



EXPEDITED PERMITTING PROGRAM – APPLICATION FOR ENTRY TO PROGRAM FOR AIR PERMITS

RECEIVED

EPD Use Only

Date Received: **APR 6 2023**

Application No. _____

AIR PROTECTION BRANCH

To be eligible for expedited review, this application form must be accompanied by the complete permit application for the type of air permit being requested.

1. Contact Information

Facility Name: Delta Air Lines, Inc. - Technical Operations Center

AIRS No. (if known): 04-13- 063 - 00105

Contact Person: Dika Kuoh Title: Air Program Manager

Telephone No.: 470-654-2195

Alternate Phone No.: _____

Email Address: dika.kuoh@delta.com

If EPD is unable to contact me, please contact the alternate contact person:

Contact Person: _____ Title: _____

Telephone No.: _____

Alternate Phone No.: _____

Email Address: _____

On Page 2 of this form, please check the appropriate box for which type of air permit you are requesting expedited review.

I have read the Expedited Review Program Standard Operating Procedures and accept all of the terms and conditions within. I have participated in the required pre-application meeting with EPD. I understand that it is my responsibility to ensure an application of the highest quality is submitted and to address any requests for additional information by the deadline specified. I understand that submittal of this request form is not a guarantee that expedited review will be granted.

Signature: _____

A handwritten signature in black ink, appearing to read "Dika Kuoh", written over a horizontal line.

Date: _____

3/31/23

2. Applying For Which Type Of Permit: (Please Check Appropriate Box)

Expedited Review Fees for Air Permits	
<u>Permit Type – Please Check One</u>	<u>Expedited Review Fee* as of March 1, 2021</u>
<input type="checkbox"/> Generic Permit: Concrete Batch Plant – Minor Source	\$1,250
<input type="checkbox"/> Generic Permit: Concrete Batch Plant – Synthetic Minor Source	\$1,875
<input type="checkbox"/> Generic Permit: Hot Mix Asphalt Plant – Synthetic Minor Source	\$2,500
<input type="checkbox"/> Minor Source Permit (or Amendment)	\$3,750
<input type="checkbox"/> Synthetic Minor Permit (or Amendment)	\$5,000
<input type="checkbox"/> Major Source SIP Permit not subject to PSD or 112(g)	\$7,500
<input type="checkbox"/> Title V 502(b)(10) Permit Amendment	\$5,000
<input type="checkbox"/> Title V Minor Modification with Construction	\$5,000
<input type="checkbox"/> Title V Significant Modification	\$7,500
<input type="checkbox"/> Major Source SIP Permit subject to 112(g) but not subject to PSD	\$18,750
<input type="checkbox"/> PSD Permit (or Amendment) not subject to NAAQS and/or PSD Increment Modeling	\$18,750
<input type="checkbox"/> PSD Permit (or Amendment) subject to NAAQS and/or PSD Increment Modeling but not subject to Modeling for PM _{2.5} , NO ₂ , or SO ₂	\$25,000
<input checked="" type="checkbox"/> PSD Permit (or Amendment) subject to NAAQS and/or PSD Increment Modeling for PM _{2.5} , NO ₂ , or SO ₂	\$31,250
<input type="checkbox"/> PSD Permit (or Amendment) subject to NAAQS and/or PSD Increment Modeling for PM _{2.5} , NO ₂ , or SO ₂ and also impacting a Class I Area	\$37,500
<input type="checkbox"/> Nonattainment NSR Review Permit (or Amendment)	\$50,000
<p>* Do not send fee payment with this form. Upon acceptance of application for the expedited permit program, EPD will notify you and an invoice will appear on GEEO. Fees must be paid via check to "Georgia Department of Natural Resources" within ten (10) business days of acceptance.</p>	

3. Comments.

This section is optional. Applicants may use this field to include specific comments or requests for EPD consideration. For example, the applicant may use this field to request a public hearing or to remind EPD of review time needs and/or expectations that may differ from the time frames in the procedures.



SIP AIR PERMIT APPLICATION

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Application No. _____

AIR PROTECTION BRANCH

FORM 1.00: GENERAL INFORMATION

1. Facility Information

Facility Name: Delta Air Lines, Inc. – Technical Operations Center
AIRS No. (if known): 04-13- 063 - 00105
Facility Location: Street: 1775 MH Jackson Service Rd
City: Atlanta Georgia Zip: 30354 County: Clayton
Is this facility a "small business" as defined in the instructions? Yes: ☐ No: ☒

2. Facility Coordinates

Latitude: 33° 38' 36" **NORTH** Longitude: 84° 24' 50" **WEST**
UTM Coordinates: **EAST** **NORTH** **ZONE**

3. Facility Owner

Name of Owner: Delta Air Lines, Inc.
Owner Address Street: 1775 MH Jackson Service Rd
City: Atlanta State: Georgia Zip: 30354

4. Permitting Contact and Mailing Address

Contact Person: Dika Kuoh Title: Air Program Manager
Telephone No.: (470) 654-2195 Ext. Fax No.:
Email Address: dika.kuoh@delta.com
Mailing Address: Same as: ☐ Facility Location: ☐ Owner Address: ☐ Other: ☒
If Other: Street Address: P.O. Box 20706
City: Atlanta State: Georgia Zip: 30354

5. Authorized Official

Name: David Thompson Title: Vice President - Engineering, Quality & Safety
Address of Official Street: 1775 MH Jackson Service Rd
City: Atlanta State: Georgia Zip: 30354

This application is submitted in accordance with the provisions of the Georgia Rules for Air Quality Control and, to the best of my knowledge, is complete and correct.

Signature: _____

Date: 3/31/23

6. Reason for Application: (Check all that apply)

- ☐ New Facility (to be constructed)
 ☐ Revision of Data Submitted in an Earlier Application
☒ Existing Facility (initial or modification application)
 Application No.: _____
☐ Permit to Construct
 Date of Original Submittal: _____
☒ Permit to Operate
☐ Change of Location
☒ Permit to Modify Existing Equipment:
 Affected Permit No.: 4512-063-0105-V-04-0

7. Permitting Exemption Activities (for permitted facilities only):

Have any exempt modifications based on emission level per Georgia Rule 391-3-1-.03(6)(i)(3) been performed at the facility that have not been previously incorporated in a permit?

- ☒ No
 ☐ Yes, please fill out the SIP Exemption Attachment (See Instructions for the attachment download)

8. Has assistance been provided to you for any part of this application?

- ☐ No
 ☐ Yes, SBAP
 ☒ Yes, a consultant has been employed or will be employed.

If yes, please provide the following information:

Name of Consulting Company: Montrose Environmental
 Name of Contact: Thomas Sweat
 Telephone No.: (678) 336-8530 Fax No.: _____
 Email Address: tsweat@montrose-env.com
 Mailing Address:
 Street: 400 Northridge Road, Suite 400
 City: Sandy Springs State: GA Zip: 30350

Describe the Consultant's Involvement:

Montrose Environmental is the air quality permitting consultant for this project.

9. Submitted Application Forms: Select only the necessary forms for the facility application that will be submitted.

No. of Forms	Form
1	2.00 Emission Unit List
	2.01 Boilers and Fuel Burning Equipment
	2.02 Storage Tank Physical Data
	2.03 Printing Operations
	2.04 Surface Coating Operations
	2.05 Waste Incinerators (solid/liquid waste destruction)
	2.06 Manufacturing and Operational Data
	3.00 Air Pollution Control Devices (APCD)
	3.01 Scrubbers
	3.02 Baghouses & Other Filter Collectors
	3.03 Electrostatic Precipitators
	4.00 Emissions Data
	5.00 Monitoring Information
	6.00 Fugitive Emission Sources
	7.00 Air Modeling Information

10. Construction or Modification Date

Estimated Start Date: At permit approval, approximately September 2023

11. If confidential information is being submitted in this application, were the guidelines followed in the "Procedures for Requesting that Submitted Information be treated as Confidential"?

☒ No ☐ Yes

12. New Facility Emissions Summary

Criteria Pollutant	New Facility	
	Potential (tpy)	Actual (tpy)
Carbon monoxide (CO)	NA	NA
Nitrogen oxides (NOx)	NA	NA
Particulate Matter (PM) (filterable only)	NA	NA
PM <10 microns (PM10)	NA	NA
PM <2.5 microns (PM2.5)	NA	NA
Sulfur dioxide (SO ₂)	NA	NA
Volatile Organic Compounds (VOC)	NA	NA
Greenhouse Gases (GHGs) (in CO ₂ e)	NA	NA
Total Hazardous Air Pollutants (HAPs)	NA	NA
Individual HAPs Listed Below:		

13. Existing Facility Emissions Summary

Criteria Pollutant	Current Facility		After Modification	
	Potential (tpy)	Actual (tpy)	Potential (tpy)	Actual (tpy)
Carbon monoxide (CO)	205.98		196.50	
Nitrogen oxides (NOx)	451.97		562.46	
Particulate Matter (PM) (filterable only)	30.44		29.11	
PM <10 microns (PM10)	30.44		29.11	
PM <2.5 microns (PM2.5)	30.44		29.11	
Sulfur dioxide (SO ₂)	321.52		323.54	
Volatile Organic Compounds (VOC)	228.22		226.68	
Greenhouse Gases (GHGs) (in CO ₂ e)-metric tons per year	39,859		46,708	
Total Hazardous Air Pollutants (HAPs)	65.38		66.07	
Individual HAPs Listed Below:				
Cr & Compounds	7.4		7.4	
Xylene	0		0.01	

Trichloroethylene	16.49		16.49	
4-Chloro-ethylene	4.95		4.95	
Toluene	4.00		4.02	
Ethylene Glycol	9.81		9.81	

14. 4-Digit Facility Identification Code:

SIC Code: <u>4512</u>	SIC Description: <u>Air Transportation, Scheduled</u>
NAICS Code: <u>481111</u>	NAICS Description: <u>Scheduled Passenger Air Transportation</u>

15. Description of general production process and operation for which a permit is being requested. If necessary, attach additional sheets to give an adequate description. Include layout drawings, as necessary, to describe each process. References should be made to source codes used in the application.

Delta constructed Test Cell No. 5 to accommodate future aircraft engines for which Test Cell Nos. 1-4 did not have the capability to house. Test Cell No. 5 was constructed in 2017 with operations commencing in January 2019. When Test Cell No. 5 was initially permitted on July 12, 2017 (Permit Amendment No. 4512-063-0105-V-03-2) Delta requested a NO_x limit of 39.5 tons/yr (tpy) to establish that the project was not a major modification with respect to PSD permitting regulations. The 2017 project was considered a major modification with respect to NNSR, given that the net emissions increase exceeded 25 tpy NO_x (which was the major modification threshold in 2017). The NNSR major modification requirements were addressed in Permit Amendment No. 4512-063-0105-V-03-2.

Due to increased demand for engine testing, Delta is requesting an increased NO_x limit of 150 tpy for Test Cell No. 5. Since Delta is requesting the relaxation of a PSD avoidance limit that was placed on Test Cell No. 5 in the permit to construct, this application will address the PSD requirements that would have been triggered without the PSD avoidance limits. The application and emission calculations have been prepared as if Test Cell No. 5 were a new unit. Since the Test Cell No. 5 project will now be a PSD major modification, the net emissions increase from the project (at the higher requested NO_x limit and operating level) will be evaluated to determine whether the PSD Significant Emission Rate (SER) threshold is exceeded for any regulated pollutants. With the increase in operations of Test Cell No. 5, Delta is proposing usage increases to that engine test cell only. No additional equipment will be installed.

Expedited review is requested for this permitting action. The required expedited review form is included in this application package.

16. Additional information provided in attachments as listed below:

Attachment A -	<u>Appendix A – Figures</u>
Attachment B -	<u>Appendix B – Emissions Calculations</u>
Attachment C -	<u>Appendix C – Modeling Protocol and Modeling Report</u>
Attachment D -	<u>Appendix D – BACT and RACT Supporting Documents</u>
Attachment E -	<u>Appendix E – Title V GEOS File and Redline/Strikeout Title V Permit</u>
Attachment F -	<u>Appendix F – Excerpts from Previous Application</u>
Attachment H -	<u>Appendix H – Nonattainment New Source Review Addendum</u>

17. Additional Information: Unless previously submitted, include the following two items:

- ☒ Plot plan/map of facility location or date of previous submittal: See Appendix A.
- ☒ Flow Diagram or date of previous submittal: See Title V Renewal Application Filed 10/28/2019.

18. Other Environmental Permitting Needs:

Will this facility/modification trigger the need for environmental permits/approvals (other than air) such as Hazardous Waste Generation, Solid Waste Handling, Water withdrawal, water discharge, SWPPP, mining, landfill, etc.?

- ☒ No ☐ Yes, please list below:

19. List requested permit limits including synthetic minor (SM) limits.

Proposed Test Cell No. 5 NOx limit to establish the PTE of 150 tpy.

20. Effective March 1, 2019, permit application fees will be assessed. The fee amount varies based on type of permit application. Application acknowledgement emails will be sent to the current registered fee contact in the GECO system. If fee contacts have changed, please list that below:

Fee Contact name:

Fee Contact email address:

Fee Contact phone number:

Fee invoices will be created through the GECO system shortly after the application is received. It is the applicant's responsibility to access the facility GECO account, generate the fee invoice, and submit payment within 10 days after notification.

