Facility Name: **Transcontinental Gas Pipe Line Company, LLC – Compressor Station 120**
City: Stockbridge
County: Henry
AIRS #: 04-13-151-00025

Application #: TV-208629
Date Application Received: March 22, 2018
Permit No: 4922-151-0025-V-04-0

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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 120

2. Parent/Holding Company Name

   Transcontinental Gas Pipe Line Company, LLC

3. Previous and/or Other Name(s)

   Transco Compressor Station 120
   Transcontinental Gas Pipe Line Company – Compressor Station 120

4. Facility Location

   683 Valley Hill Road
   Stockbridge, Georgia 30281

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

   This facility is located in the Atlanta 8-hour ozone nonattainment area for 2015 NAAQ standards.

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 current 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, Current Permits, of the Title V application and the "Permit" file(s) on the facility found in the Air Branch office.

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

Permit Number and/or Off-Permit Change	Date of Issuance/ Effectiveness	Purpose of Issuance
4922-151-0025-V-03-0	October 1, 2013	Second Title V renewal permit

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)

   This 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 Georgia and adjacent states to transmit natural gas. Natural gas enters the compressor station. Compressors increase the pressure of the gas for transmission in the pipeline downstream of the compressor station. The compressors are driven by natural gas fired reciprocating engines and natural gas fired turbines.

4. Overall Process Flow Diagram

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

E. Regulatory Status

1. PSD/NSR

   This facility is currently classified as a major source, according to PSD regulations, because it has potential emissions of NOx, CO, and VOC greater than 250 tons per year (it is not one of the 28 named source categories under PSD). For the combustion turbine with source code T1, Transco has accepted a PSD avoidance limit of 4,400 hours of operation per year and 18.0 pounds of NOx per hour (Conditions 3.2.1 and 3.2.2). The facility is a major source under the nonattainment provisions of NSR because it has potential emissions of NOx greater than 100 tpy.

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	N/A			
H_2S	N/A			
Individual HAP	✓	✓		
Total HAPs	✓	✓		

3. MACT Standards

The facility is a major source for single HAP and combined HAPs because each PTE for acetaldehyde, acrolein, and formaldehyde is greater than 10 tpy, respectively, and the PTE for combined HAPs is greater than 25 tpy.

Mainline Unit 16 (T1), a Solar Centaur turbine, is subject to 40 CFR 63, Subpart YYYY – "National Emission Standards for Hazardous Air Pollutants for Stationary Combustion Turbines." This turbine is an existing unit and does not have to meet any of the requirements of this Subpart or Subpart A, per 40 CFR 63.6090(b)(4). Not even initial notification is required for an existing stationary combustion turbine.

Mainline Units 1 through 15 (ML01 – ML15) and Emergency Generator Units 1 through 3 (AUX1 – AUX3) are subject to 40 CFR 63, Subpart ZZZZ – "National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines." Mainline Units 1 through 15 meet the definition of existing spark ignition 2 stroke lean burn (2SLB) engines. Existing 2SLB engines do not have to meet any of the requirements of this Subpart or Subpart A, per 40 CFR 63.6590(b)(3). Not even initial notification is required for an existing 2SLB engine. Emergency Generator Units 1 through 3 are existing emergency engines that are less than 500 horsepower. These engines must meet work practice and record keeping requirements.

4. Program Applicability (AIRS Program Codes)

Program Code	Applicable (y/n)
Program Code 6 - PSD	No
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

None applicable.

C. Compliance Status

No noncompliance issues have been identified by the facility.

D. Permit Conditions

None applicable.

III. Regulated Equipment Requirements

A. Equipment List for the Process

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	**Description**	**Applicable Requirements/Standards**	**Corresponding Permit Conditions**	**ID No.**	**Description**
ML01	Mainline Unit No. 1	391-3-1-.02(2)(b) 391-3-1-.02(2)(g) 391-3-1-.02(2)(tt) 391-3-1-.02(2)(yy) 40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ Atlanta Ozone Attainment SIP	3.3.4, 3.4.1, 3.4.2, 3.4.3, 3.4.4, 5.2.2, 5.2.4, 6.2.3	N/A	None
ML02	Mainline Unit No. 2	391-3-1-.02(2)(b) 391-3-1-.02(2)(g) 391-3-1-.02(2)(tt) 391-3-1-.02(2)(yy) 40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ Atlanta Ozone Attainment SIP	3.3.4, 3.4.1, 3.4.2, 3.4.3, 3.4.4, 5.2.2, 5.2.4, 6.2.3	N/A	None
ML03	Mainline Unit No. 3	391-3-1-.02(2)(b) 391-3-1-.02(2)(g) 391-3-1-.02(2)(tt) 391-3-1-.02(2)(yy) 40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ Atlanta Ozone Attainment SIP	3.3.4, 3.4.1, 3.4.2, 3.4.3, 3.4.4, 5.2.2, 5.2.4, 6.2.3	N/A	None
ML04	Mainline Unit No. 4	391-3-1-.02(2)(b) 391-3-1-.02(2)(g) 391-3-1-.02(2)(tt) 391-3-1-.02(2)(yy) 40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ Atlanta Ozone Attainment SIP	3.3.4, 3.4.1, 3.4.2, 3.4.3, 3.4.4, 5.2.2, 5.2.4, 6.2.3	N/A	None
ML05	Mainline Unit No. 5	391-3-1-.02(2)(b) 391-3-1-.02(2)(g) 391-3-1-.02(2)(tt) 391-3-1-.02(2)(yy) 40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ Atlanta Ozone Attainment SIP	3.3.4, 3.4.1, 3.4.2, 3.4.3, 3.4.4, 5.2.2, 5.2.4, 6.2.3	N/A	None
ML06	Mainline Unit No. 6	391-3-1-.02(2)(b) 391-3-1-.02(2)(g) 391-3-1-.02(2)(tt) 391-3-1-.02(2)(yy) 40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ Atlanta Ozone Attainment SIP	3.3.4, 3.4.1, 3.4.2, 3.4.3, 3.4.4, 5.2.2, 5.2.4, 6.2.3	N/A	None
ML07	Mainline Unit No. 7	391-3-1-.02(2)(b) 391-3-1-.02(2)(g) 391-3-1-.02(2)(tt) 391-3-1-.02(2)(yy) 40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ Atlanta Ozone Attainment SIP	3.3.4, 3.4.1, 3.4.2, 3.4.3, 3.4.4, 5.2.2, 5.2.4, 6.2.3	N/A	None

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	**Description**	**Applicable Requirements/Standards**	**Corresponding Permit Conditions**	**ID No.**	**Description**
ML08	Mainline Unit No. 8	391-3-1-.02(2)(b) 391-3-1-.02(2)(g) 391-3-1-.02(2)(tt) 391-3-1-.02(2)(yy) 40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ Atlanta Ozone Attainment SIP	3.3.4, 3.4.1, 3.4.2, 3.4.3, 3.4.4, 5.2.2, 5.2.4, 6.2.3	N/A	None
ML09	Mainline Unit No. 9	391-3-1-.02(2)(b) 391-3-1-.02(2)(g) 391-3-1-.02(2)(tt) 391-3-1-.02(2)(yy) 40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ Atlanta Ozone Attainment SIP	3.3.4, 3.4.1, 3.4.2, 3.4.3, 3.4.4, 5.2.2, 5.2.4, 6.2.3	N/A	None
ML10	Mainline Unit No. 10	391-3-1-.02(2)(b) 391-3-1-.02(2)(g) 391-3-1-.02(2)(tt) 391-3-1-.02(2)(yy) 40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ Atlanta Ozone Attainment SIP	3.3.4, 3.4.1, 3.4.2, 3.4.3, 3.4.4, 5.2.2, 5.2.4, 6.2.3	N/A	None
ML11	Mainline Unit No. 11	391-3-1-.02(2)(b) 391-3-1-.02(2)(g) 391-3-1-.02(2)(tt) 391-3-1-.02(2)(yy) 40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ Atlanta Ozone Attainment SIP	3.3.4, 3.4.1, 3.4.2, 3.4.3, 3.4.4, 5.2.2, 5.2.4, 6.2.3	N/A	None
ML12	Mainline Unit No. 12	391-3-1-.02(2)(b) 391-3-1-.02(2)(g) 391-3-1-.02(2)(tt) 391-3-1-.02(2)(yy) 40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ Atlanta Ozone Attainment SIP	3.3.4, 3.4.1, 3.4.2, 3.4.3, 3.4.4, 5.2.2, 5.2.4, 6.2.3	N/A	None
ML13	Mainline Unit No. 13	391-3-1-.02(2)(b) 391-3-1-.02(2)(g) 391-3-1-.02(2)(tt) 391-3-1-.02(2)(yy) 40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ Atlanta Ozone Attainment SIP	3.3.4, 3.4.1, 3.4.2, 3.4.3, 3.4.4, 5.2.2, 5.2.4, 6.2.3	N/A	None
ML14	Mainline Unit No. 14	391-3-1-.02(2)(b) 391-3-1-.02(2)(g) 391-3-1-.02(2)(tt) 391-3-1-.02(2)(yy) 40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ Atlanta Ozone Attainment SIP	3.3.4, 3.4.1, 3.4.2, 3.4.3, 3.4.4, 5.2.2, 5.2.4, 6.2.3	N/A	None
ML15	Mainline Unit No. 15	391-3-1-.02(2)(b) 391-3-1-.02(2)(g) 391-3-1-.02(2)(tt) 391-3-1-.02(2)(yy) 40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ Atlanta Ozone Attainment SIP	3.3.4, 3.4.1, 3.4.2, 3.4.3, 3.4.4, 5.2.2, 5.2.4, 6.2.3	N/A	None

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	**Description**	**Applicable Requirements/Standards**	**Corresponding Permit Conditions**	**ID No.**	**Description**
T1	Mainline Unit No. 16 (Solar Centaur Turbine)	391-3-1-.02(2)(b) 391-3-1-.02(2)(g) 391-3-1-.02(2)(tt) 391-3-1-.02(2)(yy) 40 CFR 60 Subpart A 40 CFR 60 Subpart GG 40 CFR 63 Subpart A 40 CFR 63 Subpart YYYY PSD avoidance	3.2.1, 3.2.2, 3.3.1, 3.3.2, 3.3.3, 3.4.1, 3.4.2, 3.4.3, 4.2.1, 4.2.2, 5.2.1, 5.2.2, 5.2.3, 6.2.1, 6.2.2, 7.1.2	N/A	None
AUX1	Emergency Generator Unit No. 1	391-3-1-.02(2)(b) 391-3-1-.02(2)(g) 391-3-1-.02(2)(mmm) 40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ	3.3.4, 3.3.5, 3.3.6, 3.3.7, 3.3.8, 3.3.9, 3.3.10, 3.3.11, 3.4.1, 3.4.2, 5.2.2, 6.2.4, 6.2.5, 6.2.6, 6.2.7	N/A	None
AUX2	Emergency Generator Unit No. 2	391-3-1-.02(2)(b) 391-3-1-.02(2)(g) 391-3-1-.02(2)(mmm) 40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ	3.3.4, 3.3.5, 3.3.6, 3.3.7, 3.3.8, 3.3.9, 3.3.10, 3.3.11, 3.4.1, 3.4.2, 5.2.2, 6.2.4, 6.2.5, 6.2.6, 6.2.7	N/A	None
AUX3	Emergency Generator Unit No. 3	391-3-1-.02(2)(b) 391-3-1-.02(2)(g) 391-3-1-.02(2)(mmm) 40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ	3.3.4, 3.3.5, 3.3.6, 3.3.7, 3.3.8, 3.3.9, 3.3.10, 3.3.11, 3.4.1, 3.4.2, 5.2.2, 6.2.4, 6.2.5, 6.2.6, 6.2.7	N/A	None

B. Equipment & Rule Applicability

Emission and Operating Caps:

Mainline Unit 16 (T1) is limited to 4,400 hours of operation during any 12 consecutive month period, and the NOx emissions from the turbine are limited to 18.0 lb/hr. These limits were accepted by the facility in order to avoid PSD review for the turbine.

Rules and Regulations Assessment:

Mainline Units 1 through 15 (ML01 – ML15):

The fifteen internal combustion engines (ML01 – ML15), were manufactured and installed between 1950 and 1969. These internal combustion engines burn only natural gas and have heat input capacities between 21.7 and 32.7 MMBtu/hr. The maximum power output ranges from 2,500 to 3,400 horsepower. The engines are two stroke lean burn (2SLB) engines. These emission units are subject to Georgia Rule (b) for opacity, Rule (g) for sulfur dioxide, Rule (tt) for VOC RACT, and Rule (yy) for NOx RACT. The engines are also subject to 40 CFR 63 Subpart ZZZZ, the RICE MACT. There are no requirements in the RICE MACT for existing 2SLB engines. Additionally, more stringent NOx limits apply during the ozone season due to the Atlanta Ozone Attainment SIP.

Mainline Unit 16 (T1):

The Solar Centaur combustion turbine (T1) was manufactured and installed in 1980. This combustion turbine burns only natural gas and has a maximum heat input capacity of 51.9 MMBtu/hr. Since the heat input capacity exceeds 10.7 gigajoules per hour (10.1 million Btu/hr) and the turbine was installed after October 1977, this emission unit is subject to 40 CFR 60 Subpart GG which contains emission limits for SO2 and NOx. Georgia Rule (yy) for NOx RACT and Rule (g) for SO2 are both subsumed by the SO2 and NOx limits of Subpart GG. PSD avoidance required Transco to accept a stricter NOx limit of 18.0 lb/hr. The turbine is subject to Georgia Rule (b) for opacity and Rule (tt) for VOC RACT. The turbine is also subject to 40 CFR 63 Subpart YYYY, the Turbine MACT. There are no requirements in the Turbine MACT for existing turbines.

Emergency Generators 1 through 3 (AUX1 – AUX3):

The three emergency generators powered by internal combustion engines (AUX1 – AUX3) were manufactured and installed in 1951. These internal combustion engines burn only natural gas. Each has a heat input capacity of 3 MMBtu/hr. These emission units are subject to Georgia Rule (b) for opacity, Rule (g) for fuel sulfur content, and Rule (mmm) for NOx emissions from stationary engines used to generate electricity. The engines are also subject to 40 CFR 63 Subpart ZZZZ, the RICE MACT. The RICE MACT contains work practice and record keeping requirements for these engines. These engines will be operated as emergency use only generators.

Air Compressors 1 and 2 (ACO1 and AC02):

Air Compressors 1 and 2 (AC01 and AC02) were removed from service in 2012 and have, therefore, been removed from this permit.

C. Permit Conditions

- Condition 3.2.1 limits the hours of operation for the combustion turbine (T1) for PSD avoidance. This condition is carried over from Condition 3.2.1 in Permit 4922-151-0025-V-03-0.

- Condition 3.2.2 limits the nitrogen oxides emissions from the combustor turbine (T1) for PSD avoidance. This condition is carried over from Condition 3.2.2 in Permit 4922-151-0025-V-03-0.

- Condition 3.3.1 specifies that the combustion turbine (T1) is subject to 40 CFR 60 Subpart A and 40 CFR 60 Subpart GG. This condition is carried over from Condition 3.3.1 in Permit 4922-151-0025-V-03-0.

- Condition 3.3.2 contains the fuel sulfur limit for the combustion turbine (T1) per 40 CFR 60 Subpart GG. This condition is carried over from Condition 3.3.2 in Permit 4922-151-0025-V-03-0.

- Condition 3.3.3 specifies that the combustion turbine (T1) is subject to 40 CFR 63 Subpart YYYY. This condition is carried over from Condition 3.3.3 in Permit 4922-151-0025-V-03-

0. Note that the facility requested that this condition be deleted because existing combustion turbines are not subject to Subpart YYYY. The facility is mistaken on this point. Affected sources subject to Subpart YYYY are defined in 40 CFR 63.6090(a) as "…any existing, new, or reconstructed stationary combustion turbine located at a major source of HAP emissions." However, 40 CFR 63.6090(b)(4) states, "Existing stationary combustion turbines in all subcategories do not have to meet the requirements of this subpart and of subpart A of this part. No initial notification is necessary for any existing stationary combustion turbine, even if a new or reconstructed turbine in the same category would require an initial notification."

- Condition 3.3.4 specifies that Mainline Units 1 through 15 (ML01 – ML15) and Emergency Generator Units 1 through 3 (AUX1 – AUX3) are subject to 40 CFR 63 Subpart ZZZZ. This condition is carried over from Condition 3.3.4 in Permit 4922-151-0025-V-03-0.

- Conditions 3.3.5 through 3.3.11 incorporate RICE MACT as it applies to Emergency Generator Units 1 through 3 (AUX1 – AUX3). These conditions are carried over from conditions 3.3.5 through 3.3.11 in Permit 4922-151-0025-V-03-0.

- Condition 3.3.5 specifies that the emergency generators must comply with the applicable portions of 40 CFR 63 Subpart A as specified in Table 8 of Subpart ZZZZ.

- Condition 3.3.6 specifies the work practice standards that are applicable for the emergency generators from Table 2c Item 6 of Subpart ZZZZ.

- Condition 3.3.7 contains the RICE MACT requirement that the time for startup be minimized and startup is limited to 30 minutes.

- Condition 3.3.8 specifies the operating limitations for the emergency generators specified in Table 6 Item 9 of Subpart ZZZZ.

- Condition 3.3.9 provides that the facility may extend the oil change requirement specified in Condition 3.3.6 provided an oil sampling program is conducted as specified in 40 CFR 63.6625(j).

- Condition 3.3.10 limits the hours of operation for the emergency generators to 200 hours per year for emergency situations, 100 hours per year for maintenance checks and readiness testing. The condition contains the most stringent operating limitations of 40 CFR 63.6640(f)(1) and Georgia Rule 391-3-1-.02(2)(mmm).

- Condition 3.3.11 specifies that the emergency generators are subject to the requirements specified in 40 CFR 63.6605(a) and (b).

- Condition 3.4.1 contains the opacity limit for all emission units per Georgia Rule (b). This condition is carried over from Condition 3.4.1 in Permit 4922-151-0025-V-03-0.

- Condition 3.4.2 contains the fuel sulfur limit for all emission units per Georgia Rule (g). This condition has been carried over from Condition 3.4.4 in Permit 4922-151-0025-V-03-0.

- Condition 3.4.3 requires that units ML01 – ML15 and T1 use good combustion practices as VOC Reasonably Available Control Technology (RACT), a requirement of Georgia Rule (tt). This condition is carried over from Condition 3.4.3 in Permit 4922-151-0025-V-03-0.

- Condition 3.4.4 limits the NOx emissions from Mainline Units 1 through 15 (ML01 – ML15), per the Atlanta Ozone Attainment SIP and NOx RACT, per Georgia Rule (yy). This condition is carried over from Condition 3.4.4 in Permit 4922-151-0025-V-03-0.

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 a performance test on the combustion turbine (T1) at 24-month intervals to demonstrate compliance with the turbine's NOx limit and to re-establish the combustor outlet temperature at which compliance with the NOx limit is demonstrated. The combustor outlet temperature is used for monitoring the combustion turbine.

The combustion turbine (T1) is a Solar Centaur turbine. When the turbine is in need of an overhaul, it is conducted as part of Solar's turbine overhaul program. During an overhaul, the existing turbine is removed and an "exchange" turbine is installed during the same shutdown time period. Prior to shipment to a facility, the "exchange" turbine is tested at Solar's overhaul facility to document that all of a facility's original performance specifications and emissions standards are met. Condition 4.2.2 requires that the Permittee conduct a performance test on the "exchange" turbine or submit the data from the test conducted at the Solar facility. If data is submitted from the Solar facility test, the Permittee must conduct an evaluation using a portable analyzer.

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

The emission units at the facility consist of 18 internal combustion (IC) engines and one combustion turbine. Fifteen of the IC engines and the turbine drive compressor pumps. The remaining three IC engines drive emergency generators. All of these units combust only pipeline quality natural gas. The IC engines are subject to Georgia Rules (b) and (g) for opacity and fuel sulfur. The IC engines are also subject to 40 CFR 63 Subpart ZZZZ, the RICE MACT. The RICE MACT contains no requirements for the fifteen engines that drive compressor pumps. The combustion turbine is subject to Georgia Rule (b) for opacity, a fuel sulfur limit in 40 CFR 60 Subpart GG, and hours limits and NOx mass emission limits to avoid the requirements of Prevention of Significant Deterioration (PSD) rules.

Opacity and particulate matter from the combustion of natural gas is negligible, and pipeline quality natural gas contains insignificant amounts of sulfur. Since the likelihood of violating any of the State Rules listed in the above paragraph is minimal, monitoring is not required. In order to comply with the fuel sulfur limit from Subpart GG, the Permittee is no longer required to monitor fuel sulfur content of natural gas if the Permittee can demonstrate that the natural gas meets the Subpart's definition of natural gas. The Subpart specifies what sources of information may be used to make this demonstration. The Subpart GG fuel sulfur monitoring requirements are in Condition 5.2.3.

Formation of NOx by combustion turbines is related to the temperature of the combustion gases at the outlet of the combustor. As the combustor outlet temperature increases, the general trend is for NOx concentrations (ppm) to increase. In order to assure compliance with the mass emissions limitation, the combustor outlet temperature is required to be continuously monitored. This monitoring requirement is in Condition 5.2.1. A periodic emission test is required to re-establish the average temperature at which a report will be required. The turbine also has an hours of operation per year limit. A non-resettable hours meter is required by Condition 5.2.2i.

The rate of NOx formation in each of the reciprocating engines is related to several engine operating parameters. The Division has determined that the three most useful are engine speed, ignition timing, and air manifold pressure. Condition 5.2.2 requires hourly monitoring of these parameters for all mainline reciprocating engines (ML01 – ML15). In addition to the parameter monitoring on the 15 mainline IC engines, Condition 5.2.4 requires a NOx survey on these engines. This NOx survey may be conducted using a portable analyzer and is required to rotate among the engines.

The three emergency generators are required by the RICE MACT to install a non-resettable hour meter. This requirement is included as Condition 5.2.2j.

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.

Template Conditions 6.1.3 and 6.1.4 were updated in September 2011 to allow ~60 days to submit periodic reports. Alternative reporting deadlines are allowed per 40 CFR 70.6, 40 CFR 60.19(f) and 40 CFR 63.10(a).

B. Specific Record Keeping and Reporting Requirements

The facility is required to maintain monthly hours of operation for the combustion turbine (T1) by Condition 6.2.1. Reports of the 12-consecutive month total hours of operation are required by Condition 6.2.2.

Condition 6.2.3 requires an operating parameters summary document for the 15 mainline IC engines. The operating parameters summary document must contain the required ranges and values for engine speed, air manifold pressure, and engine timing based on the results from previously conducted emission tests. This document, therefore, is the basis of the excursions reported for these parameters.

The RICE MACT contains various generally applicable record keeping and reporting requirements. These requirements have been included in Conditions 6.2.4 through 6.2.7

VII. Specific Requirements

A. Operational Flexibility

Condition 7.1.2 allows the Permittee to change out certain components of Mainline Unit No. 16 (Centaur Turbine, Emission Unit T1) with refurbished equipment. The Permittee is required to notify the Division of the change out and to test the turbine with the refurbished equipment.

B. Alternative Requirements

Not 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

The standard permit condition pursuant to 40 CFR 82 Subpart F has been included in the Title V Permit. These Title VI requirements apply to all air conditioning and refrigeration units containing ozone-depleting substances regardless of the size of the unit or of the source.

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 currently 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.//