



State of New Jersey

Governor  
CHRIS CHRISTIE

DEPARTMENT of ENVIRONMENTAL PROTECTION

Commissioner  
BOB MARTIN

KIM GUADAGNO  
Lt. Governor

Division of Air Quality  
Bureau of Air Permits  
401 E. State Street, 2<sup>nd</sup> floor, P.O. Box 420, Mail Code 401-02  
Trenton, NJ 08625-0420

CERTIFIED MAIL

Mr. Michael Callegari, Manager  
Transcontinental Gas Pipelines Corp., LNG Station 240  
2800 Post Oak Blvd  
HOUSTON, TX 77056

**SUBJECT: Alternative Emission Limit (AEL) for oxides of nitrogen (NOx) Pursuant to N.J.A.C. 7:27-19.13 and Significant Modification of Operating Permit**

**NAME:** Transcontinental Gas Pipelines Corp., LNG Station 240

**FACILITY LOCATION:** Transcontinental Gas Pipelines Corp., LNG Station 240  
718 Paterson Plank Road  
Carlstadt Borough  
Bergen County

**PROGRAM INTEREST NO.:** 02626

**PERMIT ACTIVITY NO.:** BOP090001

**SOURCE DESCRIPTION:** Four (4), 83.8 MMBtu/hr, Natural Gas-fired water bath heaters

**APPROVAL DATE:** June 12, 2014

Dear Mr. Callegari:

The New Jersey Department of Environmental Protection (Department) has reviewed Transcontinental Gas Pipelines Corp., LNG Station 240 's (Transco-240) application dated March 21, 2011, proposing alternate maximum emission limit (AEL) for NO<sub>x</sub>, in which Transco-240 requested AELs for the four (4) natural gas-fired 83.8 MMBTU/hr water bath heaters (E7, E8, E9 and E10). These sources cannot demonstrate compliance with the NO<sub>x</sub> RACT limit of 0.05 lb/MMBTU. Transco-240 is proposing NO<sub>x</sub> AEL limits of 0.1 lb/MMBTU for the four water bath heaters. Transco-240 has proposed to limit the annual operating hours to 1600 hours operational cap for all four units combined and not operate the subject heaters during ozone season.

On the basis of all the information available to the Department in reference to these NO<sub>x</sub> limits, the Department has determined that the proposed AEL satisfies the requirements of the New Jersey Air Pollution Regulations codified at N.J.A.C. 7:27-19.13. Therefore, the Department concludes that the AEL is justified for these water bath heaters. Accordingly, the Department hereby approves this AEL with the attached conditions.

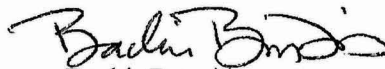
Compliance with the attached conditions (Attachment I), effective on the approval date and continuing thereafter, will satisfy the current requirements of N.J.A.C. 7:27-19, for attainment of the eight-hour ozone standard, for each of the four water bath heater at Transco-240. The NO<sub>x</sub> AEL limit of 0.1 lb/MMBTU for each water bath heater under this application will not take effect until after EPA approves NJDEP's SIP revision for the four water bath heaters.

If in your judgement as an applicant for a AEL, the Department is imposing any unreasonable condition of approval, you may contest the Department's decision and request a contested case hearing pursuant to the Administrative Procedures Act, N.J.S.A. 52:14B-1 et seq., and the New Jersey Administrative Code at N.J.A.C. 1:1 and 7:27-8.12. All requests for a contested case hearing must be received in writing by the Department within (20) calendar days from the date of receipt of this approval, and must contain the information specified in the Administrative Hearing Request Checklist and Tracking Form (Attachment II).

Please note that all conditions of the existing Title V Operating Permit for the facility remain unchanged, with the exception of the changes specified in Attachment I. The conditions will be included in the Title V Operating Permit (BOP090001) when it is approved.

If you have any questions on this matter, please call Kevin Greener of my staff at (609) 984-3696.

Sincerely,



Bachir Bouzid

Section Chief, Operating Permits

Bureau of Air Permits

Attachments

C: William O'Sullivan, Director, AQPP  
Francis Steitz, Assistant Director, AQPP  
Richard Ruvo, USEPA Region II  
R. Jones, NRO  
K. Greener, BAP

**ATTACHMENT I**

CONDITIONS OF APPROVAL  
ALTERNATIVE EMISSION LIMIT FOR NO<sub>x</sub>

FOR

FOUR (4) WATER BATH HEATERS

TRANSCONTINENTAL GAS PIPELINES CORP., LNG STATION 240  
718 PATERSON PLANK ROAD  
CARLSTADT BOROUGH

PROGRAM INTEREST NO. 02626

APPROVAL DATE: June 12, 2014

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**I. DEFINITIONS:**

**The Department:** New Jersey Department of Environmental Protection

**BAP:** Bureau of Air Permits  
NJ Department of Environmental Protection  
P.O. Box 420, Mail Code 401-02  
Trenton, NJ 08625-0420

**BTS:** Bureau of Technical Services  
NJ Department of Environmental Protection  
PO Box 420, Mail Code: 380-01A  
Trenton, NJ 08625-0420

**Regional Enforcement Office:**

**NRO:** Northern Regional Air Pollution Control Office  
NJ Department of Environmental Protection  
Bureau of Enforcement Operations  
7 Ridgedale Avenue  
Cedar Knolls, NJ 07927

**Transco-240:** Transcontinental Gas Pipelines Corp., LNG Station 240  
718 Paterson Plank Road  
Carlstadt Borough  
Bergen County

## **II. CONDITIONS OF APPROVAL**

### **A. CONTROL FOR NITROGEN OXIDES REDUCTION**

1. Transco-240 shall operate the four (4) water bath heaters for a combined total of 1600 hours per year.
2. Transco-240 shall not operate the four (4) water bath heaters during the ozone season.
3. The flue gas recirculation (FGR) system shall operate at all times the heater is operating.

### **B. NO<sub>x</sub> EMISSION LIMITS**

#### **1. NO<sub>x</sub> Emission Limits**

(a) The emission rate of NO<sub>x</sub> from each water bath heater, while firing natural gas, shall not exceed 0.10 lb/MMBTU. The maximum allowable emission limit becomes effective on the effective date of EPA's approval, as published in the Federal Register, of NJDEP's SIP revision for the AEL. Until EPA's approval becomes effective, the maximum allowable emission rate for each water bath heater is 0.05 lb/MMBTU pursuant to N.J.A.C. 7:27-19.7(i)2.

(b) The total emission rate of NO<sub>x</sub> from all four water bath heaters, while combusting natural gas shall not exceed 6.7 tons per year

(c) Transco-240 shall limit the total hours of operation for the four water bath heaters to 1600 hours per year or less.

#### **2. Compliance Basis**

Compliance with the above NO<sub>x</sub> emission limits shall be determined by periodic emission monitoring during the combustion process adjustment, stack testing for NO<sub>x</sub> emissions once per operating permit term, and continuously monitoring the annual hours of operation.

### **C. COMBUSTION PROCESS ADJUSTMENT**

Transco-240 shall inspect and adjust each heater's combustion process in accordance with the procedures set forth at N.J.A.C. 7:27-19.16(a), in the same quarter of each calendar year. The permittee shall ensure that the operating parameter settings are established and recorded after the combustion process is adjusted and that the adjusted equipment or source operation is maintained to operate consistent with the annual adjustment. An exceedance of an emission limit, which occurs during an adjustment of the combustion process, as a result of the adjustment, is not a violation of this permit. Before the combustion process adjustment begins, and after it has been completed, the maximum emission rate of

NO<sub>x</sub> shall not exceed the maximum allowable emission rate specified in this approval.

#### **D. ADDITIONAL EMISSIONS TESTING AND MONITORING**

Stack emission testing on each water bath heater for NO<sub>x</sub>, CO, and VOC every 5 years. Natural gas usage shall be monitored continuously for each of the four water bath heater.

#### **E. RECORDKEEPING**

1. For each adjustment of the combustion process specified in Condition II.C of this approval, the following information shall be recorded
  - a) The date of the adjustment and the times at which it began and ended;
  - b) The name, title and affiliation of the person who made the adjustment;
  - c) The NO<sub>x</sub> and CO concentrations in the effluent stream, in ppmvd, before and after each actual adjustment was made;
  - d) The concentration of O<sub>2</sub> (in percent dry basis) at which the CO and NO<sub>x</sub> concentrations were measured pursuant to [N.J.A.C. 7:27-19.6(a)5];
  - e) A description of the corrective action taken place;
  - f) Results from any subsequent tests performed after taking any corrective action, including concentration and converted emission values in pounds per million BTU (lb/ MMBTU);
  - g) The type and the amount of fuel used over the 12 months prior to the annual adjustment; and
  - h) Any other information which the Department or the EPA has required as a condition of approval of any permit or certificate issued for the equipment or source operation.
2. The hours of operation shall be recorded manually or in a computer data base each quarter.
3. The annual fuel usage shall be recorded manually or in a computer data base each month.
4. The records required to be kept as part of this approval shall be entered in a log book, or in readily accessible computer memories, or by other method acceptable to the NRO, maintained on-site for a minimum of five (5) years from the date on which the record was made, and shall be made available to representatives of the Department upon request.



## **F. REPORTING**

1. For each adjustment of the combustion process specified in Condition II.C of this approval, the following information shall be reported in accordance with N.J.A.C. 7:27-19.16 (c) and (d).
  - a) The concentration of NO<sub>x</sub> and CO in the effluent stream in ppmvd, and O<sub>2</sub>, in percent dry basis, measured before and after the adjustment of the combustion process;
  - b) The converted emission values in lb/MMBTU for the measurements taken before and after the adjustment of the combustion process;
  - c) A description of any corrective action taken as part of the combustion adjustment; and
  - d) The type and amount of fuel used over the 12 months prior to the annual adjustment.

## **G. REVISION OF THE STATE IMPLEMENTATION PLAN (SIP)**

Pursuant to N.J.A.C. 7:27-19.13(h), a revision to the State Implementation Plan (SIP) for ozone to include this alternative emission limit will be submitted to the USEPA for approval. The USEPA will review the alternative emission limit, propose action on the SIP revision and finalize its action after public comment. Denial of the SIP revision by the USEPA will cause the alternative maximum NO<sub>x</sub> emission rate to be revoked and will result in modification of the alternative emission limit and the facility operating permit.

## **H. MODIFICATION OF AEL**

1. Approval of an amended AEL will be required by the Department before any alterations can be made to one of the four (4) water bath heaters which will cause NO<sub>x</sub> emission rates to increase above the limits specified in Condition II.B of this approval.
2. In the event that the NO<sub>x</sub> RACT limit specified in N.J.A.C. 7:27-19.7(i) is revised, through an amendment to N.J.A.C. 7:27-19, Transco-240 must comply with the revised regulation. Compliance with the revised regulation through an AEL will require approval of an amended AEL.

