

AIR QUALITY PERMIT

Permit No.
4922-095-0110-S-01-0

Effective Date

In accordance with the provisions of the Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq and the Rules, Chapter 391-3-1, adopted pursuant to and in effect under that Act,

Facility Name: **Sabal Trail Transmission, LLC – Albany Compressor Station**

Mailing Address: P.O. Box 1642
Houston, Texas 77251

is issued a Permit for the following:

Construction and operation of a natural gas compressor station including two 20,500 HP natural gas-fired compressor turbines. This Permit is issued for the purpose of establishing practically enforceable emission limitation such that the facility will not be considered a major source with respect to Title V of the Clean Air Act Amendments of 1990.

Facility Location: 2604 W. Oakridge Drive
Albany, Georgia 31721 (Dougherty County)

This Permit is conditioned upon compliance with all provisions of The Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq, the Rules, Chapter 391-3-1, adopted and in effect under that Act, or any other condition of this Permit.

This Permit may be subject to revocation, suspension, modification or amendment by the Director for cause including evidence of noncompliance with any of the above; or for any misrepresentation made in Application No. 23350 dated July 6, 2015; any other applications upon which this Permit is based; supporting data entered therein or attached thereto; or any subsequent submittals or supporting data; or for any alterations affecting the emissions from this source.

This Permit is further subject to and conditioned upon the terms, conditions, limitations, standards, or schedules contained in or specified on the attached **9** pages.

Director
Environmental Protection Division

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Equipment List

Emission Units		Control Devices	
Source Code	Description	Source Code	Description
CT01	Combustion Turbine No. 1 (Solar Titan 130-20502S4 with SoLoNOx)	OC01	Oxidation Catalyst
CT02	Combustion Turbine No. 1 (Solar Titan 130-20502S4 with SoLoNOx)	OC02	Oxidation Catalyst
FH01	Fuel Gas Heater No. 1 (Cameron [Eclipse Burner])	N/A	None
FH02	Fuel Gas Heater No. 2 (Cameron [Eclipse Burner])	N/A	None
EN01	Emergency Generator (Waukesha VGF36GL)	N/A	None

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1. General Requirements

- 1.1 At all times, including periods of startup, shutdown, and malfunction, the Permittee shall maintain and operate this source, including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Division which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection or surveillance of the source.
- 1.2 The Permittee shall not build, erect, install or use any article, machine, equipment or process the use of which conceals an emission which would otherwise constitute a violation of an applicable emission standard. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with an opacity standard or with a standard that is based on the concentration of a pollutant in the gases discharged into the atmosphere.
- 1.3 The Permittee shall submit a Georgia Air Quality Permit application to the Division prior to the commencement of any modification, as defined in 391-3-1-.01(pp), which may result in air pollution and which is not exempt under 391-3-1-.03(6). Such application shall be submitted sufficiently in advance of any critical date involved to allow adequate time for review, discussion, or revision of plans, if necessary. The application shall include, but not be limited to, information describing the precise nature of the change, modifications to any emission control system, production capacity and pollutant emission rates of the plant before and after the change, and the anticipated completion date of the change.
- 1.4 Unless otherwise specified, all records required to be maintained by this Permit shall be recorded in a permanent form suitable for inspection and submission to the Division and shall be retained for at least five (5) years following the date of entry.
- 1.5 In cases where conditions of this Permit conflict with each other for any particular source or operation, the most stringent condition shall prevail.

2. Allowable Emissions

Turbines

- 2.1 The Permittee shall comply with all the applicable provisions of the New Source Performance Standards (NSPS), 40 CFR 60, Subpart A – “General Provisions,” and Subpart KKKK – “Standards of Performance for Stationary Combustion Turbines,” for the operation of Combustion Turbines 1 and 2 (Source Codes CT01 and CT02).
[40 CFR 60, Subparts A and KKKK]

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- 2.2 The Permittee shall not discharge or cause the discharge into the atmosphere from Combustion Turbines 1 and 2 (Source Codes CT01 and CT02) any gases which contain nitrogen oxides (NO_x) in excess of 25 parts per million (ppm) by volume on a dry basis corrected to 15 percent oxygen.
[40 CFR 60.4320(a)]
- 2.3 The Permittee shall not combust in Combustion Turbines 1 and 2 (Source Codes CT01 and CT02) any natural gas with a sulfur content that would allow emissions in excess of 0.060 lb SO₂ per MMBtu of heat input.
[40 CFR 60.4330(a)(2)]
- 2.4 The Permittee shall not discharge or cause the discharge into the atmosphere from Combustion Turbines 1 and 2 (Source Codes CT01 and CT02) during normal operation (all periods other than startup or shutdown) any gases which contain emissions in total quantities exceeding the allowable rate as indicated below:
[Title V avoidance]
 - a. NO_x emission in excess of 5.2 pounds per hour.
 - b. CO emissions in excess of 0.50 pounds per hour.

Emergency Generator

- 2.5 The Permittee shall comply with all the applicable provisions of the New Source Performance Standards (NSPS), 40 CFR 60, Subpart A – “General Provisions,” and Subpart JJJJ – “Standards of Performance for Stationary Spark Ignition Internal Combustion Engines,” for the operation of the Emergency Generator (Source Code EN01).
[40 CFR 60, Subparts A and JJJJ]
- 2.6 The Permittee shall comply with all the applicable provisions of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR 63, Subpart A – “General Provisions,” and Subpart ZZZZ – “National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines,” for the operation of the Emergency Generator (Source Code EN01).
[40 CFR 63, Subparts A and ZZZZ]

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- 2.7 The Permittee shall not cause, let, suffer, permit or allow the rate of emissions from the Emergency Generator (Source Code EN01) any gases which contain emissions in total quantities exceeding the allowable rate as indicated below:
[40 CFR 60.4233(e) and Table 1 of 40 CFR 60 Subpart JJJJ]
- a. NO_x emissions in excess of 2.0 g/HP-hr or 160 ppmvd at 15% oxygen
 - b. CO emissions in excess of 4.0 g/HP-hr or 540 ppmvd at 15% oxygen
 - c. VOC emissions in excess of 1.0 g/HP-hr or 86 ppmvd at 15% oxygen

The Permittee may choose to comply with the emission standards in units of either g/HP-hr or ppmvd at 15 percent oxygen.

- 2.8 For the Emergency Generator (Source Code EN01), maintenance and readiness testing shall not exceed 100 hours per year.
[40 CFR 60.4243(d)]
- 2.9 For the Emergency Generator (Source Code EN01), non-emergency operation of the emergency generator is limited to 50 hours per year, which are counted towards the 100 hours/year for maintenance and readiness testing. The non-emergency operation shall not include peak shaving or to generate income for the compressor station from supplying power to an electric grid or otherwise supply power as part of a financial arrangement with another entity.
[40 CFR 60.4243(d)]

Fuel Gas Heaters

- 2.10 The Permittee shall not cause, let, suffer, permit, or allow any emissions from Fuel Gas Heaters 1 and 2 (Source Codes FH01 and FH02) which:
- a. Contain fly ash and/or other particulate matter in amounts equal to or exceeding 0.5 pounds per million BTU heat input.
[391-3-1-.02(2)(d)2.(i)]
 - b. Exhibit visible emissions, the opacity of which is equal to or greater than 20 percent except for one six minute period per hour of not more than 27 percent opacity.
[391-3-1-.02(2)(d)3.]

Other Generally Applicable Requirements

- 2.11 The Permittee shall not cause, let, suffer, permit or allow emissions from Combustion Turbines 1 and 2 (Source Codes CT01 and CT02) and the Emergency Generator (Source Code EN01), the opacity of which is equal to or greater than forty (40) percent.
[391-3-1-.02(2)(b)]

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- 2.12 The Permittee shall not combust, in Combustion Turbines 1 and 2 (Source Codes CT01 and CT02), the Emergency Generator (Source Code EN01) or Fuel Gas Heaters 1 and 2 (Source Codes FH01 and FH02), any fuel other than natural gas and such fuel shall not contain sulfur in amounts exceeding 2.5 percent by weight.
[391-3-1-.02(2)(g)]

3. Fugitive Emissions

- 3.1 The Permittee shall take all reasonable precautions with any operation, process, handling, transportation, or storage facilities to prevent fugitive emissions of air contaminants.
[391-3-1-.02(2)(n)]

4. Process & Control Equipment

- 4.1 The Permittee shall operate and maintain Combustion Turbines 1 and 2 (Source Codes CT01 and CT02) in a manner consistent with good air pollution control practices for minimizing emissions at all times including during startup, shutdown and malfunction.
[40 CFR 60.4333(a)]
- 4.2 The Permittee shall install, operate, and maintain oxidation catalyst systems on the exhaust from Combustion Turbines 1 and 2 (Source Codes CT01 and CT02).
[391-3-1-.02(6)(b)1]
- 4.3 The Permittee shall keep a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions.
[40 CFR 60.4243(b)(2)(ii)]
- 4.4 Gas release events are allowed for routine operations (e.g., startup and shutdown), maintenance, reduced-pressure demand events, other similar events, and emergency conditions. When feasible, the Permittee shall minimize the amount of gas released by proper planning. Gas release events at the compressor station will occur due to periodic blowdown of the new compressors and other events. A gas release event refers to the intentional and unintentional venting of gas for routine operations (e.g., startup and shutdown), maintenance and emergency conditions. The majority of emissions from planned gas release events are associated with startup, shutdown, reduced-pressure demand events and maintenance activities.

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5. Monitoring

5.1 Any continuous monitoring system required by the Division and installed by the Permittee shall be in continuous operation and data recorded during all periods of operation of the affected facility except for continuous monitoring system breakdowns and repairs. Monitoring system response, relating only to calibration checks and zero and span adjustments, shall be measured and recorded during such periods. Maintenance or repair shall be conducted in the most expedient manner to minimize the period during which the system is out of service.

Combustion Turbines

5.2 If the Permittee chooses to demonstrate continuous compliance with the NO_x emissions limit in Condition 2.2 by utilizing continuous parameter monitoring as described in 40 CFR 60.4340(b)(2), the facility must prepare a parameter monitoring plan and submit it to the Division at least 30 days in advance of the commencement of the continuous parameter monitoring.

[40 CFR 60.4355]

5.3 The Permittee shall install, calibrate, maintain, and operate a system to continuously monitor and record the catalyst inlet and outlet temperatures on the oxidation catalysts installed on Combustion Turbines 1 and 2 (Source Codes CT01 and CT02).

Emergency Generator

5.4 The Permittee shall install a non-resettable hour meter on the Emergency Generator (Source Code EN01). The meter reading shall be recorded at least once each month. The Permittee shall also record the monthly hours of operation for maintenance and readiness checks and monthly hours of operation for all non-emergency operations.

[40 CFR 60.4237(a)]

6. Performance Testing

6.1 The Permittee shall cause to be conducted a performance test at any specified emission point when so directed by the Division. The following provisions shall apply with regard to such tests:

a. All tests shall be conducted and data reduced in accordance with applicable procedures and methods specified in the Division's Procedures for Testing and Monitoring Sources of Air Pollutants.

b. All test results shall be submitted to the Division within sixty (60) days of the completion of testing.

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- c. The Permittee shall provide the Division thirty (30) days prior written notice of the date of any performance test(s) to afford the Division the opportunity to witness and/or audit the test, and shall provide with the notification a test plan in accordance with Division guidelines.
- d. All monitoring systems and/or monitoring devices required by the Division shall be installed, calibrated and operational prior to conducting any performance test(s). For any performance test, the Permittee shall, using the monitoring systems and/or monitoring devices, acquire data during each performance test run. All monitoring system and/or monitoring device data acquired during the performance testing shall be submitted with the performance test results.

Combustion Turbines

6.2 Within 60 days after reaching the maximum capacity at which Combustion Turbines 1 and 2 (Source Codes CT01 and CT02) will be operated, but not later than 180 days after the initial startup of each compressor turbine, the Permittee shall conduct performance testing on the compressor turbine to determine compliance with the NO_x emission limits contained in Conditions 2.2 and 2.4.

[40 CFR 60.4400(a)]

6.3 Following the performance test required by Condition 6.2, subsequent performance tests for NO_x from Combustion Turbines 1 and 2 (Source Codes CT01 and CT02) shall be conducted annually (no more than 14 calendar months following the previous performance tests), unless the NO_x emission result from the most recent performance test is less than 75 percent of the NO_x emission limits for the compressor turbine in Conditions 2.2 and 2.4, in which case, the frequency of subsequent NO_x performance testing can be reduced to once every two years (no more than 26 months following the last performance test). If the result of any subsequent NO_x performance test exceeds 75 percent of the NO_x emission limit for the compressor turbine, the Permittee must resume annual performance testing for NO_x.

This condition shall not apply if the Permittee chooses to demonstrate continuous compliance with the NO_x limits in Condition 2.2 and 2.4 by utilizing continuous parameter monitoring as described in 40 CFR 60.4340(b)(2) and complies with the requirements of Condition 5.2.

[40 CFR 60.4400(a) and 40 CFR 60.4340(a)]

6.4 The NO_x performance tests for Combustion Turbines 1 and 2 (Source Codes CT01 and CT02) required by Conditions 6.2 and 6.3 shall be conducted in accordance with 40 CFR 60.4400 using Method 20 or Method 7E in combination with Method 3A. The performance test must be done at any load condition within plus or minus 25 percent of 100 percent of peak load. The Permittee may perform testing at the highest achievable load point, if at least 75 percent of peak load cannot be achieved in practice. The Permittee must conduct three separate test runs for each performance test. The minimum time per run is 20 minutes.

[40 CFR 60.4400]

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- 6.5 The Permittee shall comply with the sulfur testing requirements specified in §60.4415.
[40 CFR 60.4415(a)]
- 6.6 The Permittee shall conduct performance testing for carbon monoxide (CO) on Compressor Turbines 1 and 2 (Source Codes CT01 and CT02) during any NO_x performance test required by Conditions 6.2 or 6.3.

Emergency Generators

- 6.7 The Permittee shall conduct performance tests for nitrogen oxides, carbon monoxide and volatile organic compounds emissions from the Emergency Generator (Source Code EN01) to demonstrate compliance with the emission limits in Condition 2.7. Performance tests shall be conducted on the engines at the maximum operating load point and per the requirements of 40 CFR 60.4244. The performance tests shall be conducted within 60 days after achieving the maximum production rate at which the Emergency Generator (Source Code EN01) will be operated, but not later than 180 days after initial startup of the engines.
[40 CFR 60.4243(b)(2)(i)]
- 6.8 Following the performance tests required by Condition 6.7, the Permittee shall conduct subsequent performance testing on the Emergency Generator (Source Code EN01) every 8,760 operating hours or 3 years, whichever comes first, to demonstrate compliance with the emission limits in Condition 2.7.

7. Notification, Reporting and Record Keeping Requirements

- 7.1 The Permittee shall maintain files of all required measurements, including continuous monitoring systems, monitoring devices, and performance testing measurements; all continuous monitoring system or monitoring device calibration checks; and adjustments and maintenance performed on these systems or devices. These files shall be kept in a permanent form suitable for inspection and shall be maintained for a period of at least five (5) years following the date of such measurements, reports, maintenance and records.

Combustion Turbines

- 7.2 The Permittee shall submit to the Division the fuel quality characteristics in a current, valid purchase contract, tariff sheet or transportation contract for the natural gas, specifying that the total sulfur content for natural gas is 20 grains of sulfur or less per 100 scf and has potential sulfur emissions equal to or less than 0.060 lb SO₂ per MMBtu of heat input. This report shall be postmarked by February 28 of each calendar year.
[40 CFR 60.4365]

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- 7.3 The Permittee shall submit to the Division a semiannual report for each semiannual period ending June 30 and December 31. The report shall be postmarked by August 29 and February 28 following the end of each semiannual period. The report shall contain all 3-consecutive hour periods when the temperature monitoring devices required by Condition 5.3 did not show a temperature increase from the inlet to the outlet of the oxidation catalyst for Combustion Turbines 1 and 2 (CT01 and CT02). If there are no such 3-consecutive hour periods, the report shall so state.

Emergency Generator

- 7.4 For the Emergency Generator (Source Code EN01), the Permittee shall submit any calendar year hours of operation for all non-emergency operation which exceeds 100 hours, as per Condition 2.8 and any calendar year month hours of operation for non-emergency operation (excluding time spent for maintenance and readiness testing) which exceeds 50 hours per year, as per Condition 2.9. This report shall be postmarked by February 28 of each calendar year.

[40 CFR 60.4243(d)]

- 7.5 The Permittee shall maintain records of the following information for the Emergency Generator (Source Code EN01):

[40 CFR 60.4245(a)]

- a. All notifications submitted to comply with 40 CFR 60 Subpart JJJJ and all documentation supporting any notification.
- b. Maintenance conducted on the engines.
- c. Documentation that each engine meets the emission standards.

- 7.6 The Permittee shall maintain a written or electronic log of the gas release events. For each gas release event, the Permittee shall identify the date, time, reason for the release, approximate duration of the release and estimated quantity of gas released. This information shall be used when estimating emissions and for future planning.

8. Special Conditions

- 8.1 At any time that the Division determines that additional control of emissions from the facility may reasonably be needed to provide for the continued protection of public health, safety and welfare, the Division reserves the right to amend the provisions of this Permit pursuant to the Division's authority as established in the Georgia Air Quality Act and the rules adopted pursuant to that Act.

- 8.2 The Permittee shall calculate and pay an annual Permit fee to the Division. The amount of the fee shall be determined each year in accordance with the "Procedures for Calculating Air Permit Fees."