

Commonwealth of Pennsylvania
Department of Environmental Protection
July 20, 2007

SUBJECT: Review of Title V Application
Title V Operating Permit
Texas Eastern Gas Transmission Corp.
Lilly Station
Cresson Township, Cambria County

TO: Air Quality Permit File: 11-00258

THRU: Barbara Hatch, P.E. *BHA*
Facilities Permitting Chief
Air Quality Control

FROM: Francis Condrick *FAC*
Air Control Engineer

BACKGROUND:

Texas Eastern Gas Transmission Corporation operates facilities in southwestern PA used for the production, storage, and distribution of natural gas. Normal operation of the Lilly Station involves various sources of air contaminants. As a result of the levels of NOx emitted, Lilly is a major stationary source as defined in Title I, Part D of the Clean Air Act Amendments.

The Title V Renewal application was submitted to the Department on Dec. 17, 2001 and an updated compliance history was received on April 15, 2002. The application was deemed timely and administratively complete on June 4, 2002. An application shield, as described in 25 PA Code §127.505(e), was granted at that time.

No new equipment has been added to this site since the initial Title V has been issued in 1997.

Regulatory Analysis and Equipment:

The Lilly Compressor Station consists of four natural gas fired turbines. Sources 102 and 103 are Westinghouse Model W-52 simple cycle engines rated at 5,000 horsepower, source 104 is a G.E. gas turbine rated at 19,800 horsepower, and source 105 is a Dresser Rand DC 990 simple cycle turbine rated at 5,000 horsepower. There are no

glycol dehydration units at this station. This facility is not a major source of HAP's and is not subject to either 40 CFR Part Subpart HH or Subpart HHH.

The Dresser Clark DC-990 is the only turbine subject to 40 CFR, Subpart GG- Standards of Performance for Stationary Gas Turbines because the other turbines were installed prior to October 3, 1977. Subpart GG establishes NOx and SO2 emission limitations, monitoring, testing, recordkeeping and reporting requirements.

Since none of these sources are equipped with control devices, the compliance assurance monitoring (CAM) provisions of 40 CFR 64 do not apply.

Operational Flexibility:

The owner/operator has not taken any restrictions on the sources at this site and wishes to operate continuously if needed. No alternative operating scenarios were proposed.

Conclusions and Recommendations:

I have completed my review of Texas Eastern (TE) Transmission Corporation's Title V permit application for their Lilly Station. TE has met the regulatory requirements associated with the application submittal. The attached draft permit reflects terms and conditions as described in the permit application. It is my recommendation to issue a Title V Permit for this facility.