO	n/a	1	84	lb/MMcf	0.03	0.14	15		
VOC	n/a	2	5.5	lb/MMcf	0.00	0.01	15		
PM 10	n/a	2	1.9	lb/MMcf	0.00	0.00	15		
SO2	n/a	2	0.6	lb/MMcf	0.00	0.00	15		
Formaldehyde	50-00-0	3	0.000075	lb/MMBtu	0.00	0.00	15		
Benzene	71-43-2	3	0.0000021	lb/MMBtu	0.00	0.00	15		
Toluene	108-88-3	3	0.0000034	lb/MMBtu	0.00	0.00	15		
Ethylbenzene	100-41-4	3	0	lb/MMBtu	0.00	0.00	15		
Xylene	1330-20-7	3	0	lb/MMBtu	0.00	0.00	15		
n-Hexane	110-54-3	3	0.0018	lb/MMBtu	0.00	0.00	15		
Acetaldehyde	75-07-0	3	0	lb/MMBtu	0.00	0.00	15		
Acrolein	107-02-8	3	0	lb/MMBtu	0.00	0.00	15		
PM2.5	n/a	2	1.9	lb/MMcf	0.00	0.00	15		
PM-CON	n/a	2	5.7	lb/MMcf	0.00	0.01	15		
NH3	7664417	4	0.49	lb/MMcf	0.00	0.00	15		
CO2	124389	5	116.98	lb/MMBtu	44.45	194.70	15		
CH4	74828	6	0.0022	lb/MMBtu	0.00	0.00	15		
N2O	10024972	6	0.00022	lb/MMBtu	0.00	0.00	15		

Total Criteria :	0.32	tons/yr
Total HAPS:	0.00	tons/yr

Notes:

1. From US EPA's AP-42 Table 1.4-1

2. From US EPA's AP-42 Table 1.4-2

3. From US EPA's AP-42 Table 1.4-3

- 4. FIRE Database
- 5. From 40 CFR 98 Subpart C Table C-1
 - 1 kg = 2.20462 lb

6. From 40 CFR 98 Subpart C Table C-2 1 kg = 2.20462 lb

Eastern Gas Transmission and Stoarge, Inc. - Punxsutawney Compressor Station Fugitive Emisisons PTE Component Beakdown

Major Fugitive Emissions Source	Equipment Category	Facility-Wide Inventory	Componenet Type	Total Component Count	Annual Hours	EF, kg THC/hr/comp. ²	EF, Ib THC/hr/comp.	VOC ⁴ Ibs/hr/comp.	VOC lbs/hr total	VOC TPY	Major FUG Source Total	Table W-1B Subp for Major Onshor Petroleum and	Table W-1B Subpart W Part 98 - Default Average Component Cour for Major Onshore Natural Gas Production Equipment and Onsho Petroleum and Natural Gas Gathering and Boosting Equipment		nt Counts Onshore pment			
Compressor Station	1				-				-	-		Major Equipment	Valve	Connectors	Open-Ended Lines	PRV's		
			Valves ³	3	8,760	1.969E-02	4.341E-02	9.001E-04	0.190	0.83		Wellheads	8	38	0.5	0		
	Senarators	3	Connectors	18	8,760	2.732E-04	6.023E-04	1.249E-05	0.000	0.00		Separators	1	6	0	0		
	ooparatoro	Ū	Open-ended lines	0	8,760	8.355E-02	1.842E-01	3.819E-03	0.000	0.00		Meters/Piping	12	45	0	0		
			Pressure relief valves	0	8,760	2.795E-01	6.162E-01	1.278E-02	0.000	0.00		Compressors	12	57	0	0		
			Valves ³	24	8,760	1.969E-02	4.341E-02	9.001E-04	0.022	0.09		In-Line Heaters	14	65	2	1		
	Motors/Pining	2	Connectors	90	8,760	2.732E-04	6.023E-04	1.249E-05	0.001	0.00	1 29	Dehydrators	24	90	2	2		
	Meters/Piping	2	Open-ended lines	0	8,760	8.355E-02	1.842E-01	3.819E-03	0.000	0.00	1.50							
			Pressure relief valves	0	8,760	2.795E-01	6.162E-01	1.278E-02	0.000	0.00								
			Valves ³	42	8,760	1.969E-02	4.341E-02	9.001E-04	0.038	0.17								
	In Line Lleaters	2	Connectors	195	8,760	2.732E-04	6.023E-04	1.249E-05	0.002	0.01								
	In-Line Heaters	3	Open-ended lines	6	8,760	8.355E-02	1.842E-01	3.819E-03	0.023	0.10								
			Pressure relief valves	3	8,760	2.795E-01	6.162E-01	1.278E-02	0.038	0.17								
Engine 1						•			•			1						
			Valves ³	12	8,760	1.969E-02	4.341E-02	9.001E-04	0.011	0.05								
			Connectors	57	8,760	2.732E-04	6.023E-04	1.249E-05	0.001	0.00								
	Compressor	1	Open-ended lines	0	8,760	8.355E-02	1.842E-01	3.819E-03	0.000	0.00	0.18							
			Pressure relief valves	0	8,760	2.795E-01	6.162E-01	1.278E-02	0.000	0 0.00 0 0.13								
			Seal - Centrifugal	1	8,760	6.616E-01	1.459E+00	3.024E-02	0.030									
Engine 2						•			•			1						
			Valves ³	12	8.760	1.969E-02	4.341E-02	9.001E-04	0.011	0.05								
			Connectors	57	8,760	2.732E-04	6.023E-04	1.249E-05	0.001	0.00								
	Compressor	1	Open-ended lines	0	8,760	8.355E-02	1.842E-01	3.819E-03	0.000	0.00	0.18							
			Pressure relief valves	0	8,760	2.795E-01	6.162E-01	1.278E-02	0.000	0.00								
			Seal - Centrifugal	1	8,760	6.616E-01	1.459E+00	3.024E-02	0.030	0.13								
Engine 3									•									
			Valves ³	12	8,760	1.969E-02	4.341E-02	9.001E-04	0.011	0.05								
			Connectors	57	8,760	2.732E-04	6.023E-04	1.249E-05	0.001	0.00								
	Compressor	1	Open-ended lines	0	8,760	8.355E-02	1.842E-01	3.819E-03	0.000	0.00	0.18							
			Pressure relief valves	0	8,760	2.795E-01	6.162E-01	1.278E-02	0.000	0.00								
			Seal - Centrifugal	1	8,761	6.616E-01	1.459E+00	3.024E-02	0.030	0.13								
Turbine					•		•	•			•							
			Valves ³	12	8,760	1.969E-02	4.341E-02	9.001E-04	0.011	0.05								
	Comment	A	Connectors	57	8,760	2.732E-04	6.023E-04	1.249E-05	0.001	0.00	0.05							
	Compressor	Compressor	Compressor	1	Open-ended lines	0	8,760	8.355E-02	1.842E-01	3.819E-03	0.000	0.00	0.05					
			Pressure relief valves	0	8,760	2.795E-01	6.162E-01	1.278E-02	0.000	0.00	<u> </u>							

Total PTE VOC (TPY) 1.98

¹ Components not associated with a compressor/engine or compressor/turbine

² EF from Table 6-18 *Natural Gas Transmission and Storage Average Emission Factors* - 2009 GHG Compendium

³Assumed all valves are control valves to get most conservative value

⁴ Based on most conservative site specific gas sample 2.07% of the THC is VOC, see gas analysis below.

Gas Analysis

Constituent	MW	Compsition	Density of Constituent Gases	Contributio n to Overall Sample Density by Species	Composition	
	(g/g mole)	(mole %)	(g/l)	(g/l)	(weight %)	
Methane	16	96.679%	0.675	0.653	1.15%	
Ethane	30	2.283%	1.266	0.029	0.05%	
Propane	44	0.222%	1.857	0.004	0.01%	
Butane(s)	58	0.079%	2.448	0.002	0.00%	
Pentane(s)	72	0.222%	3.039	0.007	0.01%	
Hexanes+	86	0.045%	3.630	0.002	0.00%	0.6963 Total Hydrocarbons (g/l)
Nitrogen	28	0.510%	1.182	0.006	0.01%	0.014 Total VOC (g/l)
CO2	44	0.142%	1.857	0.003	0.00%	2.0735% VOC percent by weight
TOTAL		100.182%		0.705		

1. From gas analysis #103626 Ardell 2 to TL-477/478 9/11/2018

COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION

GENERAL INFORMATION FORM – AUTHORIZATION APPLICATION

Before completing this General Information Form (GIF), read the step-by-step instructions provided in this application package. This form is used by the Department of Environmental Protection (DEP) to inform our programs regarding what other DEP permits or authorizations may be needed for the proposed project or activity. This version of the General Information Form (GIF) must be completed and returned with any program-specific application being submitted to the DEP.

Related ID#s (If F	Known)		DEP	USE ON	LY	
Client ID# 81074	APS ID#		Date Recei	ved & Gene	ral Notes	
Site ID#	Auth ID#					
Facility ID# 283701						
				_	_	
		IATION				
DEP Client ID# Clie	ent Type / Code		Dun & Brads	street ID#		
81074						
Legal Organization Name or Registered	ed Fictitious Name	Employe	r ID# (EIN)	Is the El	N a SSI	N?
Eastern Gas Transit and Storage Inc		55-06292	03	Yes	\boxtimes	NO
State of Incorporation or Registration	of Fictious Name	Corporation		Partnershi	p 🗌 Li	LP 🗌 LP
		Sole Proprieto	orship 🗌 /	Associatio	n/Organ	ization
		Estate/Trust	Other			
Individual Last Name	First Name	MI	Suffi	X		
Additional Individual Last Name	First Name	MI	Suffi	~		
	i list Name		Sum	^		
Mailing Address Line 1	Ма	iling Address	Line 2			
6603 West Broad Street		C				
Address Last Line – City	State	ZIP+4	C	ountry		
Richmond	Virginia	23230	U	SA		
Client Contact Last Name	First Name		MI	S	uffix	
Boutillier	Glenn		F 4			
Client Contact Little	Pn 80	0ne 4 356 1364	Ext	U U	ell Pho	ne
	00	4-330-1304	FAX			
Glenn.Boutillier@bheats.com			1 44			
DED Site ID# Site Name						
DEP Sile ID# Sile Name Pupysutawney Corr	nressor Station					
EPA ID# Es	timated Number of Em	plovees to be	Present at	Site		
Description of Site						
Natural Gas Compressor Station						
Tax Parcel ID(s):						
County Name(s) Munici	ipality(ies)		City	Boro	Twp	State
Jefferson Perry				<u> </u>		
				<u> </u>		
				<u> </u>		
Site Location Line 1	Sito	Location Line	<u> </u>			
88 Laska Rd	Site		~ _			
Site Location Last Line – City	State	e ZIP+4				
Punxsutawney	PA	15767				
Detailed Written Directions to Site						

From PA-28 N, after 13.5 miles take exit towards Kittanning/Indiana . Continue onto PA-28 N for 4 miles and turn right onto PA-85 E. Stay on PA-85 E for 19 miles then turn left onto PA-210 N. Stay on PA-210 N for 12 miles then turn left ontoer Yoder Rd. Turn right onto Kachmar Rd, and after 0.3 miles turn into compressor station.

Site C	contact Last Name	First N	lame		МІ	Si	ıffix		
Boutill	ier	Glenn	lame			0.			
Site C	contact Title	Cloim	Site C	ontact Firm					
Enviro	omental Specialist III								
Mailin	g Address Line 1		Mailin	a Address Li	ine 2				
6603	West Broad Street								
Mailin	g Address Last Line – City		State	ZIP+4					
Richm	iond		VA	23230					
Phone	e Ext F	4X	Email	Address					
804-3	56-1364		Glenn.	Boutillier@bh	egts.com				
NAICS	S Codes (Two- & Three-Digit Codes –	List All That A	pply)	6	-Digit Code	(Optional)			
486									
Client	to Site Relationship								
Owne	r/Operator								
		FACILIT	Y INFORM	ATION					
Modif	ication of Existing Facility					Yes	No		
1.	Will this project modify an existi	ng facility, s	system, or a	ctivity?		\boxtimes			
2.	Will this project involve an addit	ion to an ex	isting facilit	y, system, o	r activity?	\boxtimes			
	If "Yes", check all relevant facility t	pes and pro	vide DEP fa	cility identifica	ation number	rs below.			
			<u></u>	-					
	Air Emission Plant	DEP Fac I	D#	Facility Type	ale Mining Onor	DE	P Fac ID#		
	All Ellission Flant Beneficial Use (water)	283701	H		ation				
H	Blasting Operation		H	Land Recycling	Cleanup I ocati	ion			
H	Captive Hazardous Waste Operation		H	Land Necycling Cleanup Eccation					
				Recycling Proje	ct Location				
	Coal Ash Beneficial Use Operation		[]	Municipal Wast	e Operation				
	Coal Mining Operation		[]	Oil & Gas Encro	achment Locat	ion			
Ц	Coal Pillar Location	·	<u> </u>	Oil & Gas Locat	ion	····			
H	Commercial Hazardous waste Operation		H	Oll & Gas Wate					
H	Dam Location		H	Public Water St	ippiy System				
H	Deep Mine Safety Operation -Bituminous		H	Residual Waste	Operation				
H	Deep Mine Safety Operation -Ind Minerals		H	Storage Tank L	ocation				
Н	Encroachment Location (water, wetland)		H	Water Pollution	Control Facility				
	Erosion & Sediment Control Facility			Water Resource	9				
	Explosive Storage Location			Other:					
	Latitude/Longitude	L	Latitude		_	Longitude			
	Point of Origin	Degrees	Minutes	Seconds	Degrees	Minutes	Seconds		
		40	54	30	-79	1	9		
Horiz	ontal Accuracy Measure	Feet		0r	Me Me	eters			
Horiz	ontal Reference Datum Code		th American	Datum of 192	27				
			th American	Datum of 198	33				
Horiz	antal Callection Mathed Code		la Geodetic	System of 19	84				
Bofor	ontal Collection Method Code								
Altitu		Foot		or	Ma	toro			
Altitu	de Detum Name		National Co	10	· IVIE	1020			
Aititu			North Amor	ican Vortical	a Datum of 10	1929 88 (NIV/LOO)			
Δ +i+ ,	de (Vertical) Location Datum Colle						1		
Geom	etric Type Code								
Data (Collection Date								
Sourc	e Man Scale Number		Inch(es)	=		Feet			
00010			Centimete	r(s) =		Motor			

PROJECT INFORMATION

Proj	ect Name									
RAC	T Compliance	-								
Insta	ect Description	n and alternativ		uirements for	compressor eta	ation				
Proi	ect Consultant	Last Name	e naci ieqi	First Name			мі		Suffix	
Mus	centi			Tom					Cullix	
Proj	ect Consultant	Title		Co	onsulting Firm	1				
Regi	onal Manager			Tri	inity Consultan	ts				
Mail	ing Address L	ine 1		Ma	ailing Address	S Line 2	2			
4500	Brooktree Rd.	0:4		SL	lite 310		710 .			
Max	ford	– City		50			1500	∔ ∩		
Pho	ne	Ext	FAX	<u> </u>	` Email Address	\$	15050	0		
724-	935-2611			t	muscenti@trin	itycons	ultants	.com		
Time	e Schedules	Project	Milestone (Optional)	¥					
					57		_			
1.	Is the projec	t located in e	or within a 0	.5-mile radiu	s 🖂	Yes		No		
	defined by D	FD2	Justice co	ommunity a	5					
	denned by D									
	To detern	nine if the proj	ect is located i	in or within a 0.	5-mile radius of	an envi	ronmen	tal justice co	mmunity	, please use
	the online	Environmenta	al Justice Area	is viewer.						
2.	Have you in	formed the	surroundin	g communit	y 🗆	Yes	\boxtimes	No		
	prior to s	ubmitting t	he applica	ition to th	e					
	Department	e								
	Method of n	otification:								
3		ddressed c	ommunity c	oncorns tha	• t	Yes		No		N/A
υ.	were identifi	ed?	oninianity c			100		110		
	lf no, plea	se briefly deso	cribe the comn	nunity concerns	s that have been	express	sed and	not address	ed.	
4.	ls your proje	ct funded by	y state or fe	deral grants?	? □	Yes		No		
	Note: If "Yes	", specity what	t aspect of the	project is relate	ed to the grant a	nd prov	ide the g	grant source	, contact	person
	and gi		uale.							
	Aspect	of Project Rel	ated to Grant							
	Grant	Source:								
	Grant	Contact Persor	n:							
	Grant	Expiration Date	e:							
5.	ls this ap	olication fo	r an auth	orization o	n 🗆	Yes	\boxtimes	No		
	Appendix A	of the La	and Use P	olicy? (Fo	r					
	referenced I	ist, see App	endix A of	the Land Us	e					
	Policy attach	te Outputier 5	structions)	n io not out	to the locall-	Dalia				
		To Question 5,	the application	on is subject to	this policy and t	<u>+ POIICY</u> he Δnnl	icant ch	ould answer	the addi	tional
	questi	ons in the Lan	d Use Informa	ation section.	uno policy and t	ne Ahhi	icant SII		ane audi	uonai

LAND USE INFORMATION - NOT APPLICABLE

<u>Note</u>: Applicants should submit copies of local land use approvals or other evidence of compliance with local comprehensive plans and zoning ordinances.

1.	Is there an adopted county or multi-county comprehensive plan?		Yes		No
2.	Is there a county stormwater management plan?		Yes		No
3.	Is there an adopted municipal or multi-municipal comprehensive		Yes		No
	plan?				
4.	Is there an adopted county-wide zoning ordinance, municipal zoning		Yes		No
	ordinance or joint municipal zoning ordinance?				
	Note: If the Applicant answers "No" to either Questions 1, 3 or 4, the provisions	of the PA M	IPC are no	ot appli	cable and the
	Applicant does not need to respond to questions 5 and 6 below.				
	If the Applicant answers "Yes" to questions 1, 3 and 4, the Applicant shou	Id respond	to questio	ns 5 ar	nd 6 below.
5.	Does the proposed project meet the provisions of the zoning		Yes		No
	ordinance or does the proposed project have zoning approval? If				
	zoning approval has been received, attach documentation.				
6.	Have you attached Municipal and County Land Use Letters for the		Yes		No
	project?				

COORDINATION INFORMATION

<u>Note</u>: The PA Historical and Museum Commission must be notified of proposed projects in accordance with DEP Technical Guidance Document 012-0700-001 utilizing the <u>Project Review Form</u>.

If the activity will be a mining project (i.e., mining of coal or industrial minerals, coal refuse disposal and/or the operation of a coal or industrial minerals preparation/processing facility), respond to questions 1.0 through 2.5 below.

If the activity will not be a mining project, skip questions 1.0 through 2.5 and begin with question 3.0.

1.0	Is this a coal mining project? If "Yes", respond to 1.1-1.6. If "No", skip to Question 2.0.	Yes	\boxtimes	No
1.1	Will this coal mining project involve coal preparation/ processing activities in which the total amount of coal prepared/processed will be equal to or greater than 200 tons/day?	Yes		No
1.2	Will this coal mining project involve coal preparation/ processing activities in which the total amount of coal prepared/processed will be greater than 50,000 tons/year?	Yes		No
1.3	Will this coal mining project involve coal preparation/ processing activities in which thermal coal dryers or pneumatic coal cleaners will be used?	Yes		No
1.4	For this coal mining project, will sewage treatment facilities be constructed and treated waste water discharged to surface waters?	Yes		No
1.5	Will this coal mining project involve the construction of a permanent impoundment meeting one or more of the following criteria: (1) a contributory drainage area exceeding 100 acres; (2) a depth of water measured by the upstream toe of the dam at maximum storage elevation exceeding 15 feet; (3) an impounding capacity at maximum storage elevation exceeding 50 acre-feet?	Yes		No
1.6	Will this coal mining project involve underground coal mining to be conducted within 500 feet of an oil or gas well?	Yes		No
2.0	Is this a non-coal (industrial minerals) mining project? If "Yes", respond to 2.1-2.6. If "No", skip to Question 3.0.	Yes	\boxtimes	No
2.1	Will this non-coal (industrial minerals) mining project involve the crushing and screening of non-coal minerals other than sand and gravel?	Yes		No
2.2	Will this non-coal (industrial minerals) mining project involve the crushing and/or screening of sand and gravel with the exception of wet sand and gravel operations (screening only) and dry sand and gravel operations with a capacity of less than 150 tons/hour of unconsolidated materials?	Yes		No

2.3	Will this non-coal (industrial minerals) mining project involve the construction, operation and/or modification of a portable non- metallic (i.e., non-coal) minerals processing plant under the authority of the General Permit for Portable Non-metallic Mineral Processing Plants (i.e., BAQ-PGPA/GP-3)?	Yes	No
2.4	treatment facilities be constructed and treated waste water discharged to surface waters?	res	
2.5	Will this non-coal (industrial minerals) mining project involve the construction of a permanent impoundment meeting one or more of the following criteria: (1) a contributory drainage area exceeding 100 acres; (2) a depth of water measured by the upstream toe of the dam at maximum storage elevation exceeding 15 feet; (3) an impounding capacity at maximum storage elevation exceeding 50 acre-feet?	Yes	Νο
3.0	Will your project, activity, or authorization have anything to do with a well related to oil or gas production, have construction within 200 feet of, affect an oil or gas well, involve the waste from such a well, or string power lines above an oil or gas well? If "Yes", respond to 3.1-3.3. If "No", skip to Question 4.0.	Yes	No
3.1	Does the oil- or gas-related project involve any of the following: placement of fill, excavation within or placement of a structure, located in, along, across or projecting into a watercourse, floodway or body of water (including wetlands)?	Yes	No
3.2	Will the oil- or gas-related project involve discharge of industrial wastewater or stormwater to a dry swale, surface water, ground water or an existing sanitary sewer system or storm water system? If "Yes", discuss in <i>Project Description</i> .	Yes	No
3.3	Will the oil- or gas-related project involve the construction and operation of industrial waste treatment facilities?	Yes	No
4.0	Will the project involve a construction activity that results in earthdisturbance?If "Yes", specify the total disturbed acreage.4.0.1Total Disturbed Acreage	Yes	No
	4.0.2 Will the project discharge or drain to a special protection water (EV or HQ) or an EV wetland?	Yes	No
	4.0.3 Will the project involve a construction activity that results in earth disturbance in the area of the earth disturbance that are contaminated at levels exceeding residential or non-residential medium-specific concentrations (MSCs) in 25 Pa. Code Chapter 250 at residential or non- residential construction sites, respectively?	Yes	No
5.0	Does the project involve any of the following: water obstruction and/or encroachment, wetland impacts, or floodplain project by the Commonwealth/political subdivision or public utility? If "Yes", respond to 5.1-5.7. If "No", skip to Question 6.0.	Yes	No
5.1	Water Obstruction and Encroachment Projects – Does the project involve any of the following: placement of fill, excavation within or placement of a structure, located in, along, across or projecting into a watercourse, floodway or body of water?	Yes	No
5.2	Wetland Impacts – Does the project involve any of the following: placement of fill, excavation within or placement of a structure, located in, along, across or projecting into a wetland?	Yes	No
5.3	Floodplain Projects by the Commonwealth, a Political Subdivision of the Commonwealth or a Public Utility – Does the project involve any of the following: placement of fill, excavation within or placement of a structure, located in, along, across or projecting into a floodplain?	Yes	No
5.4	Is your project an interstate transmission natural gas pipeline?	Yes	No

5.5	Does your project consist of linear construction activities which result in earth disturbance in two or more DEP regions AND three or more counties?		Yes		No
5.6	Does your project utilize Floodplain Restoration as a best management practice for Post Construction Stormwater Management?		Yes		No
5.7	Does your project utilize Class V Gravity / Injection Wells as a best management practice for Post Construction Stormwater Management?		Yes		No
6.0	Will the project involve discharge of construction related stormwater to a dry swale, surface water, ground water or separate storm water system?		Yes	\boxtimes	No
6.1	Will the project involve discharge of industrial waste stormwater or wastewater from an industrial activity or sewage to a dry swale, surface water, ground water or an existing sanitary sewer system or separate storm water system?		Yes		No
7.0	Will the project involve the construction and operation of industrial waste treatment facilities?		Yes	\boxtimes	No
8.0	 Will the project involve construction of sewage treatment facilities, sanitary sewers, or sewage pumping stations? If "Yes", indicate estimated proposed flow (gal/day). Also, discuss the sanitary sewer pipe sizes and the number of pumping stations/treatment facilities/name of downstream sewage facilities in the <i>Project Description</i>, where applicable. 8.0.1 Estimated Proposed Flow (gal/day) 		Yes		No
9.0	Will the project involve the subdivision of land, or the generation of 800 gpd or more of sewage on an existing parcel of land or the generation of an additional 400 gpd of sewage on an already- developed parcel, or the generation of 800 gpd or more of industrial wastewater that would be discharged to an existing sanitary sewer system?		Yes		No
	9.0.1 Was Act 537 sewage facilities planning submitted and approved by DEP? If "Yes" attach the approval letter. Approval required prior to 105/NPDES approval.		Yes		No
10.0	Is this project for the beneficial use of biosolids for land application within Pennsylvania? If "Yes" indicate how much (i.e. gallons or dry tons per year). 10.0.1 Gallons Per Year (residential septage) 10.0.2 Dry Tons Per Year (biosolids)		Yes		No
11.0	Does the project involve construction, modification or removal of a dam? If "Yes", identify the dam. 11.0.1 Dam Name		Yes		No
12.0	Will the project interfere with the flow from, or otherwise impact, adam? If "Yes", identify the dam.12.0.1Dam Name		Yes	\boxtimes	No
13.0	Will the project involve operations (excluding during the construction period) that produce air emissions (i.e., NOX, VOC, etc.)?	\boxtimes	Yes		No
	13.0.1 If "Yes", is the operation subject to the agricultural exemption in 35 P.S. § 4004.1?		Yes		No
	 13.0.2 If the answer to 13.0.1 is "No", identify each type of emission followed by the estimated amount of that emission. Enter all types & amounts of See Emission Calcs emissions; separate each set with semicolons. 				

14.0	Does the project include the construction or modification of a drinking water supply to serve 15 or more connections or 25 or more people, at least 60 days out of the year? If "Yes", check all proposed sub-facilities. 14.0.1 Number of Persons Served		Yes		No
	14.0.2 Number of Employee/Guests				
	14.0.3 Number of Connections				
	14.0.4 Sub-Fac: Distribution System		Yes		No
	14.0.5 Sub-Fac: Water Treatment Plant		Yes		No
	14.0.6 Sub-Fac: Source		Yes		No
	14.0.7 Sub-Fac: Pump Station		Yes		No
	14.0.8 Sub Fac: Transmission Main		Yes		No
	14.0.9 Sub-Fac: Storage Facility		Yes		No
15.0	Will your project include infiltration of storm water or waste water		Yes	\boxtimes	No
	to ground water within one-half mile of a public water supply well,				
	spring or infiltration gallery?				
16.0	Is your project to be served by an existing public water supply? If		Yes	X	NO
	"Yes", indicate name of supplier and attach letter from supplier stating				
	that it will serve the project.				
	16.0.1 Supplier's Name		Voc		No
47.0	16.0.2 Letter of Approval from Supplier Is Attached		Vos		No
17.0	Will this project be served by on-lot drinking water weils?		Ves		No
10.0	will this project involve a new of increased uninking water withdrawal from a river stream spring lake well or other water		163		NO
	hod/ies)? If "Ves" reference Safe Drinking Water Program				
	18.0.1 Source Name				
10.0	Will the construction or operation of this project involve treatment		Yes		No
13.0	storage, reuse, or disposal of waste? If "Yes", indicate what type (i.e., hazardous, municipal (including infectious & chemotherapeutic), residual) and the amount to be treated, stored, re-used or disposed.		100		
	19.0.1 Type & Amount				
20.0	Will your project involve the removal of coal, minerals,		Yes	\bowtie	No
	contaminated media, or solid waste as part of any earth disturbance activities?				
21.0	Does your project involve installation of a field constructed		Yes	\boxtimes	No
	underground storage tank? If "Yes", list each Substance & its				
	Capacity. Note: Applicant may need a Storage Tank Site Specific				
	11Stallation Petrinit. 21.0.1 Enter all substances 8				
	canacity of each: senarate				
	each set with semicolons				
22.0	Does your project involve installation of an aboveground storage		Yes	\boxtimes	No
	tank greater than 21,000 gallons capacity at an existing facility? If	_			
	"Yes", list each Substance & its Capacity. Note: Applicant may need a				
	Storage Tank Site Specific Installation Permit.				
	22.0.1 Enter all substances &				
	capacity of each; separate				
	each set with semicolons.			.	
23.0	Does your project involve installation of a tank greater than		Yes	\boxtimes	No
	1,100 gallons which will contain a highly hazardous substance as				
	defined in DEP's Regulated Substances List, 2570-BK-DEP2724? If				
	"Yes", list each Substance & its Capacity. Note: Applicant may need a				
	Storage I ank Site Specific Installation Permit.				
	23.0.1 Enter all substances &				
	each set with semicolons				

24.0	Does your project involve installation of a storage tank at a new	\boxtimes	Yes	No
	facility with a total AST capacity greater than 21,000 gallons? If			
	"Yes", list each Substance & its Capacity. Note: Applicant may need a			
	Storage Tank Site Specific Installation Permit.			
	24.0.1 Enter all substances &			
	capacity of each; separate			
	each set with semicolons.			
			Les alles and alles	

<u>NOTE:</u> If the project includes the installation of a regulated storage tank system, including diesel emergency generator systems, the project may require the use of a Department Certified Tank Handler. For a full list of regulated storage tanks and substances, please go to <u>www.dep.pa.gov</u> search term storage tanks

25.0	Will the intended activity involve the use of a radiation source?	Yes	🖾 No
	CERTIFICATION		

I certify that I have the authority to submit this application on behalf of the applicant named herein and that the information provided in this application is true and correct to the best of my knowledge and information.

For applicants supplying an EIN number: I am applying for a permit or authorization from the Pennsylvania Department of Environmental Protection (DEP). As part of this application, I will provide DEP with an accurate EIN number for the applicant entity. By filing this application with DEP, I hereby authorize DEP to confirm the accuracy of the EIN number provided with the Pennsylvania Department of Revenue. As applicant, I further consent to the Department of Revenue discussing the same with DEP prior to issuance of the Commonwealth permit or authorization.

Type or Print Name	John M. Lamb		
Al 74	1ll	Vice President, Eastern Pipeline Operations	12/13/2022
Signature (Title	Date

APPENDIX C. PLAN APPROVAL FORMS


PROCESSES

Application for Plan Approval to Construct, Modify or Reactivate an Air Contamination Source and/or Install an Air Cleaning Device

This application must be submitted with the General Information Form (GIF).

Before completing this form, read the instructions provided for the form.

Section A - Faci	lity Name, Check	list And Certifi	cation			
Organization Name or Registered Fictitious Nar DEP Client ID# (if known): <u>81074</u>	ne/Facility Name: <u>Ea</u>	stern Gas Transmis	ssion and Storage/Punxsutawney			
Type of Review required and Fees:						
Source which is not subject to NSPS, NESHAPs, MACT, NSR and PSD:						
	Applicant's Che	cklist				
Check the following list to m	ake sure that all the	required docume	ents are included.			
🖂 General Information Form (GIF)						
🛛 Processes Plan Approval Applicat	ion					
Compliance Review Form or pro facilities submitting on a periodic bas	vide reference of m	ost recently subm	itted compliance review form for			
Copy and Proof of County and Mu	nicipal Notification	5				
🖂 Permit Fees						
Addendum A: Source Applicable R	equirements (only ap	plicable to existing	Title V facility)			
Certification of Truth, Accu	racy and Comple	teness by a Re	esponsible Official			
I, John M. Lamb	, certify under pen	alty of law in 18 Pa.	. C. S. A. §4904, and			
35 P.S. §4009(b) (2) that based on information	and belief formed af	er reasonable inqu	iry, the statements and information			
in this application are true, accurate and comple	te.					
N 111	_	10/12/2022				
(Signature):	Da	te: 12/13/2022	Eastern Dinalina Onarationa			
Name (Print): <u>John M. Lamp</u>	l it	e: <u>vice President, i</u>				
	OFFICIAL USE O	NLY				
Application No.	Unit ID	Site	e ID			
DEP Client ID #:	APS. ID	AU	TH. ID			
Date Received	Date Assigned	Re	viewed By			
Date of 1 st Technical Deficiency Comments:	Da	te of 2 nd Technical	Deficiency			

GASTERNA GASTEANGARSSICH AND STORAGE

Eastern Gas Transmission and Storage, Inc. 6603 W Broad St. Richmond, VA 23230 PAGE: 1 of 1

DATE: November 29, 2022 Document Number: 20000175341004 CHECK NUMBER: 339885 AMOUNT PAID: \$2,500.00

DODD2 6413 CKS SB 22333 - DDDD339845 NNNNNNNN 3335300002203 X69744 C PENNSYLVANIA COMMONWEALTH OF CLEAN AIR FUND ENVIRONMENTAL PROTECTION DEPT NORTHWEST REGIONAL OFFICE 230 CHESTNUT ST MEADVILLE PA 16335-3481

Vendor Number: 300014805

Invoice Date Invoice Number	Purchase Order	Description	Gross Amount	Discount	Net Amount
11/28/22 EF0000150049		Plan Approval Fee for Punxsutawney Compressor	\$2,500.00	\$0.00	\$2,500.00
		TOTALS	\$2,500.00	\$0.00	\$2,500.00

CAS TRANSMISSION.	Eastern Gas Transmission and Storage, Inc. 6603 W Broad St. Richmond, VA 23230	CHECK NUMBER 33988	5 <u>50-937</u> 213
		November 29, 2022	
		*** VOID AFTER 90 DAYS ***	
PAY TO THE	PENNSYLVANIA COMMONWEALTH OF CLEAN AIR FUND	Vendor Number: 300014805	
ORDER OF:	ENVIRONMENTAL PROTECTION DEPT	Document No: 2000017534100	CHECK AMOUNT
	230 CHESTNUT ST MEADVILLE, PA 16335-3481		\$2,500.00
	EXACTLY *******2,500 DOL	LARS AND 00 CENTS	Security features Included. Details on back.
PMORGAN CHASE	BANK, N.A.		
Eastern Gas T Storage, Inc	ransmission and		ado C. Mulh
			orized Signature

#339885# 40213093794

601839988#

	\$	Section B - Pro	ocesses Informat	ion			
1. Source Info	ormation						
Source Descriptio	n (give type, use, raw	/ materials, produc	t, etc). Attach additio	nal sheets as	s necessary.		
Manufacturer Model No. Number of Sources Dresser Rapd TV_10 1							
Source Designatio	วท	Maximu 4 200 b	um Capacity	Rate	d Capacity		
Type of Material F	Processed	.,	·F	I			
Maximum Opera	ting Schedule						
Hours/Day 24	Days/Wo	eek	Days/Year 365		Hours/Year 8760		
Operational restric	ctions existing or requ	iested, if any (e.g.,	, bottlenecks or volunt	ary restrictio	ns to limit PTE)		
Capacity (specify	y units)		1				
Per Hour	Per Day		Per Week	L.	Per Year		
29.4 MIMBlu/nr		IVIBIU/d	4939.2 MINBlu/wee	K	257,544 MMBlu/yr		
Hours/Day	Days/We	eek	Days/Year		Hours/Year		
24	7		365		8760		
Seasonal variation	ns (Months) From		to				
0 Fuel							
Z. Fuel	Quantity			% Ash			
Туре	Hourly	Annually	Sulfur	(Weight)	BTU Content		
Oil Number	GPH @ 60°F	X 10 ³ Gal	% by wt		Btu/Gal. & Lbs./Gal. @ 60 °F		
Oil Number	GPH @ 60°F	X 10 ³ Gal	% by wt		Btu/Gal. & Lbs./Gal. @ 60 °F		
Natural Gas	2.94E-02 SCFH	257.5 X 10 ⁶ SCF	grain/100 SCF		1000 Btu/SCF		
Gas (other)							
	SCFH	X 10 ⁶	grain/100		Btu/SCF		
Coal	SCFH TPH	X 10 ⁶ SCF Tons	grain/100 SCF % by wt		Btu/SCF Btu/lb		
Coal Other *	SCFH TPH	X 10 ⁶ SCF Tons	grain/100 SCF % by wt		Btu/SCF Btu/lb		
Coal Other *	SCFH TPH	X 10 ⁶ SCF Tons	grain/100 SCF % by wt		Btu/SCF Btu/lb		
Coal Other *	SCFH TPH	X 10 ⁶ SCF Tons	grain/100 SCF % by wt		Btu/SCF Btu/lb		

		Section	B - Pro	cesses Informat	ion		
1. Source Info	ormation						
Source Descriptio	n (give type, use, i	raw materials	s, produc	t, etc). Attach additic	onal sheets a	as necessary.	
Manufacturer Model No. Number of Sources Dresser Rand TV-10 1							
Source Designatio	วท		Maximu 4 200 h	ım Capacity	Rate	ed Capacity	
Type of Material F	Processed			r	I		
Maximum Opera	ting Schedule						
Hours/Day 24	Days 7	/Week		Days/Year 365		Hours/Year 8760	
Operational restrie	ctions existing or re	equested, if a	any (e.g.,	bottlenecks or volun	tary restrictio	ons to limit PTE)	
Capacity (specify	y units)			1			
Per Hour	Per D	ay		Per Week	.L.	Per Year	
29.4 MIMBlu/nr		IVIIVIBLU/a		4939.2 MIMBlu/wee	eK	257,544 MMBlu/yr	
Hours/Day	Days	/Week		Days/Year		Hours/Year	
24	7			365		8760	
Seasonal variation	ns (Months) Fro	m		to			
2 Fuel							
Z. Fuel	Quantity				% Ash		
Туре	Hourly	Ann	ually	Sulfur	(Weight)	BTU Content	
Oil Number	GPH 60	@ °F	X 10 ³ Gal	% by wt		Btu/Gal. & Lbs./Gal. @ 60 °F	
Oil Number	GPH 60	@ °F	X 10³ Gal	% by wt		Btu/Gal. & Lbs./Gal. @ 60 °F	
Natural Gas	2.94E-02 SCF	-H 257.	5 X 10 ⁶ SCF	grain/100 SCF		1000 Btu/SCF	
Gas (other)	SCF	Ή	X 10 ⁶ SCF	grain/100 SCF		Btu/SCF	
Coal	TF	Ч	Tons	% by wt		Btu/lb	
Other *							
<u> </u>							
*Note: Describe a	and furnish informa	ition separate	ely for oth	ner fuels in Addendu	n B.	1	

Section B - Processes Information (Continued)							
3. Burner - NA							
Manufacturer	Type and I	Model No.			Number of Burners		
Description:							
Detect Concests		Marineros					
Rated Capacity			apacity				
4. Process Storage Vessels							
A. For Liquids:							
Name of material stored							
	Manufacturer			Date Insta	lled		
TBD	Manufacturer			TBD			
Maximum Pressure		Capacity	(gallons/N	leter ³)			
		10,000					
Type of relief device (pressure set vent	conservation vent	/emergency v	vent/open v	ent)			
Relief valve/vent set pressure (psig)		Vapor pr	Vapor press. of liquid at storage temp. (psia/kPa)				
Type of Poof: Describe:							
Type of Root. Describe.							
Total Throughput Day Year		Number	of fillo non				
rotar miougriput Per fear		Filling Ra	Filling Rate (gal./min.):				
		Duration	of fill hr./fil	l):			
B. For Solids		Nome of	Matarial C	torod			
	er, Describe	name or	Material S	lorea			
Silo/Storage Bin I.D. No.	Manufacturer			Date Insta	lled		
State whether the material will be store	d in looso or bogs	in silos	Capacity	(Tone)			
	u in loose of bags	11 51105	Capacity	(10115)			
Turn over per year in tons			Turn ove	r per day in	tons		
Describe fugitive dust control system for loading and handling operations							
Describe material handling system							
5. Request for Confidentiality							
Do you request any information on this	application to be tr	reated as "Co	onfidential"?	<u> </u>	Yes 🗌 No		
If yes, include justification for confidentiality. Place such information on separate pages marked "confidential".							

Section B - Processes Information (Continued)

Miscellaneous Information 6.

Attach flow diagram of process giving all (gaseous, liquid and solid) flow rates. Also, list all raw materials charged to process equipment, and the amounts charged (tons/hour, etc.) at rated capacity (give maximum, minimum and average charges describing fully expected variations in production rates). Indicate (on diagram) all points where contaminants are controlled (location of water sprays, collection hoods, or other pickup points, etc.). Describe collection hoods location, design, airflow and capture efficiency. Describe any restriction requested and how it will be monitored. Natural gas fired engines will be controlled by SCR (injection of ammonia and reaction with NOx over catalyst)

Describe fully the facilities provided to monitor and to record process operating conditions, which may affect the emission of air contaminants. Show that they are reasonable and adequate.

Ammonia slip will be limited to 10 ppmvd and existing Title V monitoring will be continued.

Describe each proposed modification to an existing source. Installation of SCR system on Engines 1 and 2

Identify and describe all fugitive emission points, all relief and emergency valves and any by-pass stacks. See Appendix A for fugitive emissions.

Describe how emissions will be minimized especially during start up, shut down, process upsets and/or disruptions. Emissions are minimized by following manufacturer's specifications and minimizing downtime.

Anticipated Milestones:

ii

- Expected commencement date of construction/reconstruction/installation: i. Expected completion date of construction/reconstruction/installation:
- See Section 4 See Section 4 See Section 4

iii. Anticipated date of start-up:

Section C - Air Cleaning Device									
1. Precontrol Emissions* - 131									
		Maximum E	mission Rate	1	Calculation/				
Pollutant	Specify Units	Pounds/Hour	Hours/Year	Tons/Year	Estimation Method				
PM		_							
PM ₁₀		_							
SO _x		_	• •	1. A					
	2.0 g/bbp.br	_	See App	endix A					
NOx	2.0 g/pnp-nr	_							
Others: (e.g. HA	Dc)								
	.====								
Precont	rol Emissions* - 132								
		Maximum E	mission Rate		Calculation/				
Pollutant	Specify Units	Pounds/Hour	Hours/Year	Tons/Year	Method				
PM									
PM10									
SO _x									
NO _v	2 0 a/bhp-hr	_	See App	enaix A					
VOC	2.0 g/bhp m								
Others: (e.g., HA	Ps)								
* These emissio	ns must be calculated ba	used on the requested	d operating schedule	e and/or process rat	e, e.g., operating				
schedule for m	aximum limits or restricte	d hours of operation	and/or restricted three	oughput. Describe I	now the emission				
values were de	etermined. Attach calculat	lions.							
2. Gas Coolir	ng - <mark>NA</mark>								
Water quenching	🗌 Yes 🛛 No	Water injection rate		GPM					
Radiation and co	nvection cooling	A	ir dilution	Yes 🗌 No					
🗌 Yes 🗌 N	FM								
Forced Draft Yes No Water cooled duct work Yes No									
Other									
Inlet Volume ACFM Outlet Volume ACFM									
@°F	% Moisture	Ø	②°F	<u>%</u> Moisture					
Describe the syst	tem in detail.								

Section C - Air Cleaning Device (Continued)									
3. Settling Chambers - NA									
Manufacturer	/olume of gas handled ACF D°F	d M	Gas velocity	(ft/sec.)					
Length of chamber (ft.) Width of	chamber (ft.)	Height of chamb	t of chamber (ft.) Number of trays						
Water injection Yes No		Water injection r	ate (GPM)						
Emissions Data									
Inlet	Ou	tlet	R	emoval Efficiency (%)					
4 Inertial and Cyclone Collectors	- NΔ								
Manufacturer	Туре		Model N	o.					
Pressure drop (in. of water)	Inlet volume @	ACFM °F	ACFM Outlet volumeACFM°F @°F						
Number of individual cyclone(s)	-	Outlet straighten	ing vanes use lo	ed?					
Length of Cyclone(s) Cylinder (ft.)	Diameter of Cyclon	r of Cyclone(s) Cylinder (ft.) Length of Cyclone(s) cone (ft.)		f Cyclone(s) cone (ft.)					
Inlet Diameter (ft.) or duct area (ft. ²) of c	yclone(s)	Outlet Diameter (ft.) or duct area (ft. ²) of cyclone(s)							
If a multi-clone or multi-tube unit is insta	lled, will any of the inc	lividual cyclones o	r cyclone tube	es be blanked or blocked off?					
Describe any exhaust gas recirculation loop to be employed.									
Attach particle size efficiency curve									
Emissions Data									
Inlet	Ou	tlet	R	emoval Efficiency (%)					

Section C - Air Cleaning Device (Continued)									
5. Fabric Collector- NA									
Equipment Specifications									
Manufacturer			Мос	lel No.			Pressurized Design Suction Design		
Number of Compartments		Number of Filter	s Per	Compartment	Is Bagh	nouse	Insulated?		
						Yes	🗌 No		
Can each compartment be iso	olated for re	pairs and/or filter	repla	cement?		Yes	🗌 No		
Are temperature controls prov	/ided? (Des	cribe in detail)				Yes	□ No		
Dew point at maximum moist	ure	°F	[Design inlet volume	•		SCFM	N	
Type of Fabric									
Material		Felted		🗌 Membra	ine				
Weight	_oz/sq.yd	🗌 Woven	I	Others:	List:				
Thickness	in	Elted-	Wove	en					
Fabric permeability (clean) @	$\frac{1}{2}$ " water- Δ	Р		_CFM/sq.ft.					
Filter dimensions Length		Diame	eter/V	Vidth					
Effective area per filter			I	Maximum operating	tempera	ature ((°F)		
Effective air to cloth ratio	Minimu	m	<u> </u>	Maximum		_			
Drawing of Fabric Filter A sketch of the fabric filter and temperature indicator s	showing all should be at	access doors, ca tached.	itwalk	s, ladders and exh	aust duc	twork	, location of each press	sure	
Operation and Cleaning									
Volume of gases handled		Pressure dro	p acr	oss collector (in. of	water).				
ACFM @	°F	_ Describe the	equi	oment to be used to	o monitor	the p	ressure drop.		
Type of filter cleaning							A* 1 /		
Manual Cleaning			e na			/erse /	Air Jets		
Pneumatic Shakers		Reverse Air I	Flow					—	
Describe the equipment provi	ided if dry oi	il free air is require	ed foi	r collector operation	1				
Cleaning Initiated By		Frequency if tim	er ac	tuated					
Expected pressure drop	range		in.	of water Of	ther Spe	cify _			
Does air cleaning device emp	oloy hopper	heaters, hopper v	/ibrate	ors or hopper level	detectors	s? Ify	/es, describe.		
Describe the warning/alarm system that protects against operation when the unit is not meeting design requirements.									
Emissions Data					•				
Pollutant		Inlet		Outlet		Re	emoval Efficiency (%)		

Section C - Air Cleaning Device (Continued)									
6. Wet Collection Equ	ipment- <mark>NA</mark>								
Equipment Specification	S	i		i					
Manufacturer		Туре		Model No					
Design Inlet Volume (SCF	M)		Relative Particulate/Gas	Velocity (e	jector scrubbers only)				
Describe the internal feat limiters, etc.).	Describe the internal features (e.g., variable throat, gas/liquid diffusion plates, spray nozzles, liquid redistributors, bed limiters, etc.).								
Describe pH monitoring ar	nd pH adjustme	nt systems, if ap	plicable.						
Describe mist eliminator o	r separator (typ	e, configuration,	backflush capability, freq	luency).					
Attach particulate size effic	ciency curve.								
Operating Parameters									
Inlet volume of gases han	dled	(ACFM)	Outlet volume of ga	ses handle	d (ACFM)				
	@	°F	@	°F	<u>%</u> Moisture				
Liquid flow rates. Description recirculating solution, mak Describe scrubber liquid s etc.)	ribe equipment eup water, blee upply system (a	t provided to me ed flow, etc.) amount of make-	easure liquid flow rates	d, capacity	oer (e.g., quenching section,				
State pressure drop range (in water) across scrubber (e.g., venturi throat, packed bed, etc.) only. Describe the equipment provide to measure the pressure drop. Do not include duct or de-mister losses.									
Dellutent		nlot	Outlet		Domoval Efficiency (9/)				
Fonutani	I	IIIEL	Outlet		Removal Emclency (%)				

Section C - Air Cleaning Device (Continued)								
7. Electrostatic Preci	oitator- NA							
Equipment Specification	S							
Manufacturer		Model No			☐ Wet ☐ Single	e-Stage	☐ Dry ☐ Two-Stage	
Gas distribution grids]Yes 🗌 No		D N	esign Inlet Volume (laximum operating te	SCFM) emperature (°F)		
Total collecting surface are Number of fields	ea	sq. ft.	Collec Numb	tor plates size length er of collector plates	í	ft. x width	ft.	
Spacing between collector	plates	ine	ches.	·				
Maximum gas velocity	f	t./sec.	Minim	um gas treatment tin	ne:	sec.		
Total discharge electrode Number of discharge elect	length rodes	ft.	Numb	er of collecting electr	ode rappers	·		
Rapper control	Magnetic	🗌 Pneuma	tic	Other		[Describe in detail	
Operating Parameters								
Inlet gas temperature (°F)				State pressure dr	op range (in	ches water	gauge) across	
Outlet gas temperature (°	F)			Describe the equipment				
Volume of gas handled (A	(CFM)			Dust resistivity (ohm-cm). Will resistivity vary?				
Power requirements				-1				
Number and size of Trans	former Rectifier	sets by ele	ctrical f	field				
Field No.	No. of S	Sets	Ea	ach Transformer KVA	ch Transformer KVA KV Ave./		ectifier Ma DC	
					_			
Current Density		Corona Po	ower	Corona Power Density			ity	
Micro ampe	res/ft².		Wa	Watts/1000 ACFM Watts/ft ² .			/ft ² .	
Will a flue gas conditioning	g system be em	ployed? If y	yes, de	scribe it.				
Does air cleaning device e	mploy hopper h	neaters, hop	oper vib	prators or hopper leve	el detectors?	lf yes, de	scribe.	
Describe the warning/alarr	n system that p	protects aga	inst ope	eration when unit is r	not meeting o	design requ	iirements.	
Emissions Data								
Pollutant	I	nlet		Outlet		Remov	val Efficiency (%)	

Section C - Air Cleaning Device (Continued)									
8. Adsorption Equipment- NA									
Equipment Specification	S								
Manufacturer		Туре		Model No.					
Design Inlet Volume (SCF	M)	Adsorb	ent charge per adsorber	vessel and number of adsorber vessels					
Length of Mass Transfer Z	Cone (MTZ), sup	plied by the mar	ufacturer based upon la	boratory data.					
Adsorber diameter (ft.) and	d area ft².)		Adsorption bed dep	th (ft.)					
Adsorbent information									
Adsorbent type and physic	cal properties.								
Working capacity of adsor	bent (%)		Heel percent or u adsorbent after reg	Heel percent or unrecoverable solvent weight % in the adsorbent after regeneration.					
Operating Parameters									
Inlet volume of gases han	dled	_ (ACFM) @ _	°F						
Adsorption time per adsor	otion bed		Breakthrough capa Lbs. of solvent / 100	city:) lbs. of adsorbent =					
Vapor pressure of solvents	s at the inlet tem	perature	Available steam in papplicable)	Available steam in pounds to regenerate carbon adsorber (if applicable)					
Percent relative saturation	of each solvent	at the inlet temp	perature						
Attach any additional data including auxiliary equipment and operation details to thoroughly evaluate the control equipment.									
Describe the warning/alarm system that protects against operation when unit is not meeting design requirements.									
Emissions Data									
Pollutant	In	let	Outlet	Removal Efficiency (%)					

Section C - Air Cleaning Device (Continued)									
9. Absorption Equipn	nent- <mark>NA</mark>								
Equipment Specifications									
Manufacturer		Туре			Model No	D.			
Design Inlet Volume (SCF	M)		Τον	wer height (ft.) ar	nd inside d	iameter (ft.)			
Packing type and size (if a	pplicable)		Не	ight of packing (fi	t.) (if applic	cable)			
Number of trays (if applica	ble)		Nu	mber of bubble c	aps (if app	licable)			
Configuration	t 🗆] Cross flow		Cocurrent flor	w				
Describe pH and/or other	monitoring and	controls.							
Absorbent information			÷						
Absorbent type and conce	ntration.		Re	tention time (sec	.)				
Attach equilibrium data for	absorption (if a	applicable)							
Attach any additional info recirculating, system capa and recirculation.	ormation regard city, etc.) to tho	ding auxiliary equ roughly evaluate t	lipmen he con	t, absorption so trol equipment. I	lution sup Indicate th	ply system (once through or e flow rates for makeup, bleed			
Operating Parameters									
Volume of gas handled (A	CFM) Inle	t temperature (°F)		Pressure drop Describe the m	o (in. of v nonitoring (water) and liquid flow rate. equipment.			
State operating range for pH and/or absorbent concentration in scrubber liquid.									
Describe the warning/alarm system that protects against operation when unit is not meeting design requirements.									
Emissions Data									
Pollutant Inlet Outlet Removal Efficiency (%)									

Section C - Air Cleaning Device (Continued)									
10. 🛛 Selective Catal	ytic Reduction	(SCR) – Engine 1	(131)						
Selective Non-Catalytic Reduction (SNCR)									
Non-Selective Catalytic Reduction (NSCR)									
Equipment Specifications									
Manufacturer		Туре		Model N	0.				
AeriNOx									
Design Inlet Volume (SCF	M)		Design operating te	mperature	e (°F)				
Is the system equipped w details.	ith process cor	ntrols for proper m	ixing/control of the red	ucing age	nt in gas stream? If yes, give				
Yes, equipped with an am	monia dosing p	anel which include	s; steel dosing valve, n	nagnetic v	alves, and shut-off valves.				
Attach efficiency and other	r pertinent infor	mation (e.g., ammo	onia slip)						
10 ppmvd									
Operating Parameters									
Volume of gases handled		(ACFM) @	°F						
Operating temperature ra	nge for the SCI	R/SNCR/NSCR sy	stem (°F) From	450	°F To <u>950 (approx.)</u> °F				
Reducing agent used, if ar	ıy		Oxidation catalyst u	ised, if any	1				
19% Aqueous NH3			Oxidation Catalyst						
State expected range of us	sage rate and c	oncentration.							
Service life of catalyst			Ammonia slip (ppm)					
16,000 hours			10						
Describe fully with a ske	etch giving loc	ations of equipme	ent, controls systems,	importan	t parameters and method of				
Operation. The proposed Aer dosing rate. The p temperature as we	iNOx system will m post- SCR NOx ser ell as the differentia	easure pre-SCR with a nsor will trim/bias the d I pressure across the S	a NOx sensor and then using osing command. The system SCR reactor	g fuel flow ar m will also be	nd fuel composition to calculate the e monitoring the pre/post SCR				
Describe the warning/alarr	n system that p	rotects against op	eration when unit is not	t meeting o	design requirements.				
SCR Control is a single PLC based control system that includes Siemens Programmable Logic Controller (Simatic 1200). Parameters measures: SCR inlet/outlet, delta P, and flow measurement									
Emissions Data									
Pollutant Inlet Outlet Removal Efficiency (%)									
NOx	2.0 g/bhp-hr		0.6 g/bhp-hr		70%				

2700-PM-AQ0007 Rev. 7/2004										
Section C - Air Cleaning Device (Continued)										
10. Selective Catalytic Reduction (SCR) – Engine 2 (132)										
Selective Non-Catalytic Reduction (SNCR)										
Non-Selective	Catalytic Reduc	ction (NSCR)								
Equipment Specification	ns									
Manufacturer	Manufacturer Type Model No.									
AeriNOx										
Design Inlet Volume (SCF	FM)		Design operating te	mperature (°F)						
Is the system equipped w details.	vith process con	trols for proper mix	ing/control of the red	ucing agent in gas stream? If yes, give						
Yes, equipped with an am	nmonia dosing pa	anel which includes	; steel dosing valve, n	nagnetic valves, and shut-off valves.						
Attach efficiency and othe	er pertinent inform	nation (e.g., ammor	nia slip)							
10 ppmvd										
Operating Parameters										
Volume of gases handled	t	(ACFM) @	°F							
Operating temperature ra	ange for the SCF	R/SNCR/NSCR sys	tem (°F) From	<u>450</u> °F To <u>950 (approx.)</u> °F						
Reducing agent used, if a	iny		Oxidation catalyst u	sed, if any						
19% Aqueous NH3			Oxidation Catalyst							
State expected range of u	isage rate and co	oncentration.								
Service life of catalyst			Ammonia slip (ppm))						
16,000 hours			10							
Describe fully with a sk operation. The proposed Aer dosing rate. The p temperature as we	Describe fully with a sketch giving locations of equipment, controls systems, important parameters and method of operation. The proposed AeriNOx system will measure pre-SCR with a NOx sensor and then using fuel flow and fuel composition to calculate the dosing rate. The post- SCR NOx sensor will trim/bias the dosing command. The system will also be monitoring the pre/post SCR temperature as well as the differential pressure across the SCR reactor									
Describe the warning/alar	m system that p	rotects against oper	ation when unit is not	meeting design requirements.						
SCR Control is a single P Parameters measures: SC	LC based contro CR inlet/outlet, de	l system that includ elta P, and flow mea	es Siemens Program asurement	mable Logic Controller (Simatic 1200).						
Emissions Data	Emissions Data									
Pollutant	Ir	nlet	Outlet	Removal Efficiency (%)						
NOx	2.0 g/bhp-hr		0.6 g/bhp-hr	70%						

Section C - Air Cleaning Device (Continued)										
11. Oxidizer/Afterburne	11. Oxidizer/Afterburners - NA									
Equipment Specification	IS									
Manufacturer		Туре 🗌	Th	ermal 🗌 Catalytic	Model No.					
Design Inlet Volume (SCF	M)	Combustior chamber vo	n c olum	chamber dimensions (le ne, etc.)	ength, cross-sectional area, effective					
Describe design features,	Describe design features, which will ensure mixing in combustion chamber.									
Describe method of pre applicable).	eheating incon	ning gases	(if	Describe heat exchanged applicable).	ger system used for heat recovery (if					
Catalyst used	Life of catalys	st	Ex acı	pected temperature rise ross catalyst (°F)	Dimensions of bed (in inches). Height: Diameter or Width: Depth:					
Are temperature sensing of If yes, describe.	levices being p	rovided to me	easu	ure the temperature rise a	cross the catalyst? Yes No					
Describe any temperature or sketch.	sensing and/or	recording de	vice	es (including specific loca	tion of temperature probe in a drawing					
Burner Information										
Burner Manufacturer		Model No.			Fuel Used					
Number and capacity of b	urners	Rated capa	city	(each)	Maximum capacity (each)					
Describe the operation of	the burner	1		Attach dimensioned diagram of afterburner						
Operating Parameters										
Inlet flow rate (ACFM)	@	°F		Outlet flow rate (ACFM)@°F					
State pressure drop range water).	across catalyti	c bed (in. of		Describe the method ac the used catalyst.	lopted for regeneration or disposal of					
Describe the warning/alarm system that protects against operation when unit is not meeting design requirements.										
Emissions Data										
Pollutant	I	nlet		Outlet	Removal Efficiency (%)					
			-							

Section C - Air Cleaning Device (Continued)										
12. Flares- NA										
Equipment Specification	IS									
Manufacturer		Type 🗌 Ele	vated flare	🗌 Grou	nd flare Describe	Model No.				
Design Volume (SCFM)		Dimensions of Diameter	stack (ft.)	Height						
Residence time (sec.) and temperature (°F)	l outlet	Turn down rati)		Burner details					
Describe the flare design flare with a sketch.	Describe the flare design (air/steam-assisted or nonassisted), essential auxiliaries including pilot flame monitor of proposed flare with a sketch.									
Describe the operation of	the flare's ignit	ion system.								
Describe the provisions to	introduce auxi	liary fuel to the fla	ire.							
Operation Parameters										
Detailed composition of th	ne waste gas	Heat content			Exit velocity					
Maximum and average ga	s flow burned	(ACFM)	Operating	temperature	(°F)					
Describe the warning/alarm system that protects against operation when unit is not meeting design requirements.										
Emissions Data										
Pollutant		Inlet		Outlet	Removal E	fficiency (%)				

Section C - Air Cleaning Device (Continued)										
13. Other Control Equipment- NA										
Equipment Specification	S									
Manufacturer		Туре		Model No.						
Design Volume (SCFM)	Design Volume (SCFM) Capacity									
Describe pH monitoring ar	nd pH adjustme	nt, if any.								
Indicate the liquid flow rate	Indicate the liquid flow rate and describe equipment provided to measure pressure drop and flow rate, if any.									
Attach efficiency curve and	Attach efficiency curve and/or other efficiency information.									
Attach any additional date	including auxili	ary equipment an	d operation details to the	proughly evaluate the control equipment.						
Operation Parameters										
Volume of gas handled										
AC	FM @	°F	% N	Noisture						
Describe fully giving important parameters and method of operation.										
Describe the warning/alarm system that protects against operation when unit is not meeting design requirements.										
Emissions Data										
Pollutant	I	nlet	Outlet	Removal Efficiency (%)						

Section C - Air Cleaning Device (Continued)

14. Costs

Indicate cost associated with air cleaning device and its operating cost (attach documentation if necessary)

	i			
Device	Direct Cost	Indirect Cost	Total Cost	Annual Operating Cost

15. Miscellaneous

Describe in detail the removal, handling and disposal of dust, effluent, etc. from the air cleaning device including proposed methods of controlling fugitive emissions.

Attach manufacturer's performance guarantees and/or warranties for each of the major components of the control system (or complete system).

Attach the maintenance schedule for the control equipment and any part of the process equipment that if in disrepair would increase air contaminant emissions.

Will the construction, modification, etc. of the sources covered by this application increase emissions from other sources at the facility? If so, describe and quantify. No If this project is subject to any one of the following, attach a demonstration to show compliance with applicable standards. a. Prevention of Significant Deterioration permit (PSD), 40 CFR 52? □ YES □ No b. New Source Review (NSR), 25 Pa. Code Chapter 127, Subchapter E? □ YES □ No c. New Source Performance Standards (NSPS), 40 CFR Part 60? □ YES □ No d. National Emissions Standards for Hazardous Air Pollutants (NESHAP), □ YES □ No d. National Emissions Standards for Hazardous Air Pollutants (NESHAP), □ YES □ NO e. Maximum Achievable Control Technology (MACT) 40 CFR Part 63? □ YES □ NO (If Yes, which part) ZZZZ – no change □ □ YES □ NO Attach a demonstration showing that the emissions from any new sources will be the minimum attainable through the use of best available technology (BAT). No new sources – BAT is not applicable. Provide emission increases and decreases in allowable (or potential) and actual emissions within the last five (5) years for applicable PSD pollutant(s) if the facility is an existing major facility (PSD purposes). NA – no projected increase in emissions.	Section D - Additional Information		
No If this project is subject to any one of the following, attach a demonstration to show compliance with applicable standards. a. Prevention of Significant Deterioration permit (PSD), 40 CFR 52? □ YES NO b. New Source Review (NSR), 25 Pa. Code Chapter 127, Subchapter E? □ YES NO c. New Source Performance Standards (NSPS), 40 CFR Part 60? □ YES NO c. New Source Performance Standards (NSPS), 40 CFR Part 60? □ YES NO d. National Emissions Standards for Hazardous Air Pollutants (NESHAP), □ YES NO d. National Emissions Standards for Hazardous Air Pollutants (NESHAP), □ YES □ NO e. Maximum Achievable Control Technology (MACT) 40 CFR Part 63? □ YES □ NO Attach a demonstration showing that the emissions from any new sources will be the minimum attainable through the use of best available technology (BAT). No new sources – BAT is not applicable. Provide emission increases and decreases in allowable (or potential) and actual emissions within the last five (5) years for applicable PSD pollutant(s) if the facility is an existing major facility (PSD purposes). NA – no projected increase in emissions.	Will the construction, modification, etc. of the sources covered by this application increas the facility? If so, describe and quantify.	se emissions from o	ther sources at
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c. New Source Performance Standards (NSPS), 40 CFR Part 60? □ YES ☑ NO (If Yes, which subpart)	b. New Source Review (NSR), 25 Pa. Code Chapter 127, Subchapter E?	☐ YES	NO NO
d. National Emissions Standards for Hazardous Air Pollutants (NESHAP), 40 CFR Part 61? (If Yes, which subpart) Image: The Standards of the	c. New Source Performance Standards (NSPS), 40 CFR Part 60? (If Yes, which subpart)	☐ YES	⊠ NO
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Provide emission increases and decreases in allowable (or potential) and actual emissions within the last five (5) years for applicable PSD pollutant(s) if the facility is an existing major facility (PSD purposes). N/A – no projected increase in emissions.	No new sources – BAT is not applicable.		
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N/A – no projected increase in emissions.	applicable PSD pollutant(s) if the facility is an existing major facility (PSD purposes).	ons within the last tiv	e (5) years for
	N/A – no projected increase in emissions.		

Section D - Additional Information (Continued)

Indicate emission increases and decreases in tons per year (tpy), for volatile organic compounds (VOCs) and nitrogen oxides (NOx) for NSR applicability since January 1, 1991 or other applicable dates (see other applicable dates in instructions). The emissions increases include all emissions including stack, fugitive, material transfer, other emission generating activities, quantifiable emissions from exempted source(s), etc.

		Indicate Yes		VO	Cs	N	Ox
		or No if		Emission			
		emission		increases	Creditable	Emission	Creditable
		increases and		in	emission	increases	emission
D "		decreases		potential	decreases	in	decreases
Permit	Data	were used		to emit	in actual	potential	in actual
numper (if applicable)	Date	previously for	Source L.D. or Name	(toy)	emissions (tpv)		emissions (tpy)
	ISSUEU	neung	Source I. D. of Marine	(ipy)	(ipy)	(ipy)	(ipy)

If the source is subject to 25 Pa. Code Chapter 127, Subchapter E, New Source Review requirements,

a. Identify Emission Reduction Credits (ERCs) for emission offsets or demonstrate ability to obtain suitable ERCs for emission offsets.

b. Provide a demonstration that the lowest achievable emission rate (LAER) control techniques will be employed (if applicable).

c. Provide an analysis of alternate sites, sizes, production processes and environmental control techniques demonstrating that the benefits of the proposed source outweigh the environmental and social costs (if applicable).

Attach calculations and any additional information necessary to thoroughly evaluate compliance with all the applicable requirements of Article III and applicable requirements of the Clean Air Act adopted thereunder The Department may request additional information to evaluate the application such as a standby plan, a plan for air pollution emergencies, air quality modeling, etc.

Section E - Compliance Demonstration – NA TITLE V							
Note: Complete this section if source is not a Title V facility. Title V facilities must complete Addendum A.							
Method of Compliance Type: Check all that apply and complete all appropriate sections below							
☐ Monitoring ☐ Testing ☐ Reporting							
Recordkeeping Work Practice Standard							
Monitoring:							
a. Monitoring device type (Parameter, CEM, etc):							
b. Monitoring device location:							
c. Describe all parameters being monitored along with the frequency and duration of monitoring each parameter:							
Testing:							
a. Reference Test Method: Citation							
b. Reference Test Method: Description							
Recordkeeping:							
Describe what parameters will be recorded and the recording frequency:							
Reporting:							
a. Describe what is to be reported and frequency of reporting:							
b. Reporting start date:							
Work Practice Standard:							
Describe each:							

Section F - Flue and Air Contaminant Emission									
1. Estimated Atmos	pheric Emiss	ions* (131 a	& 132) (each)					
		Maximum emission rate							
Pollutant	specify u	nits	lbs/hr		tons/yr.	E	stimation Method		
PM									
PM ₁₀									
SOx									
СО									
NOx	0.6 g/bhp-hr	5.5	56	24.3	3	RAC	T III Limits		
VOC	0.5 g/bhp-hr	4.6	63	20.2	.8	RAC	T III Limits		
Others: (e.g., HAPs)									
* These emissions must schedule for maximum values were determined	st be calculated n limits or restr ed. Attach calc	d based on icted hours ulations.	the request of operation	ed operating and /or rest	schedule an ricted through	d/or proces nput. Desc	ss rate e.g., operating ribe how the emission		
2. Stack and Exhau	ster (131)								
Stack Designation/Num	ber S131								
List Source(s) or source	e ID exhausted	to this stac	k:	% of flow ex	nausted to sta	ack: 100%			
Stack height above grad Grade elevation (ft.)	de (ft.)	St	ack diameter	(ft) or Outle	t duct area (so	q. ft.)	f. Weather Cap		
Distance of discharge to	o nearest prop	erty line (ft.)). Locate on	topographic	map.				
Does stack height meet	Good Enginee	ring Practic	e (GEP)?						
If modeling (estimating) and other obstructions.) of ambient ai	r quality im	pacts is need	led, attach a	a site plan wit	h buildings	and their dimensions		
Location of sta Latitude/Longit	ck** tude		Latitude			Long	itude		
Point of Orig	in	Degrees	Minutes	Seconds	Degrees	Minutes	Seconds		
Stack exhaust Volume ACI	Stack exhaust Volume ACFM Temperature °F Moisture %								
Indicate on an attache necessary dimensions.	d sheet the lo	ocation of s	ampling por	ts with resp	ect to exhau	st fan, bree	eching, etc. Give all		
Exhauster (attach fan cu	irves	7.1	in. o	f water <u>4,200</u>)	HP @	RPM.		

2. Stack and Exhauster (132)									
Stack Designation/Number S132									
List Source(s) or source ID exhausted to this stack: % of flow exhausted to stack: 100									
Stack height above grade (ft.) Grade elevation (ft.)	St	ack diamet	er (ft) or Outlet	duct area (so	q. ft.)	f. Weather Cap			
Distance of discharge to nearest prope	erty line (ft.)). Locate o	n topographic r	map.					
Does stack height meet Good Enginee	ring Practic	e (GEP)?							
If modeling (estimating) of ambient air and other obstructions.	r quality im	pacts is ne	eded, attach a	site plan wit	h buildings	and their dimensions			
Location of stack** Latitude/Longitude		Latitude	•	Longitude					
Point of Origin	Degrees	Minutes	Seconds	Degrees	Minutes	Seconds			
Stack exhaust Volume ACFM	Temperatu	re °l	=	Moistu	ire	%			
Indicate on an attached sheet the location of sampling ports with respect to exhaust fan, breeching, etc. Give all necessary dimensions.									
Exhauster (attach fan curves) 7.1 in. of water 4,200 HP @ RPM.									
** If the data and collection method codes differ from those provided on the General Information Form-Authorization Application, provide the additional detail required by that form on a separate form.									

Section G - Attachments Number and list all attachments submitted with this application below: Appendix A: Emission Calculations Appendix B: General Information Form Appendix C: Plan Approval Forms Appendix D: Compliance Review Form Appendix E: Municipal Notifications



Addendum A: Source Applicable Requirements

Describe and cite all applicable requirements pertaining to this source. <u>Note:</u> A Method of Compliance Worksheet (Addendum 1) must be completed for each requirement listed.

Citation Number Citation Limitation		Limitation Used	
129.112	See Sections 2, 4, 5	See Sections 2, 4, 5	
1			



Addendum 1 Method Of Compliance Worksheet

SECTION 1. APPLICABLE REQUIREMENT						
Federal Tax Id:	55-0629203	Firm Name:	EGTS			
Plant Code:	Plant Code: 13 Plant Name: Punxsutawney Compressor Station					
Applicable Requi	rement for: (ple site	ease check only	ly one box below)			
A group of	sources, Group	ID: 131, 132	2			
A single so	urce, Unit ID:					
Alternative	Scenario, Scen	ario Name:				
Citation #: 129	.112, 129.114					
Compliance Meth	od based upon:		plicable Requirement Gap Filling Requirement			
Method of Compl	iance Type: (Cł	neck all that ap	pplies and complete all appropriate sections below)			
Monitori	ng 🖂	Testing	Reporting			
Record I	Record Keeping Work Practice Standard					
Section 2: Monitoring						
1. Monitoring device type (stack test, CEM, etc.): Stack test						
2. Monitoring device location: Outlet of control device						
Describe all parameters being monitored along with the frequency and duration of monitoring each parameter:						
Periodic source testing						
3. How will data	3. How will data be reported:					

2700-PM-AQ0018 6/2003 Addendum 1

Section 3: Testing

1.	Reference Test Method Description:	129.115
2.	Reference Test Method Citation:	129.115

Section 4: Record Keeping

Describe what parameters will be recorded and the frequency of recording: 129.115 as applicable

Section 5: Reporting

Describe what is to be reported and the frequency of reporting:

129.115 as applicable

1. Reporting start date: 129.115 as applicable

Section 6: Work Practice Standard

Describe any work practice standards:	
N/A	



Addendum A: Source Applicable Requirements

Describe and cite all applicable requirements pertaining to this source. <u>Note:</u> A Method of Compliance Worksheet (Addendum 1) must be completed for each requirement listed.

Citation Number Citation Limitation		Limitation Used	
129.112	See Sections 2, 4, 5	See Sections 2, 4, 5	
1			



Addendum 1 Method Of Compliance Worksheet

SECTION 1. APPLICABLE REQUIREMENT					
Federal Tax Id: 55-0629203	Firm Name:	EGTS			
Plant Code: 13	Plant Code: 13 Plant Name: Punxsutawney Compressor Station				
Applicable Requirement for: (ple	ease check only	y one box below)			
The entire site					
A group of sources, Group	ID:				
A single source, Unit ID:	P101				
Alternative Scenario, Scen	ario Name:				
Citation #: 129.112, 129.114					
Compliance Method based upon	: 🖂 Apr	olicable Requirement Gap Filling Requirement			
Method of Compliance Type: (Cl	heck all that ap	plies and complete all appropriate sections below)			
Monitoring	Testing	Reporting			
🖂 Record Keeping 🖂	Record Keeping X Work Practice Standard				
Section 2: Monitoring					
1. Monitoring device type (stack test, CEM, etc.): OGI, Method 21, or equivalent					
2. Monitoring device location: Fugitive emission sources					
Describe all parameters being monitored along with the frequency and duration of monitoring each parameter:					
See Section 5					
3. How will data be reported:					

2700-PM-AQ0018	6/2003
Addendum 1	

Section 3: Testing

1.	Reference Test Method Description:	See Section 5
2.	Reference Test Method Citation:	See Section 5

Section 4: Record Keeping

Describe what parameters will be recorded and the frequency of recording: See Section 5

Section 5: Reporting

Describe what is to be reported and the frequency of reporting:			
See Section 5			

1. Reporting start date: See Section 5

Section 6: Work Practice Standard

Describe any work practice standards:				
Leak detection and				
repair program with				
quarterly inspections				



Eastern Gas Transmission and Storage, Inc. 6603 West Broad Street Richmond, VA 23230

November 1, 2022

SUBMITTED VIA ONBASE

Eric Gustafson Air Quality Program Manager Northwest Regional Office Pennsylvania Department of Environmental Protection 230 Chestnut Street Meadville, PA 16335-3481

RE: <u>Eastern Gas Transmission and Storage, Inc.</u> <u>Air Pollution Control Act Compliance Review Supplemental Form</u>

Dear Mr. Gustafson:

Please find enclosed Eastern Gas Transmission and Storage, Inc.'s (EGTS) PADEP Air Pollution Control Act Compliance Review Supplemental Form. EGTS has elected to submit this document every six months in May and November for the previous six-month period.

If you have any questions regarding this submittal, please contact Glenn Boutillier at (804) 356-1364 or via email at Glenn.Boutillier@bhegts.com.

Sincerely,

Jeffrey Zehner, P.E. Manager, Environmental Services

Enclosure – Compliance Review Supplemental Form and Attachments





AIR POLLUTION CONTROL ACT COMPLIANCE REVIEW FORM

Fully and accurately provide the following information, as specified. Attach additional sheets as necessary.				
Type of Comp	liance Review Form Submittal (check all that apply)			
Original F	iling Date of Last Compliance Review Form Filing:			
Amended	Filing <u>05/02/2022</u>			
Type of Submi				
New Plan	Approval INew Operating Permit Renewal of Operating Permit			
	SECTION A. GENERAL APPLICATION INFORMATION			
Name of Appli (non-corporati	cant/Permittee/("applicant") ions-attach documentation of legal name)			
EASTERN GAS	STRANSMISSION AND STORAGE, INC.			
Address –	BHE GT&S, LLC			
_	6603 West Broad Street, Richmond, VA 23230			
Telephone _	(804) 356-1364 Taxpayer ID# 55-0629203			
Permit, Plan A	pproval or Application ID# N/A			
Permit, Plan Approval or Application ID# N/A Identify the form of management under which the applicant conducts its business (check appropriate box) Individual Syndicate Government Agency Municipality Municipal Authority Joint Venture Proprietorship Fictitious Name Association Public Corporation Partnership Other Type of Business, specify below: Private Corporation Limited Partnership Describe below the type(s) of business activities performed. No changes since previous submittal.				

SECTION B. GENERAL INFORMATION REGARDING "APPLICANT"

If applicant is a corporation or a division or other unit of a corporation, provide the names, principal places of business, state of incorporation, and taxpayer ID numbers of all domestic and foreign parent corporations (including the ultimate parent corporation), and all domestic and foreign subsidiary corporations of the ultimate parent corporated or unincorporated) and privately held corporations. (A diagram of corporate relationships may be provided to illustrate corporate relationships.) Attach additional sheets as necessary.

Unit Name	Principal Places of Business	State of Incorporation	Taxpayer ID	Relationship to Applicant
See Attachment A				

SECTION C. SPECIFIC INFORMATION REGARDING APPLICANT AND ITS "RELATED PARTIES"

Pennsylvania Facilities. List the name and location (mailing address, municipality, county), telephone number, and relationship to applicant (parent, subsidiary or general partner) of applicant and all Related Parties' places of business, and facilities in Pennsylvania. Attach additional sheets as necessary.

Unit Name	Street Address	County and Municipality	Telephone No.	Relationship to Applicant
See Attachment B				
Provide the names	and business addresses of a	Il general partners of	f the applicant	and parent and

subsidiary corporations, if any.					
Name	Business Address				
No changes since previous submittal.					

Г

Nar	ne	Business Address		
See Attachment C				
Plan Approvals or Department or an a	Operating Permits.	List all plan approvals tion control agency under	or operating permi	its issued by the
Plan Approvals or Department or an apparties that are curr form is notarized. issuance and expira	Operating Permits. pproved local air pollut ently in effect or have I This list shall include ttion dates. Attach add	List all plan approvals tion control agency unde been in effect at any time the plan approval and litional sheets as necessa	or operating permi r the APCA to the ap 5 years prior to the operating permit nu ary.	its issued by the pplicant or related date on which this umbers, locations,
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Compliance Background. (Note: Copies of specific documents, if applicable, must be made available to the Department upon its request.) List all documented conduct of violations or enforcement actions identified by the Department pursuant to the APCA, regulations, terms and conditions of an operating permit or plan approval or order by applicant or any related party, using the following format grouped by source and location in reverse chronological order. Attach additional sheets as necessary. See the definition of "documented conduct" for further clarification. Unless specifically directed by the Department, deviations which have been previously reported to the Department in writing, relating to monitoring and reporting, need not be reported.

Date	Location	Plan Approval/ Operating Permit#	Nature of Documented Conduct	Type of Department Action	Status: Litigation Existing/Continuing or Corrected/Date	Dollar Amount Penalty
11/17/2022	J.B. Tonkin Compressor Station	TVOP 65- 00634	Formaldehyde emissions exceeded	COA	Corrected/Completed 7/12/2022	\$TBD
						\$
						\$
						\$
						\$
						\$
						\$
						\$
						\$
						\$

List all incidents of deviations of the APCA, regulations, terms and conditions of an operating permit or plan approval or order by applicant or any related party, using the following format grouped by source and location in reverse chronological order. This list must include items both currently known and unknown to the Department. Attach additional sheets as necessary. See the definition of "deviations" for further clarification.

Date	Location	Plan Approval/ Operating Permit#	Nature of Deviation	Incident Status: Litigation Existing/Continuing Or Corrected/Date
See Attachment E				
CONTINUING OBL	IGATION	Annlicant is under a	continuina	obligation to undate this form using the

<u>CONTINUING OBLIGATION</u>. Applicant is under a continuing obligation to update this form using the Compliance Review Supplemental Form if any additional deviations occur between the date of submission and Department action on the application.

VERIFICATION STATEMENT

Subject to the penalties of Title 18 Pa.C.S. Section 4904 and 35 P.S. Section 4009(b)(2), I verify under penalty of law that I am authorized to make this verification on behalf of the Applicant/Permittee. I further verify that the information contained in this Compliance Review Form is true and complete to the best of my belief formed after reasonable inquiry. I further verify that reasonable procedures are in place to ensure that "documented conduct" and "deviations" as defined in 25 Pa Code Section 121.1 are identified and included in the information set forth in this Compliance Review Form.

Signature

10/17/2022 Date

John M. Lamb

Name (Print or Type)

VP, Eastern Pipeline Operations

Title

ATTACHMENT A - General Information (Section B)

NAME	FEDERAL	PRIMARY ADDRESS	PRIMARY	PRIMARY	STATE OF	RELATIONSHIP TO DETI
INAME	TAX ID		CITY	STATE	INCORPORATION	
Eastern Gas Transmission and Storage, Inc.	55-0629203	6603 West Broad Street	Richmond	PA	DE	Applicant
Eastern Gathering and Processing, Inc.	47-5154245	6603 West Broad Street	Richmond	PA	VA	Affiliated
NiCHe LNG, LLC	82-3638191	6603 West Broad Street	Richmond	PA	PA	Affiliated
REV LNG SSL BC, LLC	38-3944800	6603 West Broad Street	Richmond	PA	PA	Affiliated
BHE GT&S, LLC	85-1944244	6603 West Broad Street	Richmond	VA	VA	Parent Company
Berkshire Hathaway Energy	94-2213782	666 Grand Avenue	Des Moines	IA	IA	Parent Company to BHE GT&S, LLC
Berkshire Hathaway, Inc	47-0813844	3555 Farnam Street	Omaha	NE	DE	Ultimate Parent Company

ATTACHMENT B

Air Pollution Control Act Compliance Review Form – November 2022

Eastern Gas Transmission and Storage, Inc. Southcentral Region (Region III) – Harrisburg

Facility	Address	County	Township	Telephone #		
Chambersburg	1894 Warm Springs Rd, Chambersburg	Franklin	Hamilton	717-261-0144		
Perulack	2980 Pumping Station Rd, East Waterford	Juniata	Lack	717-734-1083		

ATTACHMENT B (Cont.) Air Pollution Control Act Compliance Review Form – November 2022

Eastern Gas Transmission and Storage, Inc. Northcentral Region (Region IV) – Williamsport

Facility	Address	County	Township	Telephone #			
Boom	86 Pumpstation Road Lawrenceville	Tioga	Lawrence	570-827-2401			
Centre	670 Witherite Road Pleasant Gap	Centre Spring		814-359-4535			
Ellisburg	685 Pump Station Road Genesee	Potter Genesee		814-228-3293			
Finnefrock	4600 Tamarack Road Renovo	Clinton	Clinton Leidy				
Greenlick	1211 Shephard Road Cross Fork	Road Potter Stewardson		570-923-1716			
Harrison	1001 Pleasant Valley Road	Potter	Harrison	814-334-5686			
Helvetia	527 Kriner Road Helvetia	Clearfield	Brady	814-583-7246			
Leidy	91 Gas Plant Lane Renovo	Clinton	Leidy	570-923-0800			
Luther	654 Carson Hill Road Luthersburg	Clearfield	Brady	724-387-5535			
Sabinsville	123 Pump Station Rd Westfield	Tioga	Tioga Clymer				
State Line	671 O'Donnell Road Genesee	Potter Genesee		814-228-3695			
Tioga	576 Palmer Road Lawrenceville	Tioga	Lawrenceville	570-835-5635			

ATTACHMENT B (Cont.) Air Pollution Control Act Compliance Review Form – November 2022

REV LNG SSL BC, LLC Northcentral Region (Region IV) – Williamsport

General Partner

Facility	Address	County	Township	Telephone #
Towanda	1002 Empson Road Ulysses	Potter	Ulysses	585-662-5738

ATTACHMENT B (cont.) Air Pollution Control Act Compliance Review Form – November 2022

Eastern Gas Transmission and Storage, Inc. Southwest Region (Region V) – Pittsburgh

Facility	Address	County	Township	Telephone #
Beaver	398 Thompson Run Road	Beaver	North Sewickley	412-847-9334
	Beaver Falls			
Crayne	657 Jefferson Road Waynesburg	Greene	Franklin	724-627-8622
J. B. Tonkin	4385 Hills Church Road Murrysville	Westmoreland	Murrysville	724-733-5448
Lincoln Heights	700 Beaver Road Jeannette	Westmoreland	Hempfield	724-523-2311
North Summit	252 Jumonville Road Hopwood	Fayette	North Union	724-438-8791
Oakford	6814 Route 22 W. Delmont	Westmoreland	Salem	724-468-4145
Rock Springs	304 Rock Springs Road Greensburg	Westmoreland	Salem	724-468-7709
South Oakford	267 McIlvaine Road Greensburg	Westmoreland	Hempfield	724-836-2755

ATTACHMENT B (cont.) Air Pollution Control Act Compliance Review Form – November 2022

Eastern Gas Transmission and Storage, Inc. (Operator) Eastern Gathering and Processing, Inc. (Owner) Southwest Region (Region V) – Pittsburgh

Facility	Address	County	Township	Telephone #		
Charleroi Propane Terminal	1875 Grange Road Charleroi	Washington	Fallowfield	814-636-3893		
Rabbit Pen Gate Site	891 Weigles Hill Road	Allegheny	Elizabeth	N/A		

ATTACHMENT B (cont.) Air Pollution Control Act Compliance Review Form – November 2022

Eastern Gas Transmission and Storage, Inc. Northwest Region (Region VI) – Meadville

Facility	Address	County	Township	Telephone #
Ardell	389 Crissman Road	Elk	Benezette	814-787-4817
	Weedville			
Big Run	1892 Bowers Road	Jefferson	Gaskill	814-427-2669
	Big Run			
Cherry Tree 3075 Arcadia Road Ind		Indiana	Montgomery	814-743-5372
Punxsutawney	88 Laska Road	Jefferson	Perry	814-939-0415
	Punxsutawney			
Rochester	64 Yoder Rd.	Indiana	North	814-938-0416
Mills	Punxsutawney		Mahoning	
Rural Valley	10612 State Route 85	Armstrong	Valley	814-938-0417
	Kittanning			
South Bend	104 CNG Street	Armstrong	South Bend	724-354-3433
	Shelocta			
Stoney Run	Strip Mine Road at Route 36	Jefferson	Gaskill	814-771-1165
	Bowersville			

Applicants

ATTACHMENT C BHE GT&S, LLC - Directors and Officers – November 2022

Title	Business Address
President, BHE GT&S	6603 West Broad Street, Richmond, VA 23230
Senior Vice President, General Counsel	6603 West Broad Street, Richmond, VA 23230
Vice President, Chief Financial Officer	6603 West Broad Street, Richmond, VA 23230
Vice President, Administrative Services	6603 West Broad Street, Richmond, VA 23230
Senior Vice President, Pipeline Operations	925 White Oaks Blvd., Bridgeport, WV 26330
Vice President, Eastern Pipeline Operations	925 White Oaks Blvd., Bridgeport, WV 26330
General Manager, Southern Pipeline Operations	121 Moore Hopkins Lane, Columbia, SC 29210
Vice President, Engineering & Construction	925 White Oaks Blvd., Bridgeport, WV 26330
Vice President, Commercial Services	6603 West Broad Street, Richmond, VA 23230
Vice President, LNG Operations	2100 Cove Point Road, Lusby, MD 20657
Vice President, Commercial LNG & Gas Development	6603 West Broad Street, Richmond, VA 23230
	TitlePresident, BHE GT&SSenior Vice President, General CounselVice President, Chief Financial OfficerVice President, Administrative ServicesSenior Vice President, Pipeline OperationsVice President, Eastern Pipeline OperationsGeneral Manager, Southern Pipeline OperationsVice President, Engineering & ConstructionVice President, Commercial ServicesVice President, LNG OperationsVice President, Commercial LNG & Gas Development

ATTACHMENT D Air Pollution Control Act Compliance Review Form

Eastern Gas Transmission and Storage, Inc. Plan Approvals/Operation Permits

Southcentral Region (Region III), Harrisburg

Permit	Location	Issuance Date	Expiration Date	Submitted Date
SOOP 28-03045	Chambersburg	March 31, 2021	March 31, 2026	
SOOP 34-03007	Perulack	April 15, 2020	April 30, 2025	

SOOP - State-Only Operating Permit

ATTACHMENT D Air Pollution Control Act Compliance Review Form

Eastern Gas Transmission and Storage, Inc. Plan Approvals/Operation Permits

Northcentral Region (Region IV), Williamsport

Permit	Location	Issuance Date	Expiration Date	Submitted Date
SOOP 59-00006	Boom	March 18, 2019	March 17, 2024	
NMOP 14-00040	Centre	March 19, 2019	March 18, 2024	
TVOP 53-00006	Ellisburg	April 5, 2021	April 4, 2026	
TVOP 18-00005	Finnefrock	March 26, 2019	March 25, 2024	
P.A. 18-00005E	Finnefrock	June 26, 2018	December 25, 2022	
TVOP 53-00005	Greenlick	August 4, 2021	August 3, 2026	
TVOP 53-00004 GP-1 53-00004A	Harrison Harrison	October 22, 2020 July 23, 2021	October 21, 2025 July 23, 2026	
NMOP 17-00002	Helvetia	April 2, 2018	April 1, 2023	
TVOP 18-00006	Leidy	May 27, 2021	May 26, 2026	
TVOP 17-00003	Luther	September 21, 2020	September 20, 2025	
TVOP 59-00005 GP-1 59-00005A	Sabinsville Sabinsville	April 13, 2018 September 21, 2021	April 12, 2023 September 21, 2026	
TVOP-53-00007	State Line	January 21, 2021	January 20, 2026	
TVOP-59-00002	Tioga	February 27, 2020	February 26, 2025	
NMOP 08-00052	Towanda*	September 14, 2021	September 13, 2026	

*REV LNG SSL BC, LLC (General Partner) P.A. – Plan Approval TVOP – Title V Permit SOOP – State-Only Operating Permit NMOP – State-Only Natural Minor Operating Permit GP – General Permit

ATTACHMENT D Air Pollution Control Act Compliance Review Form

Eastern Gas Transmission and Storage, Inc. Plan Approvals/Operation Permits

Southwest Region (Region V), Pittsburgh

Permit	Location	Issuance Date	Expiration Date	Submitted Date
TVOP 04-00490	Beaver	June 1, 2017	June 1, 2022	September 27, 2021
SOOP 63-00943	Charleroi Propane*	June 2, 2022**	June 2, 2027	
SOOP 30-00089	Crayne	March 11, 2021	March 11, 2026	
P.A. 30-00089D	Crayne	12/27/2017	November 28, 2022	
TVOP 65-00634	J.B. Tonkin	October 16, 2017	October 16, 2022	March 14, 2022 (renewal)
P.A. 65-00634A	J.B. Tonkin	June 21, 2018	March 28, 2023	August 25, 2022 (extension)
P.A. 65-00634B	J.B. Tonkin	April 28, 2022	March 28, 2023	August 25, 2022 (extension)
SOOP 65-00799	Lincoln Heights	March 3, 2021	March 3, 2026	
TVOP 26-00405	North Summit	April 21, 2021	April 21, 2026	
TVOP 65-00837	Oakford	October 15, 2018	October 15, 2023	
ACHD 0958-I001	Rabbit Pen	April 4, 2019	April 4, 2024	
TVOP 65-00983	Rock Springs	October 19, 2018	June 19, 2024	
TVOP 65-00840	South Oakford	June 22, 2018	June 22, 2023	

* Location is operated by Eastern Gas Transmission and Storage, Inc. and owned by Eastern Gathering and Processing, Inc.

** Permit was not received by EGTS until September 19, 2022.

ACHD – Allegheny County Health Department

P.A. – Plan Approval

TVOP – Title V Permit

SOOP - State-Only Operating Permit

ATTACHMENT D

Air Pollution Control Act Compliance Review Form

Eastern Gas Transmission and Storage, Inc. Plan Approvals/Operation Permits

Northwest Region (Region VI), Meadville

Permit	Location	Issuance Date	Expiration Date	Submitted Date
TVOP 24-00120	Ardell	October 1, 2019	September 30, 2024	
NMOP 33-00147	Big Run	March 16, 2020	February 28, 2025	
NMOP 32-00303	Cherry Tree	April 4, 2022	March 31, 2027	
TVOP 33-00140	Punxsutawney	October 23, 2017	October 31, 2022	April 25, 2022 (renewal)
SMOP 32-00129	Rochester Mills	April 4, 2022	March 31, 2027	
SOOP 03-00244	Rural Valley	August 21, 2019	August 21, 2024	
TVOP 03-00180	South Bend	September 23, 2016	September 23, 2021	February 26, 2021 (renewal)
NMOP 33-00152	Stoney Run	October 30, 2017	October 31, 2022	April 18, 2022 (renewal)

P.A. – Plan Approval

TVOP – Title V Permit

SOOP - State-Only Operating Permit

NMOP – Natural Minor Operating Permit

SMOP – Synthetic Minor Operating Permit

Attachment E - Incidents of Deviations

Air Pollution Control Act Compliance Review Form - November 2022

Eastern Gas Transmission and Storage, Inc.

(Incidents since previous submission)

Date of				
Deviation	Station/Source	Permit Number	Nature of Deviation	Incident Status/Action Tak
6/1/2022	Harrison Compressor Station / Source ID P103	TVOP 53-00004	Missed Portable Monitoring Event	Due to unplanned maintenance, Engine 3 (Source ID P103) was unavailable to compl May 31, 2022. EGTS plans to complete maintenance and have the engine available for second half 2

ken

lete portable emissions monitoring between March 1 and

2022 portable emissions monitoring.

APPENDIX E. MUNICIPAL NOTIFICATIONS



BHE GT&S, LLC 6603 West Broad Street Richmond, VA 23230

December 21, 2022

SUBMITTED VIA UPS

Jefferson County Commissioners 155 Main Street, 2nd Floor Brookville, PA 15825

SUBMITTED VIA UPS

Perry Township Supervisors PO Box 50 Hamilton, PA 15774

RE: <u>Eastern Gas Transmission and Storage, Inc.</u> <u>Punxsutawny Compressor Station – TVOP #33-00140</u> <u>RACT III Plan Approval Application</u>

Dear Commissioners:

BHE Eastern Gas Transmission and Storage, Inc. (EGTS) is providing this notification to the county and township regarding EGTS's request to obtain a Plan Approval Permit from the Pennsylvania Department of Environmental Protection's (DEP) Air Quality Program to install new equipment at its' natural gas compressor station located in Perry Township, Jefferson County, Pennsylvania (Punxsutawney Compressor Station). The site operates under Title V Operating Permit #33-00140 which was most recently revised on February 22, 2021.

Specifically, the permit application seeks to add Selective Catalytic Reduction (SCR) equipment to Engines 1 and 2 (Source ID 131 and 132) to comply with PA RACT III NOx emission limitations. EGTS is also proposing an alternative RACT limitation and alternative compliance schedule to comply with RACT requirements due to the installation of controls.

Pennsylvania Code Title 25 (Environmental Protection – Air Resources) Section 127.43a requires county notification including a 30-day comment period regarding the permit application, which begins upon receipt of this formal notification. During this comment period, DEP will accept such comments. Comments are to be sent to:

Air Quality Program PADEP – Northwest Regional Office 230 Chestnut Street Meadville, PA 16335

Should you have any questions pertaining to this matter, please contact me by phone at (804) 356-1364 or by email at glenn.boutillier@bhegts.com.

Sincerely,

Jeffrey R. Zehner, P.E. Manager, Environmental Services

From:	<u>UPS</u>
To:	Boutillier, Glenn (BHE GT&S)
Subject:	[EXTERNAL] UPS Delivery Notification, Tracking Number 1Z0R855X0111250833
Date:	Thursday, December 22, 2022 11:12:55 AM

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BHE GT&S - HQ

Tracking Number:	1Z0R855X0111250833
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Number of Packages:	1
UPS Service:	UPS Next Day Air®
Package Weight:	0.0 LBS
Reference Number:	TVOP #33-00140

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December 27, 2022 11:18 am

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December 27, 2022 11:17 am

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December 26, 2022

In Transit to Next Facility

December 24, 2022 10:04 pm

Arrived at USPS Regional Facility JOHNSTOWN PA DISTRIBUTION CENTER,

December 23, 2022 12:18 am

Departed USPS Regional Facility

RICHMOND VA DISTRIBUTION CENTER,

December 22, 2022 11:35 pm

Arrived at USPS Regional Facility

donotreply@pa.gov
Boutillier, Glenn (BHE GT&S)
RA-EP-ONBASENOT@pa.gov
[EXTERNAL] [RECEIVED] Scanned Forms review - Reference ID: 80680
Thursday, December 29, 2022 9:54:41 AM
ATT00001.png

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Dear Glenn Boutillier,

Thank you for submitting the AQ GENERAL CORRESPONDENCE form to DEP.

Region: NORTHWEST REGIONAL OFFICE County: JEFFERSON Municipality: PERRY TOWNSHIP Permit #/Project #: TVOP 33-00140 RPCO Reference ID#:

DEP Processing Comments (if any):

"EGTS Punxsutawney Compressor Station TVOP 33-00140 RACT III Compliance Report and Plan Approval"

We will review the document and associated information and notify you with any concerns.

Your form reference # is 80680. Please use this reference # for future inquiries to DEP and include on the check memo when remitting payment.

The DEP receipt date is 12/29/2022.



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