

COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION AIR QUALITY PROGRAM

PLAN APPROVAL

Issue Date:

January 14, 2015

Effective Date:

January 14, 2015

Expiration Date:

June 30, 2016

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

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

Plan Approval No. 52-00001A

Federal Tax Id - Plant Code: 31-0802435-13

Owner Information

Name: COLUMBIA GAS TRANS LLC

Mailing Address: 40 GROSSETT DR

KIRKWOOD, NY 13795

Plant Information

Plant: COLUMBIA GAS TRANS CORP/MILFORD COMP STA

Location: 52

Pike County

52909 Milford Township

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

Responsible Official

Name: JONATHAN C ARRON

Title: MANAGER OF OPERATIONS

Phone: (607) 721 - 0106

Plan Approval Contact Person

Name: JIM ALEXANDER

Title: NISOURCE AIR PERMITTING

Phone: (219) 647 - 5924

[Signature] 1/1

MARK J. WEJKSZNER,

MORTHEAST REGION AIR PROGRAMMANAGER



COLUMBIA GAS TRANS CORP/MILFORD COMP STA



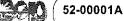
Plan Approval Description

This Plan Approval is being issued for the installation and operation of two (2) Solar Centaur 40-4700S natural gas fired turbines with SoLoNOx technology, one (1) Waukesha VGF-H24GL natural gas fired emergency generator, one (1) 1.25 MMBtu/hr natural gas fired line heater and twelve (12) 0.060 MMBtu/hr natural gas fired space heaters. Also, there will be one (1) 1,000 gallon wasterwater storage tank and one (1) 2,000 gallon condensate tank.

In addition, all existing sources at the station will be removed.

DEP Auth ID: 1010296







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

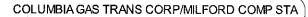
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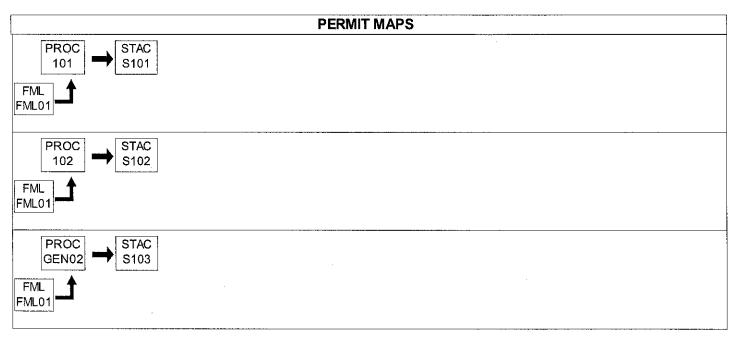
Section H. Miscellaneous





SECTION A. Plan Approval Inventory List

Source ID Source Name Capacity/Throughput Fuel/Material		
101	TURBINE 1 (SOLAR CENTAUR 4700HP)	
102	TURBINE 2 (SOLAR CENTAUR 4700HP)	
GEN02	EMERGENCY GENERATOR (WAUKESHA 585HP)	
FML01	NATURAL GAS	
S101	STACK - TURBINE 1	
S102	STACK - TURBINE 2	
S103	STACK - EMERGENCY GENERATOR 2	







SECTION B. General Plan Approval Requirements

#001 [25 Pa. Code § 121.1]

Definitions

Words and terms that are not otherwise defined in this plan approval shall have the meanings set forth in Section 3 of the Air Pollution Control Act (35 P.S. § 4003) and 25 Pa. Code § 121.1.

#002 [25 Pa. Code § 127.12b (a) (b)]

Future Adoption of Requirements

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

#003 [25 Pa. Code § 127.12b]

Plan Approval Temporary Operation

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

- (a) When construction, installation, modification, or reactivation is being conducted, the permittee shall provide written notice to the Department of the completion of the activity approved by this plan approval and the permittee's intent to commence operation at least five (5) working days prior to the completion of said activity. The notice shall state when the activity will be completed and when the permittee expects to commence operation. When the activity involves multiple sources on different time schedules, notice is required for the commencement of operation of each source.
- (b) Pursuant to 25 Pa. Code § 127.12b (d), temporary operation of the source(s) is authorized to facilitate the shakedown of sources and air cleaning devices, to permit operations pending the issuance of a permit under 25 Pa. Code Chapter 127, Subchapter F (relating to operating permits) or Subchapter G (relating to Title V operating permits) or to permit the evaluation of the air contaminant aspects of the source.
- (c) This plan approval authorizes a temporary operation period not to exceed 180 days from the date of commencement of operation, provided the Department receives notice from the permittee pursuant to paragraph (a), above.
- (d) The permittee may request an extension of the 180-day shakedown period if further evaluation of the air contamination aspects of the source(s) is necessary. The request for an extension shall be submitted, in writing, to the Department at least 15 days prior to the end of the initial 180-day shakedown period and shall provide a description of the compliance status of the source, a detailed schedule for establishing compliance, and the reasons compliance has not been established. This temporary operation period will be valid for a limited time and may be extended for additional limited periods, each not to exceed 180 days.
- (e) The notice submitted by the permittee pursuant to subpart (a) above, prior to the expiration of the plan approval, shall modify the plan approval expiration date on Page 1 of this plan approval. The new plan approval expiration date shall be 180 days from the date of commencement of operation.

#004 [25 Pa. Code § 127.12(a) (10)]

Content of Applications

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

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

Public Records and Confidential Information

- (a) The records, reports or information obtained by the Department or referred to at public hearings shall be available to the public, except as provided in paragraph (b) of this condition.
- (b) Upon cause shown by the permittee that the records, reports or information, or a particular portion thereof, but not emission data, to which the Department has access under the act, if made public, would divulge production or sales figures or methods, processes or production unique to that person or would otherwise tend to affect adversely the

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SECTION B. General Plan Approval Requirements

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

#006 [25 Pa. Code § 127.12b]

Plan Approval terms and conditions.

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

- (a) This plan approval will be valid for a limited time, as specified by the expiration date contained on Page 1 of this plan approval. Except as provided in § § 127.11a and 127.215 (relating to reactivation of sources; and reactivation), at the end of the time, if the construction, modification, reactivation or installation has not been completed, a new plan approval application or an extension of the previous approval will be required.
- (b) If construction has commenced, but cannot be completed before the expiration of this plan approval, an extension of the plan approval must be obtained to continue construction. To allow adequate time for departmental action, a request for the extension shall be postmarked at least thirty (30) days prior to the expiration date. The request for an extension shall include the following:
 - (i) Ajustification for the extension,
 - (ii) A schedule for the completion of the construction

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

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

#007 [25 Pa. Code § 127.32]

Transfer of Plan Approvals

- (a) This plan approval may not be transferred from one person to another except when a change of ownership is demonstrated to the satisfaction of the Department and the Department approves the transfer of the plan approval in writing.
- (b) Section 127.12a (relating to compliance review) applies to a request for transfer of a plan approval. A compliance review form shall accompany the request.
- (c) This plan approval is valid only for the specific source and the specific location of the source as described in the application.

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

- (a) Pursuant to 35 P.S. § 4008, no person shall hinder, obstruct, prevent or interfere with the Department or its personnel in the performance of any duty authorized under the Air Pollution Control Act.
- (b) The permittee shall also allow the Department to have access at reasonable times to said sources and associated air cleaning devices with such measuring and recording equipment, including equipment recording visual observations, as the Department deems necessary and proper for performing its duties and for the effective enforcement of the Air Pollution Control Act and regulations adopted under the act.





SECTION B. General Plan Approval Requirements

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

#009 [25 Pa. Code 127.13a]

Plan Approval Changes for Cause

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

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

#010 [25 Pa. Code §§ 121.9 & 127.216]

Circumvention

- (a) The permittee, or any other person, may not circumvent the new source review requirements of 25 Pa. Code Chapter 127, Subchapter E by causing or allowing a pattern of ownership or development, including the phasing, staging, delaying or engaging in incremental construction, over a geographic area of a facility which, except for the pattern of ownership or development, would otherwise require a permit or submission of a plan approval application.
- (b) No person may permit the use of a device, stack height which exceeds good engineering practice stack height, dispersion technique or other technique which, without resulting in reduction of the total amount of air contaminants emitted, conceals or dilutes an emission of air contaminants which would otherwise be in violation of this plan approval, the Air Pollution Control Act or the regulations promulgated thereunder, except that with prior approval of the Department, the device or technique may be used for control of malodors.

#011 [25 Pa. Code § 127.12c]

Submissions

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

Regional Air Program Manager

PA Department of Environmental Protection

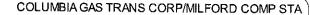
(At the address given on the plan approval transmittal letter or otherwise notified)

#012 [25 Pa. Code § 127.12(9) & 40 CFR Part 68]

Risk Management

- (a) If required by Section 112(r) of the Clean Air Act, the permittee shall develop and implement an accidental release program consistent with requirements of the Clean Air Act, 40 CFR Part 68 (relating to chemical accident prevention provisions) and the Federal Chemical Safety Information, Site Security and Fuels Regulatory Relief Act (P.L. 106-40).
- (b) The permittee shall prepare and implement a Risk Management Plan (RMP) which meets the requirements of Section 112(r) of the Clean Air Act, 40 CFR Part 68 and the Federal Chemical Safety Information, Site Security and Fuels Regulatory Relief Act when a regulated substance listed in 40 CFR § 68.130 is present in a process in more than the listed threshold quantity at the facility. The permittee shall submit the RMP to the Environmental Protection Agency according to the following schedule and requirements:
- (1) The permittee shall submit the first RMP to a central point specified by the Environmental Protection Agency no later than the latest of the following:







SECTION B. General Plan Approval Requirements

- (i) Three years after the date on which a regulated substance is first listed under § 68.130; or,
- (ii) The date on which a regulated substance is first present above a threshold quantity in a process.
- (2) The permittee shall submit any additional relevant information requested by the Department or the Environmental Protection Agency concerning the RMP and shall make subsequent submissions of RMPs in accordance with 40 CFR § 68.190.
- (3) The permittee shall certify that the RMP is accurate and complete in accordance with the requirements of 40 CFR Part 68, including a checklist addressing the required elements of a complete RMP.
- (c) As used in this plan approval condition, the term "process" shall be as defined in 40 CFR § 68.3. The term "process" means any activity involving a regulated substance including any use, storage, manufacturing, handling, or on-site movement of such substances or any combination of these activities. For purposes of this definition, any group of vessels that are interconnected, or separate vessels that are located such that a regulated substance could be involved in a potential release, shall be considered a single process.

#013 [25 Pa. Code § 127.25]

Compliance Requirement

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



SECTION C. Site Level Plan Approval Requirements

I. RESTRICTIONS.

Emission Restriction(s).

#001 [25 Pa. Code §123.1]

Prohibition of certain fugitive emissions

- (a) No person may permit the emission into the outdoor atmosphere of fugitive air contaminant from a source other than the following:
 - (1) Construction or demolition of buildings or structures.
 - (2) Grading, paving and maintenance of roads and streets.
- (3) Use of roads and streets. Emissions from material in or on trucks, railroad cars and other vehicular equipment are not considered as emissions from use of roads and streets.
 - (4) Clearing of land.
 - (5) Stockpiling of materials.
 - (6) Open burning operations.
 - (7) Blasting in open pit mines. Emissions from drilling are not considered as emissions from blasting.
 - (8) Not Applicable
- (9) Sources and classes of sources other than those identified in paragraphs (1)-(7), for which the operator has obtained a determination from the Department that fugitive emissions from the source, after appropriate control, meet the following requirements:
 - (i) the emissions are of minor significance with respect to causing air pollution; and
- (ii) the emissions are not preventing or interfering with the attainment or maintenance of any ambient air quality standard.

002 [25 Pa. Code §123.2]

Fugitive particulate matter

A person may not permit fugitive particulate matter to be emitted into the outdoor atmosphere from a source specified in 123.1(a)(1) -- (9) (relating to prohibition of certain fugitive emissions) if such emissions are visible at the point the emissions pass outside the person's property.

#003 [25 Pa. Code §123.31]

Limitations

MALODOR EMISSIONS

A person may not permit the emission into the outdoor atmosphere of any malodorous air contaminants from any source in a manner that the malodors are detectable outside the property of the person on whose land the source is being operated.

004 [25 Pa. Code §123.41]

Limitations

(a) Aperson may not permit the emission into the outdoor atmosphere of visible air contaminants in such a manner that the opacity of the emission is either of the following:





SECTION C. Site Level Plan Approval Requirements

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

005 [25 Pa. Code §129.14]

Open burning operations

- (a) The permittee may not permit the open burning of material in a manner that:
- (1) The emissions are visible, at any time, at the point such emissions pass outside the property of the person on whose land the open burning is being conducted.
- (2) Malodorous air contaminants from the open burning are detectable outside the property of the person on whose land the open burning is being conducted.
 - (3) The emissions interfere with the reasonable enjoyment of life or property.
 - (4) The emissions cause damage to vegetation or property.
 - (5) The emissions are or may be deleterious to human or animal health.
- (b) Exceptions. The requirements above do not apply where the open burning operations result from a fire set for any of the following reasons:
- (1) to prevent or abate a fire hazard, when approved by the Department and set by or under the supervision of a public officer.
 - (2) to instruct personnel in fire fighting, when approved by the Department.
 - (3) for the prevention and control of disease or pests, when approved by the Department.
- (4) in conjunction with the production of agricultural commodities in their unmanufactured state on the premises of the farm operation.
- (5) for the burning of domestic refuse, when the fire is on the premise of a structure occupied solely as a dwelling by two families or less and when the refuse results from the normal occupancy of the structure.
 - (6) for recreational or ceremonial purposes.
 - (7) solely for cooking food.
- (c) This permit does not constitute authorization to burn solid waste pursuant to Section 610(3) of the Solid Waste management Act, 35 P.S. Section 6018.610(3), or any other provision of the Solid Waste Management Act.

II. TESTING REQUIREMENTS.

006 [25 Pa. Code §139.1] Sampling facilities.

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





SECTION C. Site Level Plan Approval Requirements

III. MONITORING REQUIREMENTS.

007 [25 Pa. Code §123.43] Measuring techniques

- (a) Visible emissions may be measured using either of the following:
 - (1) A device approved by the Department and maintained to provide accurate opacity measurements.
- (2) Observers, trained and qualified to measure plume opacity with the naked eye or with the aid of any devices approved by the Department.

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

The permittee, within one (1) hour of discovery of an occurrence, shall notify the Department, by phone at (570) 826-2511, of any malfunction, record keeping or reporting errors, or other possible non-compliance issues, which reasonably is believed to either result in or possibly result in, or which results in, the emission of air contaminants in excess of the limitations specified in, or established pursuant to, any applicable rule or regulations contained in Article III of the Rules and Regulations of the Department of Environmental Protection. Awritten report shall be submitted to the Department within five working days following the initial notification describing the incident and the corrective actions taken or to be taken. The Department may take enforcement action for any violations of the applicable standards.

009 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

Any notification as a result of any condition herein should be directed to:

Mark J Wejkszner Air Quality Program Manager Department of Environmental Protection 2 Public Square Wilkes-Barre, PA 18701-1915

VI. WORK PRACTICE REQUIREMENTS.

010 [25 Pa. Code §123.1] Prohibition of certain fugitive emissions

- (a) The permittee shall take all reasonable actions to prevent particulate matter from becoming airborne. These actions shall include, but not be limited to, the following:
- (1) Use, where possible, of water or chemicals for control of dust in the demolition of buildings or structures, construction operations, the grading of roads, or the clearing of land.
- (2) Application of asphalt, oil, water or suitable chemicals on dirt roads, material stockpiles and other surfaces which may give rise to airborne dusts.
 - (3) Paving and maintenance of roadways.
- (4) Prompt removal of earth or other material from paved streets onto which earth or other material has been transported by trucking or earth moving equipment, erosion by water, or other means.





SECTION C. Site Level Plan Approval Requirements

VII. ADDITIONAL REQUIREMENTS.

011 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

Nothing in this Plan Approval relieves the facility owner or operator from the obligation to comply with all applicable Federal, state and local laws and regulations.

012 [25 Pa. Code §127,12b]

Plan approval terms and conditions.

The company shall not impose conditions upon or otherwise restrict the Department's access to the aforementioned source(s) and/or any associated air cleaning device(s) and shall allow the Department to have access at any time to said source(s) and associated air cleaning device(s) with such measuring and recording equipment, including equipment recording visual observations, as the Department deems necessary and proper for performing its duties and for the effective enforcement of the Air Pollution Control Act.

013 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

The permittee shall comply with all applicable requirements specified in 40 CFR Part 60 Subpart JJJJ - Standards of Performance for Stationary Spark Ignition Reciprocating IC Engines, 40 CFR, Part 63, Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines and 40 CFR Part 60 Subpart KKKK - Standards of Performance for Stationary Combustion Turbines. Copies of all requests, reports, applications, submittals, and other communications shall be sent to both EPA and the Department. The EPA copies shall be forwarded to:

US EPA, Region III

Associate Director, Office of Air Enforcement and Compliance Monitoring (3AP20)

1650 Arch Street

Philadelphia, PA 19103-2029

and

Mark J Wejkszner
Air Quality Program Manager
Department of Environmental Protection
2 Public Square
Wilkes-Barre, Pa 18701-1915

VIII. COMPLIANCE CERTIFICATION.

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

IX. COMPLIANCE SCHEDULE.

No compliance milestones exist,



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SECTION D. Source Level Plan Approval Requirements

Source ID: 101

Source Name: TURBINE 1 (SOLAR CENTAUR 4700HP)

Source Capacity/Throughput:

Conditions for this source occur in the following groups: GROUP 1



RESTRICTIONS.

No additional requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements) and/or Section E (Source Group Restrictions).

TESTING REQUIREMENTS.

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

MONITORING REQUIREMENTS. III.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements) and/or Section E (Source Group Restrictions).



SECTION D. Source Level Plan Approval Requirements

Source ID: 102

Source Name: TURBINE 2 (SOLAR CENTAUR 4700HP)

Source Capacity/Throughput:

Conditions for this source occur in the following groups: GROUP 1



RESTRICTIONS.

No additional requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements) and/or Section E (Source Group Restrictions).

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements) and/or Section E (Source Group Restrictions).

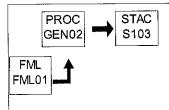


SECTION D. Source Level Plan Approval Requirements

Source ID: GEN02

Source Name: EMERGENCY GENERATOR (WAUKESHA 585HP)

Source Capacity/Throughput:



I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

Pursuant to the Best Available Technology (BAT) provisions of 25 Pa. Code Section 127.1, the permittee shall not allow the emission into the outdoor atmosphere of total particulate matter (TPM) from emergency generator in a manner that the concentration of TPM in the effluent gas exceeds 0.02 grain per dry standard cubic foot.

002 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

The permittee shall not allow the emission into the outdoor atmosphere of sulfur oxides (SOx) in a manner that the concentration of the SOx (expressed as SO2) in the effluent gas exceeds 500 parts per million, by volume, dry basis.

(The Permittee may choose to comply with this requirement by using only pipeline quality natural gas. Upon Department request, the Permittee shall obtain a certification of fuel sulfur content from the supplier, provide fuel analysis or fuel samples of fuel used, and/or provide a copy of the FERC tariff sheet in order to show that the fuel meets the requirements of (a) 0.25 grains of hydrogen sulfide (H2S) per 100 cubic feet of gas; and

(b) 2 grains of total sulfur per 100 cubic feet of gas)

Operation Hours Restriction(s).

003 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

The Emergency Generator shall not operate more than 500 hours during any consecutive 12-month period.

004 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

The permittee shall comply with all applicable Emission Standards requirements specified in 40 CFR Part 60 Subpart JJJJ 60.4233 through 60.4234.

II. TESTING REQUIREMENTS.

005 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

The permittee shall comply with all applicable Testing requirements specified in 40 CFR Part 60 Subpart JJJJ 60.4244.

III. MONITORING REQUIREMENTS.

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



SECTION D. Source Level Plan Approval Requirements

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

006 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

The permittee shall comply with all applicable Notification, Reporting and Records requirements specified in 40 CFR Part 60 Subpart JJJJ 60.4245.

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

007 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

The natural gas fueled engine is subject to 40 CFR, Part 60, Subpart JJJJ - Standards of Performance for Stationary Spark Ignited Internal Combustion Engines and the permittee shall comply with all applicable requirements of the subpart.

008 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

The permittee shall comply with all applicable Compliance requirements specified in 40 CFR Part 60 Subpart JJJJ 60.4243.

009 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

The permittee shall comply with all applicable Other requirements specified in 40 CFR Part 60 Subpart JJJJ 60.4235 through 60.4237.

010 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

The engine shall be designed to comply with the Compliance Requirements for Manufacturers specified in 40 CFR Part 60 Subpart JJJJ 60.4238 through 60.4242.



Group Name:

GROUP 1

Group Description: Turbines
Sources included in this group

ID Name	
101 TURBINE 1 (SOLAR CENTAUR 4700HP)	
102 TURBINE 2 (SOLAR CENTAUR 4700HP)	
FML01 NATURAL GAS	

I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

- (a) Pursuant to the Best Available Technology (BAT) provisions of 25 Pa. Code Section 127.12(a)(5), the permittee shall not allow the emission of nitrogen oxides (NOx), carbon monoxide (CO), non-methane non-ethane hydrocarbon (NMNEHC), and total particulate matter (TPM) into the outdoor atmosphere from the each turbine in excess of the following limits:
- (1) 25 ppmvd NOx at 15% O2;
- (2) 25 ppmvd CO at 15% O2;
- (3) 9 ppmvd NMNEHC at 15% O2 (measured as propane); and
- (4) 0.03 lb TPMmmBTU.
- (b) The emission limitations specified in part (a), above, shall apply at all times except during the following periods:
- (1) Periods of start-up and shutdown, provided that the duration of start-up and shut-down do not exceed thirty (30) minutes per occurrence; and
 - (2) Periods of operation in subzero ambient temperature conditions (i.e., less than 0°F).

002 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

The permittee shall comply with all applicable Emission Limit requirements specified in 40 CFR Part 60 Subpart KKKK 60.4315 through 60.4330.

003 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

- a. Particulate 0.74 lbs/hr/turbine, (1.48 pounds per hour, total)
- b. Nitrogen Oxides (NOx) 4.45 lbs/hr/turbine (8.9 pounds per hour, total)
- c. Sulfur Dioxide (SO2) 2.82 lbs/hr/turbine (5.64 pounds per hour, total).
- d. Carbon Monoxide (CO) 2.71lbs/hr/turbine (5.42 pounds per hour, total).
- e. Volatile Organic Compounds (VOC) 0.31 lbs/hr/turbine (0.62 pounds per hour, total).
- f. Formaldehyde (HCHO) 0.04 lbs/hr/turbine (0.08 lbs/hr, total)
- g. Total HAPs 0.05 lbs/hr/turbine (0.10 lbs/hr, total)

These emission limits do not apply during the startup and shutdown of the internal combustion engines. Each startup and shutdown period is limited to a maximum of 30 minutes each.

004 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

The permittee shall limit the emissions from the turbines at the facility during any consecutive 12-month period to the following:

- a. Particulate 6.22 tons/year.
- b. Nitrogen Oxides (NOx) as NO2 39.44 tons/year.
- c. Sulfur Dioxide (SOx) 0.30 tons/year.
- d. Carbon Monoxide (CO) 48.50 tons/year.
- e. Volatile Organic Compounds (VOC) 2.98 tons/year.
- f. Formaldehyde (HCHO) 0.30 tons/year.





g. Hazardous Air Pollutants (Combined HAPS) - 0.42 tons/year.

005 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

No person may permit the emission into the outdoor atmosphere of sulfur oxides from a source in a manner that the concentration of the sulfur oxides, expressed as SO2, in the effluent gas exceeds 500 ppmvd.

(The Permittee may choose to comply with this requirement by using only pipeline quality natural gas. Upon Department request, the Permittee shall obtain a certification of fuel sulfur content from the supplier, provide fuel analysis or fuel samples of fuel used, and/or provide a copy of the FERC tariff sheet in order to show that the fuel meets the requirements of:

(a) 0.25 grains of hydrogen sulfide (H2S) per 100 cubic feet of gas; and

(b) 2 grains of total sulfur per 100 cubic feet of gas.)

006 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

The company shall meet the following emission limitations during startup/shut down events.

Start-up:

NOx- 0.70 lb/each event

CO-64.40 lb/each event

VOC- 0.74 lb/each event,

Shut-Down:

NOx-0.30 lb/each event

CO- 30.20 lb/each event

VOC- 0.34 lb/each event.

(Event is define as 1 startup & 1 shut down)

Fuel Restriction(s).

007 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

The permittee shall only use pipeline quality natural gas as fuel in each turbine.

008 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

Pursuant to the 40 CFR Part 60, Subpart KKKK, combustion turbine shall primarily fire natural gas with sulfur content no greater than 20 grains/100 SCF.

II. TESTING REQUIREMENTS.

009 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

In addition to the initial source testing requirement, every 2,500 hours of operation and no sooner than forty-five (45) days from the previous test, the owner or operator shall perform periodic monitoring for NOx and CO emissions to verify continued compliance upon each of the respective turbines subject to the BAT. A Department-approved test that has been performed within 45 days prior to the scheduled periodic monitoring may be used in lieu of the periodic monitoring for that time period. A portable gas analyzer may be used to satisfy the requirements of this condition utilizing three test runs of twenty (20) minutes for each test run. The Department may alter the frequency of portable analyzer tests based on the test results. The frequency of portable gas analyzer tests

may be altered with written Departmental approval. The portable gas analyzer shall be used and maintained according to the manufacturer's specifications and the procedures specified in ASTM D 6522 or equivalent as approved by the





Department.

Within thirty (30) calendar days after the completion of periodic monitoring, the owner or operator shall submit the results to the appropriate DEP Regional Office. The Department reserves the right to require source tests in accordance with EPA reference methods should the data from the portable analyzer warrant such tests.

010 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

- (a) Within 180 days after the start- up of an air contamination source, the permittee shall develop a leak detection and repair (LDAR) program and perform LDAR monitoring.
- (b) The LDAR monitoring must be conducted on each pump, valve, relief valve, flange, connector, storage vessel/storage tank, open ended line and compressor seal, if applicable, in natural gas or hydrocarbon liquids service using an optical gas imaging camera such as a FLIR camera or a gas leak detector capable of reading methane concentrations in air of 0% to 5% with an accuracy of +/- 0.2%.
- (c) The permittee may request, in writing, the use of other leak detection monitoring devices, to be approved, in writing, by the Department. Such LDAR monitoring equipment shall be operated in accordance with manufacturer-recommended procedures and, where applicable, Method 21 specified in 40 CFR Part 60, Appendix A. Each LDAR monitoring device shall be calibrated before use on each day of its use by following the manufacturer-recommended procedures or the procedure set forth at Method 21 specified in 40 CFR Part 60, Appendix A.
- (d) Leak means:

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- i) Any emissions imaged by the optical gas instrument;
- ii) Indications of liquids dripping;
- iii) Indications by a sensor that a seal or barrier fluid system has failed;
- iv) Screening results using a gas leak detector exceeding 2.5% methane and/or 500 ppm of VOCs.
- (e) A release from any equipment or component designed by the manufacturer to protect the equipment, controller(s), safety of personnel, to prevent ground water contamination, to prevent gas migration, or an emergency situation is not considered a leak.
- (f) The permittee shall monitor each pump, valve, relief valve, flange, connector, storage vessel/storage tank, open ended line and compressor seal, if applicable, in natural gas or hydrocarbon liquids service at least annually.
- (g) Leaks shall be repaired no later than 15 calendar days after a leak is detected, unless facility shutdowns or ordering of replacement parts is necessary for repair of the leak(s).
- (h) A leak is considered repaired if it is adjusted or otherwise altered and one of the following can be demonstrated after such adjustment or alteration:
 - i) No detectable emissions consistent with EPA Method 21 specified in 40 CFR Part 60, Appendix A;
 - ii) A concentration of 2.5% methane or less using a gas leak detector and a VOC concentration of 500 ppm or less;
- iii) No visible leak image when using an optical gas imaging camera; if an optical gas imaging camera was originally used to detect the leak;
- iv) No bubbling at leak interface using a soap solution bubble test specified in EPA Method 21; or a procedure based on the formation of bubbles in a soap solution that is sprayed on a potential leak source may be used for those sources that do not have continuously moving parts and that do not have a surface temperature greater than the boiling point or less than the freezing point of the soap solution; or
 - v) Any other method approved, in writing, by the Department.
- (i) If a leak is not repaired within fifteen (15) days after it is detected, the leaking equipment or component must be listed on a Delay of Repair (DOR) List. The owner or operator must submit a written request to the appropriate regional office for an extension of the 15 day repair deadline. This includes extensions required due to facility shutdowns and/or the ordering of



replacement parts. The written request shall also include the reason(s) for the extension request and the schedule for completion of the repairs. The Department may grant an extension of the LDAR deadline based upon the written request.

- (j) The optical gas imaging camera or other Department-approved gas leak detection equipment shall be operated in accordance with manufacturer-recommended procedures. For the storage vessel, if applicable, any leak detection and repair must be performed in accordance with 40 CFR Part 60, Subpart OOOO.
- (k) The permittee shall, at a minimum, on a monthly basis perform audible, visual, and olfactory (AVO) inspections to detect leaks from the equipment listed above.

011 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

Actions Related to Noncompliance Demonstrated by a Stack Test:

- (a) If the results of a stack test, performed as required by this approval, exceed the level specified in any condition of this approval, the Permitee shall take appropriate corrective actions. Within 30 days of the Permitee receiving the stack test results, a written description of the corrective actions shall be submitted to the Department. The Permitee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. The Department shall notify the permittee within 30 days, if the corrective actions taken are deficient. Within 30 days of receipt of the notice of deficiency, the Permitee shall submit a description of additional corrective actions to the Department. The Department reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) If the results of the required stack test exceed any limit defined in this plan approval, the test was not performed in accordance with the stack test protocol or the source and/or air cleaning device was not operated in accordance with the plan approval, then another stack test shall be performed to determine compliance. Within 120 days of the Permitee receiving the original stack test results, a retest shall be performed. The Department may extend the retesting deadline if the Permitee demonstrates, to the Department's satisfaction, that retesting within 120 days is not practicable. Failure of the second test to demonstrate compliance with the limits in the plan approval, not performing the test in accordance with the stack test protocol or not operating the source and/or air cleaning device in accordance with the plan approval may be grounds for immediate revocation of the plan approval to operate the affected source.

012 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

The permittee shall comply with all applicable Performance Testing requirements specified in 40 CFR Part 60 Subpart KKKK 60.4400 through 60.4415.

013 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

- 1. Within 180 days of initial start-up, a stack test shall be performed in accordance with the provision of Chapter 139 of the Rules and Regulations of the Department of Environmental Protection & 40 CFR part 60, Subpart KKKK, to demonstrate the compliance with the emission limitations set by the conditions above for NOX, CO, VOC and PWPM10 emissions. The stack tests shall be performed while the aforementioned sources are operating at the maximum rated capacity as stated on the application. If testing is performed at a rate of less than full production, operation is restricted to the process-input rate of testing at such level until a subsequent compliance test is performed at a full production.
- 2. At least sixty (60) calendar days prior to commencing an emission testing program required by this permit, a test protocol shall be submitted to the Department's Division of Source Testing and Monitoring and the Regional Office for review and approval. The test protocol shall meet all applicable requirements specified in the most current version of the Department's Source Testing Manual.
- 3. At least fifteen (15) calendar days prior to commencing an emission testing program required by this permit, written notification of the date and time of testing shall be provided to the Department's appropriate Regional Office. Written notification shall also be sent to the Department's Bureau of Air Quality, Division of Source Testing and Monitoring. The notification shall not be made without prior receipt of a protocol acceptance letter from the Department. The Department is under no obligation to accept the results of any testing performed without adequate advance written notice to the Department of such testing. In addition, the emissions testing shall not commence prior to receipt of a protocol acceptance letter from the Department.





- 4. A complete test report shall be submitted to the Department no later than sixty (60) calendar days after completion of the on-site testing portion of an emission test program.
- 5. A complete test report shall include a summary of the emission results on the first page of the report indicating if each pollutant measured is within permitted limits and a statement of compliance or non-compliance with all applicable permit conditions. The summary results will include, at a minimum, the following information:
- a. A statement that the owner or operator has reviewed the report from the emissions testing body and agrees with the findings;
- b. Permit number(s) and condition(s) which are the basis for the evaluation;
- c. Summary of results with respect to each applicable permit condition; and
- d. Statement of compliance or non-compliance with each applicable permit condition.

III. MONITORING REQUIREMENTS.

014 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

Pursuant to best available technology requirements of 25 Pa. Code Sections 127.1 and 127.12, the turbine shall be equipped, prior to initial start-up, with instrumentation to continuously monitor manufacturer's recommended, operational parameters which will indicate whether the turbine is operating in a low-NOx (SoLoNOx) mode.

015 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

The turbine combustion temperature and gas producer speed of the Taurus turbine shall be continuously monitored.

016 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

- (a) Beginning on the start-up date of source(s), the permittee shall conduct monthly walk-around inspections during daylight hours and while the facility is operating. Monthly inspections are performed to detect for: (1) the presence of visible emissions; (2) the presence of visible fugitive air contaminants; (3) the presence of audible fugitive air contaminants; (4) the presence of malodors beyond the boundaries of the facility.
- (b) The detected visible emissions and, audible or olfactible fugitive air contaminants shall be repaired no later than 15 calendar days after a leak is detected.

017 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

The permittee shall comply with all applicable Monitoring requirements specified in 40 CFR Part 60 Subpart KKKK 60.4335 through 60.4370.

018 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

A continuous monitoring system shall be installed and operated to monitor and record the fuel consumption for each turbine. This system shall be accurate to within plus or minus 5 percent.

019 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

The company shall obtain the fuel quality characteristics in a current, valid purchase contract, tariff sheet or transportation contract for the fuel, specifying that the maximum total sulfur content for natural gas use is 20 grains of sulfur or less per 100 standard cubic feet, has potential sulfur emissions of less than less than 26 ng SO2/J (0.060 lb SO2/MMBtu) heat input.

IV. RECORDKEEPING REQUIREMENTS.

020 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

(a) The owner or operator shall maintain a log for the results of each monthly AVO inspections, including date of each inspection performance and the name of the company representative performing the inspection.



- (b) The permittee shall maintain all LDAR monitoring data, including calibration data, identification of leaking components, date of leak discovery, date of each attempted repair and date of final repair.
- (c) All information generated to satisfy this recordkeeping condition shall be kept for a minimum of 5 years and shall be made available to the Department upon request.

021 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

- 1. The company shall maintain a file containing all records and other data that are required to be collected pursuant to the various provisions of this plan approval. The file shall include, but not be limited to: all air pollution control systems performance evaluations and records of calibration checks, adjustments and maintenance performed on all equipment which is subject to this plan approval. All measurements, records and other data required to be maintained by the company shall be retained for at least five years following the date on which such measurements, records or data are recorded.
- 2. The company shall maintain following records:
- (a) Data which clearly demonstrates that the heat input of the turbine never exceeds its rated capacity.
- (b) The records shall provide sufficient data to clearly demonstrate that the requirement of plan approval conditions are met.
- (c) Monthly hours of operation of turbine in each operating mode including normal, sub-zero temperature, low-load (<50%), and start-up and shutdown periods for the turbine.
- (d) Monthly fuel consumption rate and 12-month rolling total fuel consumption, total heat input for the combustion turbine.

022 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

- (a) The permittee shall maintain such records, including computerized records, as may be necessary to comply with 25 Pa. Code §§135.3 and 135.21. These may include records of production, fuel usage, equipment maintenance or other information determined by the Department to be necessary for identification and quantification of air contaminant emissions.
- (b) Any records maintained pursuant to this condition shall be retained for at least five (5) years and shall be made available to the Department upon request.

023 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

The permittee shall record the following:

- a. Monthly amount of fuel fired in the turbines.
- b. 12-month rolling total amount of fuel fired in the turbines.
- c. Monthly hours of operation.
- d. Monthly emissions of particulate, NOx, SOx, CO, VOC, Formaldehyde and HAPs.
- e. 12-month rolling total emissions of particulate, NOx, SOx, CO, VOC, Formaldehyde and HAPs.

024 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

The permittee shall record each start-up, shutdown and malfunction of the turbines. The records shall include the date, time, duration and type of event.

Note: "Malfunction" means any sudden, infrequent, and not reasonably preventable failure of air pollution control equipment, process equipment, or a process to operate in a normal or usual manner which causes, or has the potential to cause, the emission limitations in an applicable standard to be exceeded. Failures that are caused in part by poor maintenance or careless operation are not malfunctions.

025 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

The permittee shall calculate the emissions from the engines using the rates found in the application, or as approved by

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SECTION E. Source Group Plan Approval Restrictions.

the Department. The emission rates may be reviewed after results of testing are approved by the Department. Emission rates from approved test results shall be used to calculate emissions once approved.

026 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

The permittee shall keep records of the appropriate operational parameters for the turbine which will indicate low-NOx (SoLoNOx) mode operation.

V. REPORTING REQUIREMENTS.

027 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

The permittee shall comply with all applicable Reporting requirements specified in 40 CFR Part 60 Subpart KKKK 60.4375 through 60.4395.

VI. WORK PRACTICE REQUIREMENTS.

028 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

The permittee shall not, at any time, operate any turbine without the simultaneous operation of the turbine's respective SoLoNOx system except operating turbine during sub-zero temperature operation, low-load (<50%) operation, and startup and shutdown events..

029 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

Pursuant to the Best Available Technology (BAT) provisions of 25 Pa. Code Section 127.12(a)(5), the turbine's shall be:

- (a) Constructed, operated and maintained in accordance with the manufacturer's specifications.
- (b) Operated in a manner consistent with good air pollution control practices for minimizing emissions at all times, including periods of startup, shutdown and malfunction.

030 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

The company shall perform adjustment and/or tune-up on the combustion process as per manufacturer specifications. The source shall be operated and maintained in accordance with the manufacturers specification and with good air pollution control practices.

031 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

The combustion turbine shall employ a lean-premixed dry low emissions system (SoLoNOX) to control NOx emissions.

VII. ADDITIONAL REQUIREMENTS.

032 [25 Pa. Code §127.12b]

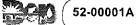
Plan approval terms and conditions.

Each turbine shall be equipped with non-resettable hour meters or an equivalent method of tracking the hours of operation approved by the Department..

033 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

The permittee shall comply with all applicable General Compliance requirements specified in 40 CFR Part 60 Subpart KKKK 60.4333.



COLUMBIA GAS TRANS CORP/MILFORD COMP STA



SECTION F. Alternative Operation Requirements.

No Alternative Operations exist for this Plan Approval facility.



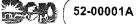
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SECTION G. Emission Restriction Summary.

No emission restrictions listed in this section of the permit.

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COLUMBIA GAS TRANS CORP/MILFORD COMP STA



SECTION H. Miscellaneous.

The following sources of minor significance have been exempted from permitting:

- one (1) natural gas fired line leater having a maximum rated heat input capacity of 1.25 MMBtu/hr
- Twelve (12) natural gas fired space heaters each having a maximum rated heat input capacity of 0.06 MMBtu/hr
- one (1) 1,000 gallon wastewater tank
- one (1) 2,000 gallon condensate tank

(Any emissions from exempt sources at the facility shall be identified and included in the facilities emission totals)



End of Report