Facility Name: **Transcontinental Gas Pipe Line Company, LLC – Compressor Station 130**
City: Comer
County: Madison
AIRS #: 04-13-195-00015

Application #: TV-690292
Date Application Received: September 1, 2022
Permit No: 4922-195-0015-V-05-0

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Introduction

This narrative is being provided to assist the reader in understanding the content of referenced operating permit. Complex issues and unusual items are explained here in simpler terms and/or greater detail than is sometimes possible in the actual permit. The permit is being issued pursuant to: (1) Georgia Air Quality Act, O.C.G.A § 12-9-1, et seq. and (2) Georgia Rules for Air Quality Control, Chapter 391-3-1, and (3) Title V of the Clean Air Act. Section 391-3-1-.03(10) of the Georgia Rules for Air Quality Control incorporates requirements of Part 70 of Title 40 of the Code of Federal Regulations promulgated pursuant to the Federal Clean Air Act. The narrative is intended as an adjunct for the reviewer and to provide information only. It has no legal standing. Any revisions made to the permit in response to comments received during the public participation and EPA review process will be described in an addendum to this narrative.

I. Facility Description

A. Facility Identification

1. Facility Name: Transcontinental Gas Pipe Line Company, LLC – Compressor Station 130

2. Parent/Holding Company Name

The Williams Companies, Incorporated

3. Previous and/or Other Name(s)

Transco Compressor Station 130
Transcontinental Gas Pipe Line Corporation – Station 130

4. Facility Location

117 Winns Lake Road, Comer, Georgia 30639

5. Attainment, Non-attainment Area Location, or Contributing Area

The facility is located in Madison County, which is in attainment for all criteria pollutants.

B. Site Determination

There are no other facilities which could possibly be contiguous or adjacent and under common control.

C. Existing Permits

Table 1 below lists all existing Title V permits, all amendments, 502(b)(10) changes, and off-permit changes, issued to the facility, based on a comparative review of form A.6, Existing Permits, of the Title V application and the "Permit" file(s) on the facility found in the Air Branch office.

Table 1: List of Existing Permits, Amendments, and Off-Permit Changes

Permit Number and/or Off-Permit Change	Date of Issuance/ Effectiveness	Purpose of Issuance
4922-195-0015-V-04-0	April 3, 2018	TV Renewal
Off Permit Change	February 7, 2022	Addition of an air compressor powered by an EPA-certified Tier 4f diesel engine
4922-195-0015-V-04-1	February 16, 2024	Changing Compressor Turbine 01 (Source Code: ML17) from new/reconstructed to modified.

D. Process Description

1. SIC Codes(s)

4922

The SIC Code(s) identified above were assigned by EPD's Air Protection Branch for purposes pursuant to the Georgia Air Quality Act and related administrative purposes only and are not intended to be used for any other purpose. Assignment of SIC Codes by EPD's Air Protection Branch for these purposes does not prohibit the facility from using these or different SIC Codes for other regulatory and non-regulatory purposes.

Should the reference(s) to SIC Code(s) in any narratives or narrative addendum previously issued for the Title V permit for this facility conflict with the revised language herein, the language herein shall control; provided, however, language in previously issued narratives that does not expressly reference SIC Code(s) shall not be affected.

2. Description of Product(s)

The facility is a natural gas compressor station. It does not make a product.

3. Overall Facility Process Description

Transcontinental Gas Pipe Line Company, LLC operates several compressor stations in North Georgia and adjacent states. These compressor stations, also referred to as pump stations or boost stations, are located along the Transco gas transmission line.

Transcontinental Gas Pipe Line Company, LLC – Compressor Station 130 has twenty-one internal combustion (IC) engines and two turbines. Natural gas enters the facility in pipelines. Compressors increase the pressure of the gas for transmission in the pipelines downstream of the compressor station. The mainline compressors are driven by the compressor engines (Source Codes: ML01 through ML16) and the compressor turbines (Source Codes: ML17 and ML18). Instrument and utility air is supplied by the air compressor engines (Source Codes: AC05 and AC08). Three 250 kW generator engines (Source Codes: AUX1 through AUX3) are used exclusively as emergency standby generators. All turbines and engines fire natural gas exclusively. All mainline compressor engines (Source Codes: ML01 through ML16) are spark ignition 2-stroke lean burn (2LSB) reciprocating internal combustion engines (RICE). The air compressor engines (Source Codes: AC05 and AC08) and the generator engines (Source Codes: AUX1 through AUX3) are spark ignition 4-stroke rich burn (4SRB) RICE.

4. Overall Process Flow Diagram

The facility provided a process flow diagram in their Title V permit application.

E. Regulatory Status

1. PSD/NSR

The facility is located in Madison County, an attainment area for all criteria pollutants.

The facility is a major source under PSD regulations because the potential-to-emit (PTE) for nitrogen oxides, carbon monoxide, and volatile organic compounds is greater than 250 tons per year (tpy) each. The facility is not one of the 28 named sourced categories under PSD regulations.

The majority of the equipment was installed prior to PSD applicability. Compressor Turbine 02 (Source Code: ML18) went through PSD review in 1993. The 90-tpy annual NO_X emission cap and natural gas only are the only remaining BACT limits of the 1993 PSD Review

2. Title V Major Source Status by Pollutant

Table 2: Title V Major Source Status

Pollutant	Is the Pollutant Emitted?	If emitted, what is the facility's Title V status for the pollutant?		
		Major Source Status	Major Source Requesting SM Status	Non-Major Source Status
PM	✓			✓
PM_{10}	✓			✓
$PM_{2.5}$	✓			✓
SO_2	✓			✓
VOC	✓	✓		
NO_x	✓	✓		
CO	✓	✓		
TRS	✓			✓
H_2S	✓			✓
Individual HAP	✓	✓		
Total HAPs	✓	✓		

3. MACT Standards

The facility is a major source for single HAP and total HAPs.

4. Program Applicability (AIRS Program Codes)

Program Code	Applicable (y/n)
Program Code 6 - PSD	Yes
Program Code 8 – Part 61 NESHAP	No
Program Code 9 - NSPS	Yes
Program Code M – Part 63 NESHAP	Yes
Program Code V – Title V	Yes

Regulatory Analysis

II. Facility Wide Requirements

A. Emission and Operating Caps:

None applicable.

B. Applicable Rules and Regulations

Not applicable.

C. Compliance Status

The Title V permit application contained no indication of any non-compliance known by the company.

D. Permit Conditions

None applicable.

III. Regulated Equipment Requirements

A. Equipment List for the Process

Emission Units		Applicable Requirements/Standards	Air Pollution Control Devices	
ID No.	Description		ID No.	Description
ML01	Compressor Engine 01 2 Stroke Lean Burn Spark Ignition Engine 2,050 HP Installed in 1950	40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ 391-3-1-.02(2)(b) 391-3-1-.02(2)(g)	None	None
ML02	Compressor Engine 02 2 Stroke Lean Burn Spark Ignition Engine 2,050 HP Installed in 1950	40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ 391-3-1-.02(2)(b) 391-3-1-.02(2)(g)	None	None
ML03	Compressor Engine 03 2 Stroke Lean Burn Spark Ignition Engine 2,050 HP Installed in 1950	40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ 391-3-1-.02(2)(b) 391-3-1-.02(2)(g)	None	None
ML04	Compressor Engine 04 2 Stroke Lean Burn Spark Ignition Engine 2,050 HP Installed in 1951	40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ 391-3-1-.02(2)(b) 391-3-1-.02(2)(g)	None	None
ML05	Compressor Engine 05 2 Stroke Lean Burn Spark Ignition Engine 2,050 HP Installed in 1951	40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ 391-3-1-.02(2)(b) 391-3-1-.02(2)(g)	None	None
ML06	Compressor Engine 06 2 Stroke Lean Burn Spark Ignition Engine 2,050 HP Installed in 1951	40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ 391-3-1-.02(2)(b) 391-3-1-.02(2)(g)	None	None
ML07	Compressor Engine 07 2 Stroke Lean Burn Spark Ignition Engine 2,050 HP Installed in 1951	40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ 391-3-1-.02(2)(b) 391-3-1-.02(2)(g)	None	None
ML08	Compressor Engine 08 2 Stroke Lean Burn Spark Ignition Engine 2,050 HP Installed in 1951	40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ 391-3-1-.02(2)(b) 391-3-1-.02(2)(g)	None	None
ML09	Compressor Engine 09 2 Stroke Lean Burn Spark Ignition Engine 2,050 HP Installed in 1951	40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ 391-3-1-.02(2)(b) 391-3-1-.02(2)(g)	None	None

Emission Units		Applicable Requirements/Standards	Air Pollution Control Devices	
ID No.	Description		ID No.	Description
ML10	Compressor Engine 10 2 Stroke Lean Burn Spark Ignition Engine 2,050 HP Installed in 1958	40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ 391-3-1-.02(2)(b) 391-3-1-.02(2)(g)	None	None
ML11	Compressor Engine 11 2 Stroke Lean Burn Spark Ignition Engine 2,050 HP Installed in 1959	40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ 391-3-1-.02(2)(b) 391-3-1-.02(2)(g)	None	None
ML12	Compressor Engine 12 2 Stroke Lean Burn Spark Ignition Engine 2,050 HP Installed in 1962	40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ 391-3-1-.02(2)(b) 391-3-1-.02(2)(g)	None	None
ML13	Compressor Engine 13 2 Stroke Lean Burn Spark Ignition Engine 2,050 HP Installed in 1962	40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ 391-3-1-.02(2)(b) 391-3-1-.02(2)(g)	None	None
ML14	Compressor Engine 14 2 Stroke Lean Burn Spark Ignition Engine 2,050 HP Installed in 1968	40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ 391-3-1-.02(2)(b) 391-3-1-.02(2)(g)	None	None
ML15	Compressor Engine 15 2 Stroke Lean Burn Spark Ignition Engine 2,050 HP Installed in 1969	40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ 391-3-1-.02(2)(b) 391-3-1-.02(2)(g)	None	None
ML16	Compressor Engine 16 2 Stroke Lean Burn Spark Ignition Engine 2,050 HP Installed in 1971	40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ 391-3-1-.02(2)(b) 391-3-1-.02(2)(g)	None	None
ML17	Compressor Turbine 01 Solar Centaur 40-4500S 42.12 MMBtu/hr Installed in 1980 Modified in 2013	40 CFR 60 Subpart A 40 CFR 60 Subpart KKKK 40 CFR 63 Subpart A 40 CFR 63 Subpart YYYY 391-3-1-.02(2)(b) 391-3-1-.02(2)(g)	None	None
ML18	Compressor Turbine 02 Solar Mars 100-16000S 122.4 MMBtu/hr Installed in 1990	40 CFR 52.21 40 CFR 60 Subpart A 40 CFR 60 Subpart GG 40 CFR 63 Subpart A 40 CFR 63 Subpart YYYY 391-3-1-.02(2)(b) 391-3-1-.02(2)(g)	None	None
AUX1	Generator Engine 01 (Emergency Use Only) 4 Stroke Rich Burn Spark Ignition Engine 370 HP Installed in 1950	40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ 391-3-1-.02(2)(b) 391-3-1-.02(2)(g)	None	None

Emission Units		Applicable Requirements/Standards	Air Pollution Control Devices	
ID No.	Description		ID No.	Description
AUX2	Generator Engine 02 (Emergency Use Only) 4 Stroke Rich Burn Spark Ignition Engine 370 HP Installed in 1950	40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ 391-3-1-.02(2)(b) 391-3-1-.02(2)(g)	None	None
AUX3	Generator Engine 03 (Emergency Use Only) 4 Stroke Rich Burn Spark Ignition Engine 370 HP Installed in 1950	40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ 391-3-1-.02(2)(b) 391-3-1-.02(2)(g)	None	None
AC05	Air Compressor Engine 01 4 Stroke Rich Burn Spark Ignition Engine 256 HP Installed in 2013	40 CFR 60 Subpart A 40 CFR 60 Subpart JJJJ 40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ 391-3-1-.02(2)(b) 391-3-1-.02(2)(g)	NSCR	Non-Selective Catalytic Reduction
AC08	Air Compressor Engine 02 4 Stroke Rich Burn Spark Ignition Engine 256 HP Installed in 2015	40 CFR 60 Subpart A 40 CFR 60 Subpart JJJJ 40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ 391-3-1-.02(2)(b) 391-3-1-.02(2)(g)	NSCR	Non-Selective Catalytic Reduction

Compressor Turbine 01 (Source Code: ML17) was previously called Turbine T2. Compressor Turbine 02 (Source Code: ML18) previously had Source Code: G1. Changes are based on application and confirmed by email.

B. Equipment & Rule Applicability

Emission and Operating Caps:

Compressor Turbine 02 (Source Code: ML18) went through PSD review in 1993. PEMS requirements were replaced with annual performance testing and combustor outlets temperature monitoring requirements with Permit Amendment No. 4922-195-0015-V-03-2, issued June 13, 2013. The annual performance tests are required to establish a representative NO_X emission factor for the turbine. The 90-tpy annual NO_X emission cap for the turbine and natural gas only are the only remaining BACT limits of the 1993 PSD review.

Mainline Unit 17 (Source Code: ML17) had a PSD avoidance limit for NO_X in Permit No. 4922-195-0015-V-02-0, at the time with Source Code: T1. The turbine was decommissioned, and the limit removed in Permit No. 4922-195-0015-V-03-3, effective on November 7, 2013. The turbine was replaced with Turbine T2 (Source Code: T2). With App. #666064 dated June 14, 2022, the facility corrected that Turbine T1 was not decommissioned but modified, and the existing Turbine T2 is the modified T1. Permit Amendment No. 4922-195-0015-V-04-1 made this correction. With this application #690292, Turbine T2 was renamed Compressor Turbine 01 (Source Code: ML17) and is subject to the original PSD avoidance limit for NO_X.

Rules and Regulations Assessment:

40 CFR 60 Subpart GG – "Standards of Performance for Stationary Gas Turbines"

Applicable to Compressor Turbine 02 (Source Code: ML18)

This subpart applies to all stationary gas turbines with a heat input at peak load equal to or greater than 10 MMBtu/hr and constructed after October 3, 1977.

Compressor Turbine 02 is a stationary gas turbine with a heat input greater than 10 MMBtu/hr and was constructed after October 3, 1977, and thus is subject to this subpart. The unit has a NO_X emission limit of 198 ppmvd at 15% oxygen, using the equation provided in 60.332(a)(2). However, the annual NO_X BACT limit of 90 tpy is more stringent. The unit must not fire any fuel which contains total sulfur in excess of 0.8 percent by weight. Any fuel sulfur content analysis that is greater than 0.8 percent by weight is defined as an excess emission. Compressor Turbine 01 (Source Code: ML17) is a stationary gas turbine that was modified after February 18, 2005, and thus is subject to 40 CFR 60 Subpart KKKK. It is exempt from the requirements of this subpart.

40 CFR 60 Subpart JJJJ – "Standards of Performance for Stationary Spark Ignition Internal Combustion Engines"

Applicable to the air compressor engines (Source Codes: AC05 and AC08).

This subpart applies to stationary spark ignition (SI) internal combustion engines that commenced construction after June 12, 2006.

The air compressor engines were constructed after June 12, 2006; were manufactured after July 1, 2008; and have a maximum power less than 500 HP, and thus are subject to this subpart. Because the air compressor engines are 4SRB spark ignition engines with a rating greater than 100 HP, the units must meet the emission standards in Table 1 of this subpart. The compressor engines (Source Codes: ML01 through ML16) and the generator engines (Source Codes: AUX1 through AUX2) were constructed prior to June 12, 2006, and thus not subject to this subpart.

40 CFR 60 Subpart KKKK – "Standards of Performance for Stationary Combustion Turbines"

Applicable to Compressor Turbine 01 (Source Code: ML17).

This subpart applies to stationary combustion turbines that commenced construction, modification, or reconstruction after February 18, 2005.

Compressor Turbine 01 is a stationary combustion turbine that commenced construction, modification, or reconstruction after February 18, 2005, and thus is subject to this subpart. The turbine has a NO_X emission limit based on Table 1 and a SO_2 fuel limit, is required to conduct annual performance tests to demonstrate compliance, and to maintain records of fuel composition. Compressor Turbine 02 (Source Code: ML18) was not constructed, modified, or reconstructed after February 18, 2005, and thus is not subject to this subpart.

Note: Compressor Turbine 01, then named Turbine T2 (Source Code: T2), was considered subject to this subpart in Amendment 4922-195-0015-V-04-0 because the turbine was considered constructed in 2013. With the correction in 4922-195-0015-V-04-1 and because this subpart applies to construction and modification after February 18, 2005, the turbine continues to remain subject to this subpart. There was no change in conditions due to this correction.

40 CFR 63 Subpart YYYY – "National Emission Standards for Hazardous Air Pollutants for Stationary Combustion Turbines"

Applicable to Compressor Turbine 01 and 02 (Source Codes: ML17 and ML18).

This subpart applies to stationary combustion turbines located at major sources of HAP emissions.

Compressor Turbine 01 and 02 (Source Codes: ML17 and ML18) are stationary combustion turbines located at a major source of HAP emissions. Both compressor turbines are considered *existing* because they commenced construction or reconstruction before January 14, 2003. Existing stationary combustion turbines do not have to meet the requirements of this subpart.

Note: Compressor Turbine 01, then named Turbine T2 (Source Code: T2), was considered subject to this subpart in Amendment 4922-195-0015-V-04-0 but had no specific requirements because it was considered a *new lean premix gas-fired stationary combustion turbine*, which did not need to comply with any requirements of this subpart except for initial notification until EPA took final action to require compliance and publish a document in the Federal Register. With the correction in 4922-195-0015-V-04-1, the turbine is now considered *existing* with respect to this subpart and does not have to meet the requirements of this subpart. As a result, there are no changes in conditions due to this correction.

40 CFR 63 Subpart ZZZZ – "National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines"

Applicable to the compressor engines (Source Codes: ML01 through ML16), the generator engines (Source Codes: AUX1 through AUX3), and the air compressor engines (Source Codes: AC05 and AC08).

This subpart applies to stationary reciprocating internal combustion engines (RICE) located at major and area sources of HAP emissions.

The compressor engines, the generator engines, and the air compressor engines are RICE located at a major source of HAP emissions, and thus are subject to this subpart. The compressor engines are *existing* spark ignition 2 stroke lean burn (2SLB) stationary RICE with a rating of more than 500 HP and do not have to meet the requirements of this subpart. The generator engines are *existing* spark ignition 4SRB stationary RICE and are subject to the requirements of *emergency generators* of this subpart. The air compressor engines are *new* spark ignition 4SRB stationary RICE with a rating of less than or equal to 500 HP and fulfill the requirements of this subpart by meeting the requirements of 40 CFR 60 Subpart JJJJ.

Georgia Rule 391-3-1-.02(b) – "Visible Emissions"

Applicable to the compressor engines (Source Codes: ML01 through ML16), the compressor turbines (Source Codes: ML17 and ML18), the generator engines (Source Codes: AUX1 through AUX3), and the air compressor engines (Source Codes: AC05 and AC08).

This rule applies to all sources, except as provided in other more restrictive or specific rules. A 40% opacity limit is applicable.

Georgia Rule 391-3-1-.02(g) – "Sulfur Dioxide"

Applicable to the compressor engines (Source Codes: ML01 through ML16), the compressor turbines (Source Codes: ML17 and ML18), the generator engines (Source Codes: AUX1 through AUX3), and the air compressor engines (Source Codes: AC05 and AC08).

This rule applies to fuel-burning sources. The units have a fuel limit of 2.5 percent sulfur by weight limitation, unless a more stringent condition is applicable. The compressor turbines (Source Codes: ML17 and ML18) have more stringent fuel limitations based on 40 CFR 60 Subpart KKKK and GG, respectively.

Georgia Rule 391-3-1-.02(mmm) – "NO_X Emissions from Stationary Gas Turbines and Stationary Engines Used to Generate Electricity"

Applicable to the generator engines (Source Codes: AUX1 through AUX3).

This rule applies to stationary engines used to generate electricity in a listed county. The generator engines operate as emergency generators in Madison County, one of the listed counties, and thus are subject to this rule. In order to meet the definition of an emergency generator, the hours of operation limit is applicable. The compressor engines (Source Codes: ML01 through ML16), the compressor turbines (Source Codes: ML17 and ML18), and the air compressor engines (Source Codes: AC05 and AC08) are not used to generate electricity and thus are not subject to this subpart.

Georgia Rule 391-3-1-.02(nnn) – "NO_X Emissions from Large Stationary Gas Turbines"

Not Applicable.

This rule applies to stationary gas turbines with nameplate capacity greater than 15 megawatts located in a listed county.

The compressor turbines (Source Codes: ML17 and ML18) have capacities less than 15 MWe, and thus are not subject to this rule.

C. Permit Conditions

Condition 3.2.1 establishes the NO_X BACT limit of 90.0 tpy for Compressor Turbine 02 (Source Code: ML18). (Same in existing permit).

Condition 3.2.2 re-establishes a limit of 20.0 pounds per hour of NO_X for Compressor Turbine 01 (Source Code: ML17) for PSD Avoidance. This condition was previously removed when the turbine was considered decommissioned. Now that the status of the turbine is considered *modified*, the turbine is now subject to the limit again.

Condition 3.2.3 prohibits the firing of fuel other than natural gas in Compressor Turbine 02 (Source Code: ML18) per PSD review, subsuming the fuel sulfur content requirement of Georgia Rule (g). (Same in existing permit).

Condition 3.3.1 establishes the applicability of 40 CFR 60 Subpart A and Subpart GG to Compressor Turbine 02 (Source Code: ML18). (Similar to Condition 3.3.1 in existing permit).

Condition 3.3.2 prohibits the firing of fuel with sulfur in excess of 0.8 percent by weight in Compressor Turbine 02 (Source Code: ML18), per 40 CFR 60 Subpart GG. (Same in existing permit).

Condition 3.3.3 establishes the applicability of 40 CFR 60 Subpart A and Subpart JJJJ to the air compressor engines (Source Codes: AC05 and AC08). (Similar to Condition 3.3.10 in existing permit).

Condition 3.3.4 states the emission limitations of the air compressor engines (Source Codes: AC05 and AC08), per 40 CFR 60 Subpart JJJJ. (Same as Condition 3.3.11 in existing permit).

Condition 3.3.5 requires the maintenance and operation of the air compressor engines (Source Codes: AC05 and AC08) to minimize emissions, per 40 CFR 60 Subpart JJJJ. (Same as Condition 3.3.12 in existing permit).

Condition 3.3.6 requires the maintenance and operation of the AFR controller to minimize emissions for the air compressor engines (Source Codes: AC05 and AC08), per 40 CFR 60 Subpart JJJJ. (Similar to 3.3.13 in existing permit, AFR controllers on these units have been confirmed to be installed).

Condition 3.3.7 establishes the applicability of 40 CFR 60 Subpart A and Subpart KKKK to the operation of Compressor Turbine 01 (Source Code: ML17). (Same as Condition 3.3.14 in existing permit).

Condition 3.3.8 states the NO_X emission limit from Compressor Turbine 01 (Source Code: ML17), per 40 CFR 60 Subpart KKKK. (Same as Condition 3.3.15 in existing permit).

Condition 3.3.9 prohibits firing fuel which contains sulfur in excess of 26 ng SO_2/J in Compressor Turbine 01 (Source Code: ML17), per 40 CFR 60 Subpart KKKK. (Same as Condition 3.3.16 in existing permit).

Condition 3.3.10 requires the maintenance and operation of Compressor Turbine 01 (Source Code: ML17) to minimize emissions at all times, per 40 CFR 60 Subpart KKKK. (Similar to Condition 3.3.17 in existing permit).

Condition 3.3.11 establishes the applicability of 40 CFR 63 Subpart A and YYYY to the compressor turbines (Source Codes: ML17 and ML18). (Same as Condition 3.3.3 in existing permit).

Condition 3.3.12 establishes the applicability of 40 CFR 63 Subpart A and ZZZZ to the compressor engines (Source Codes: ML01 through ML16), the generator engines (Source Codes: AUX1 through AUX3), and the air compressor engines (Source Codes: AC05 and AC08). (Same as Condition 3.3.4 in existing permit).

Condition 3.3.13 sets the schedule for maintenance for the generator engines (Source Codes: AUX1 through AUX3), per 40 CFR 63 Subpart ZZZZ. (Same as Condition 3.3.5 in existing permit).

Condition 3.3.14 reinforces the applicability of 3.3.13 at all times, per 40 CFR 63 Subpart ZZZZ. (Similar to Condition 3.3.9 in existing permit).

Condition 3.3.15 requires the maintenance and operation of the generator engines (Source Codes: AUX1 through AUX3) to minimize emissions, per 40 CFR 63 Subpart ZZZZ. (Similar to Condition 3.3.6 in existing permit).

Condition 3.3.16 requires the Permittee to minimize time spent idle during starting up for the generator engines (Source Codes: AUX1 through AUX3), per 40 CFR 63 Subpart ZZZZ. (New to permit).

Condition 3.3.17 allows the utilization of an oil analysis program to extend the oil change requirements in Condition 3.3.13, which must be included in the maintenance plan in Condition 3.3.15), per 40 CFR 63 Subpart ZZZZ. (Similar to Condition 3.3.7 in existing permit).

Condition 3.3.18 limits the hours of operation of the generator engines (Source Codes: AUX1 through AUX3) in emergency and non-emergency use, per 40 CFR 63 Subpart ZZZZ. (Similar to Condition 3.3.8 in existing permit).

Condition 3.4.1 limits visible emission with opacity equal to or greater than 40% from all sources. (Similar to Condition 3.4.1 in existing permit).

Condition 3.4.2 prohibits the firing of fuel containing more than 2.5 percent sulfur, by weight in the compressor engines (Source Codes: ML01 through ML16), the generator engines (Source Codes: AUX1 through AUX3), and the air compressor engines (Source Codes: AC05 and AC08).

IV. Testing Requirements (with Associated Record Keeping and Reporting)

A. General Testing Requirements

The permit includes a requirement that the Permittee conduct performance testing on any specified emission unit when directed by the Division. Additionally, a written notification of any performance test(s) is required 30 days (or sixty (60) days for tests required by 40 CFR Part 63) prior to the date of the test(s) and a test plan is required to be submitted with the test notification. Test methods and procedures for determining compliance with applicable emission limitations are listed and test results are required to be submitted to the Division within 60 days of completion of the testing.

B. Specific Testing Requirements

Condition 4.2.1 requires performance testing to ensure compliance after the gas generator assembly and/or combustion can on the compressor turbines (Source Codes: ML17 and ML18) are replaced or rebuilt. (Same in existing permit).

Condition 4.2.2 requires NO_X performance testing on Compressor Turbine 02 (Source Code: ML18) and the establishment of the average combustor outlet temperature during these performance testing. (Same in existing permit).

Condition 4.2.3 requires performance testing on the air compressor engines (Source Codes: AC05 and AC08) after an engine rebuild. (Same in existing permit).

Condition 4.2.4 details the performance testing required for Condition 4.2.3. (Same in existing permit).

Condition 4.2.5 requires performance testing on Compressor Turbine 01 (Source Code: ML17) to determine compliance. (Same as existing permit).

Condition 4.2.6 requires the establishment of the average combustor outlet temperature during the performance testing dictated in Condition 4.2.5. (Same as existing permit).

V. Monitoring Requirements

A. General Monitoring Requirements

Condition 5.1.1 requires that all continuous monitoring systems required by the Division be operated continuously except during monitoring system breakdowns and repairs. Monitoring system response during quality assurance activities is required to be measured and recorded. Maintenance or repair is required to be conducted in an expeditious manner.

B. Specific Monitoring Requirements

Condition 5.2.1 requires the operation of a temperature-monitoring device on Compressor Turbine 01 and 02 (Source Codes: ML17 and ML18) to ensure proper operation and a non-resettable hour meter on Compressor Turbine 02 to calculate monthly and annual emission rates. (Same in existing permit).

Condition 5.2.2 requires analysis of the natural gas fired in Compressor Turbine 02 (Source Code: ML18) to determine compliance with the sulfur fuel limit. (Same in existing permit).

Condition 5.2.3 requires a non-resettable hour meter on the generator engines (Source Codes: AUX1 through AUX3). (Same in existing permit).

C. Compliance Assurance Monitoring (CAM)

Not Applicable

VI. Record Keeping and Reporting Requirements

A. General Record Keeping and Reporting Requirements

The Permit contains general requirements for the maintenance of all records for a period of five years following the date of entry and requires the prompt reporting of all information related to deviations from the applicable requirements. Records, including identification of any excess emissions, exceedances, or excursions from the applicable monitoring triggers, the cause of such occurrence, and the corrective action taken, are required to be kept by the Permittee and reporting is required on a semiannual basis.

B. Specific Record Keeping and Reporting Requirements

Condition 6.2.1 contains general record keeping requirements. (Same in existing permit).

Condition 6.2.2 requires the use of the NO_X mass emission rate to calculate 12-consecutive month total NO_X emissions from Compressor Turbine 02 (Source Code: ML18). (Same in existing permit).

Condition 6.2.3 requires the facility to notify the Division if the 12-consecutive month total NO_X emissions exceed 90 tpy. (Same in existing permit).

Condition 6.2.4 requires a semiannual report of the total NO_X emission data and natural gas analysis. (Same in existing permit).

Condition 6.2.5 lists the required records for the air compressor engines (Source Codes: AC05 and AC08), per 40 CFR 60 Subpart JJJJ. (Similar to Condition 6.2.7 in existing permit).

Condition 6.2.6 lists the submission of items to accompany the report required in Condition 6.1.4, per 40 CFR 60 Subpart KKKK. (Similar to Condition 6.2.8 in existing permit).

Condition 6.2.7 lists the information required in the compliance report in the case of malfunction or non-malfunction. (Same as in Condition 6.2.5 in existing permit).

Condition 6.2.8 requires the maintenance record of the performance tests conducted on the generator engines (Source Codes: AUX1 through AUX3), per 40 CFR 63 Subpart ZZZZ. (Same as Condition 6.2.6 in existing permit).

VII. Specific Requirements

A. Operational Flexibility

- None applicable.

B. Alternative Requirements

- None applicable.

C. Insignificant Activities

See Permit Application on GEOS website.
See Attachment B of the permit

D. Temporary Sources

- None applicable.

E. Short-Term Activities

- None applicable.

F. Compliance Schedule/Progress Reports

- None applicable.

G. Emissions Trading

- None applicable.

H. Acid Rain Requirements

- None applicable.

I. Stratospheric Ozone Protection Requirements

- None applicable.

J. Pollution Prevention

- None applicable.

K. Specific Conditions

- None applicable.

VIII. General Provisions

Generic provisions have been included in this permit to address the requirements in 40 CFR Part 70 that apply to all Title V sources, and the requirements in Chapter 391-3-1 of the Georgia Rules for Air Quality Control that apply to all stationary sources of air pollution.

Template Condition 8.14.1 was updated in September 2011 to change the default submittal deadline for Annual Compliance Certifications to February 28.

Template Condition Section 8.27 was updated in August 2014 to include more detailed, clear requirements for emergency generator engines exempt from SIP permitting and considered insignificant sources in the Title V permit.

Template Condition Section 8.28 was updated in August 2014 to more clearly define the applicability of the Boiler MACT or GACT for major or minor sources of HAP.

Addendum to Narrative

The 30-day public review started on month day, year and ended on month day, year. Comments were/were not received by the Division.

//If comments were received, state the commenter, the date the comments were received in the above paragraph. All explanations of any changes should be addressed below.//