



GROUP AGAINST SMOG & POLLUTION

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August 26, 2013

VIA EMAIL AND FIRST CLASS MAIL

Alexander Sandy
Pennsylvania Department of Environmental Protection
400 Waterfront Drive
Pittsburgh, PA, 15222
asandy@pa.gov

**Re: Group Against Smog and Pollution Comments Regarding Plan Approval 32-00411
- Mountain Gathering, LLC, Homer City PP Compressor Station**

Dear Mr. Sandy,

Please accept these comments regarding Plan Approval 32-00411 for the Mountain Gathering, LLC, Homer City PP Compressor Station, noticed on July 27, 2013 (43 Pa.B. 4218).

If you have any questions or require additional information, please feel free to contact me.

Sincerely,


Joe Osborne
Legal Director

**GROUP AGAINST SMOG AND POLLUTION (GASP) COMMENTS REGARDING
PLAN APPROVAL 32-00411 - MOUNTAIN GATHERING, LLC, HOMER CITY PP
COMPRESSOR STATION**

I. The Department has failed to properly calculate potential to emit for the G3606 engines

According to the draft plan approval, the Homer City facility would operate 4 Caterpillar G3606 LE engines “controlled by an Emit Technologies Model No. RQ-3621-Z oxidation catalyst.”¹ The Department assumes the VOC/NMNEHC and HCHO PTE for these engines will match the General Permit 5 (GP-5) PTE for lean burn engines >500 HP (i.e. 0.25 and 0.05 g/bhp-hr respectively).² However, the control efficiencies listed on the vendor specification sheet for the Emit Technologies RQ-3621-Z catalysts are insufficient to meet the GP-5 NMNEHC and HCHO emission limits.

	engine pre-catalyst emissions	catalyst control efficiency	post-catalyst emissions	GP-5 emission limits
NMNEHC	0.63	50%	0.32	0.25
HCHO	0.26	76%	0.06	0.05

Pennsylvania regulations define potential to emit as “The maximum capacity of a source to emit a pollutant under its physical and operational design. Any physical or operational limitation on the capacity of the source to emit a pollutant, including air pollution control equipment and limitations on hours of operation or on the type or amount of material combusted, stored or processed shall be treated as part of the design if the limitation or the effect it would have on emissions is Federally enforceable or legally and practicably enforceable by an operating permit condition.”³

Numerical limits on potential to emit are not enforceable per se. In order to be federally enforceable, a PTE limit must either:

- (1) reflect maximum emissions of the source operating at full capacity, or
- (2) be based on production limits or operational limits (e.g., hours of operation, fuel restrictions, pollution control requirements) sufficient to ensure the source will not exceed the numerical emission limit.⁴

¹ PADEP, Draft Plan Approval 32-00411 - Mountain Gathering, Homer City PP Compressor Station (Jul. 18, 2013) Condition C #017 at p. 15.

² *Id.* Condition E #001 at p. 24.

³ 25 Pa. Code § 121.1.

⁴ U.S. EPA, Limiting Potential to Emit (PTE) in New Source Review (NSR) Permitting *available at* <http://www.epa.gov/reg3artrd/permitting/limitPTEmmo.htm>; *see also U.S. v. Louisiana-Pacific Corp.*, 682 F. Supp. 1122 (D. Colo. Oct. 30, 1987) & 682 F. Supp. 1141 (D. Colo. Mar. 22, 1988).

The g/bhp-hr engine emission limits for VOC and HCHO listed in plan approval Condition E #001 do not reflect maximum emissions of the facility operating at full capacity, are not based on a production or operational limit, and are not based on emissions reductions provided by a pollution control device; therefore they do not constitute effective limits on potential to emit. As discussed in the following sections, the Department must require Mountain Gathering to achieve greater emissions reductions in order to meet a sufficiently low VOC and HCHO PTE to satisfy the Pennsylvania BAT requirement.

II. Mountain Gathering has failed to satisfy the best available technology (BAT) requirement for NMNEHC and HCHO

Plan approval applicants must “[s]how that the emissions from a new source will be the minimum attainable through the use of the best available technology.”⁵ Clearly, Mountain Gathering has failed to satisfy the BAT requirement for NMNEHC and HCHO emissions from natural gas fired lean burn engines >500 HP because the properly calculated NMNEHC and HCHO emission rates exceed for the Homer City facility exceed GP-5 BAT.

Further, even if the Homer City emission rates met the GP-5 BAT limits, this would not be sufficient to satisfy the BAT requirement for individual plan approvals under 25 Pa. Code Ch. 127 Subchapter B. Past DEP BAT determinations for Caterpillar G3606 LE engines permitted under individual plan approvals have included lower NMNEHC and HCHO limits. For example, the Department determined BAT for identical Caterpillar G3606 LE engines installed at the Appalachia Midstream Services, LLC Granville #2 Compressor Station was 0.13 g/bhp-hr for VOC and 0.04 g/bhp-hr for HCHO.⁶ Mountain Gathering must meet the same or lower emission rates at the Homer City facility.

III. Typographical errors in the draft plan approval and review memo

The Department’s plan approval and review memo repeatedly refer to the Caterpillar G3606 LE engines as “G3306” engines. To avoid confusion, these typographical errors should be corrected in the final documents.

⁵ 25 Pa. Code § 127.12(a)(5).

⁶ Attachment 1 – PADEP, Review Memo for Plan Approval 08-00031B, Appalachia Midstream Services, LLC Granville #2 Compressor Station (Jun. 27, 2011) at p. 3.