

Facility Name: **Atlanta Gas Light Company – Macon LNG Plant**  
City: Macon  
County: Jones  
AIRS #: 04-13-169-00010

Application #: TV-540566  
Date Application Received: August 19, 2021  
Permit No: 4924-169-0010-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:**

Atlanta Gas Light Company – Macon LNG Plant

**2. Parent/Holding Company Name**

Atlanta Gas Light Company

**3. Previous and/or Other Name(s)**

Macon LNG Plant/

**4. Facility Location**

258 Henderson Road  
Macon, Georgia 31217

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

Atlanta Gas Light – Macon LNG Plant is located in Jones County, which is in attainment for all criteria pollutants.

**B. Site Determination**

There are no other facilities which could be considered 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
4924-169-0010-V-04-0	February 22, 2017	Initial Title V permit
4924-169-0010-V-04-1	October 6, 2020	New emergency generator to power fire pumps
4924-169-0010-V-04-2	December 3, 2020	New 729 hp compressor engine

## D. Process Description

### 1. SIC Codes(s)

#### 4924 – Natural Gas Distribution

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)

Atlanta Gas Light – Macon LNG Plant is a liquefied natural gas storage facility and does not produce a “product”.

### 3. Overall Facility Process Description

The primary function of the Facility is to provide natural gas to the pipeline distribution system during periods of peak demand (i.e. peakshaving), during which time the plant operates in vaporization mode. When consumer demand for natural gas exceeds supply from the interstate pipeline system, liquefied natural gas (LNG) can be pumped from storage tanks, vaporized, and injected into the distribution system. At the Macon plant, three electrical pumps deliver LNG to the vaporizers that heat the LNG to a nominal pipeline send out temperature of 60°F. Natural gas-fired vaporizer heaters heat a glycol/water solution as the heat exchange fluid. At the Macon facility, three natural gas-fired vaporizer heaters are used (Emission Unit IDs: VH1 - VH3), and each unit has a heat input capacity of 54.6 MMBtu/hr. The heat exchange fluid is brought into indirect contact with the LNG to change the phase from liquid to gas and raise the gas temperature to pipeline conditions. During periods of lower natural gas demand, natural gas from the interstate pipeline is processed into a liquid for storage. Typically, intermittent vaporization of LNG occurs in colder winter months.

The secondary function of the facility is liquefaction and storage of natural gas, during which time the plant operates in liquefaction mode. Natural gas received from an interstate transmission pipeline is cooled and converted into a liquid phase through indirect contact with a mixed hydrocarbon refrigerant typically consisting of ethylene, isobutane, and propane. At the Macon facility, a 63.21 MMBtu/hr natural gas-fired turbine (Emission Unit ID: T1) is used to compress the refrigerant gases before being fed to a series of heat exchangers in the “cold box” to refrigerate the vapor-phase natural gas below its boiling point at –260 °F and into the liquid phase.

LNG is stored in large storage tanks. In liquid phase, natural gas is stored at a volume reduction of about 600 times its volume in vapor phase, such that the plant can store the equivalent of approximately 2.5 billion cubic feet of natural gas. LNG storage tanks are essentially unpressurized, and natural gas vapor accumulates at the top of the tank when the tank temperature rises above the gas boiling point. Boil-off gas (BOG) compressors draw this vapor from the tank and compress the gas to the appropriate pressure for injection into the distribution system. At the facility, a 6.61 MMBtu/hr natural gas-fired RICE (Emission Unit ID: C3) drive these compressors. The compressor engine is utilized essentially at all times since boil-off gases continuously accumulate when LNG is stored. Accordingly, AGLC operates non-selective catalytic reduction (NSCR) systems on the unit to minimize emission of NO<sub>x</sub> and CO. Liquefaction of natural gas for storage generally occurs periodically throughout the year except during colder winter months.

The facility also operates several combustion sources for auxiliary purposes that are permitted as emissions sources. These include gas-fired RICE and small boilers that serve utility purposes for the plant. Currently, the facility operates three 8.73 MMBtu/hr natural gas-fired RICE (Emission Unit IDs: G3, G4 and G5) to generate baseload electricity for on-site consumption at the Macon plant. These generators are utilized during peakshaving operations to ensure a reliable power supply for pumps and compressors during liquefaction or vaporization. A 5.45 MMBtu/hr natural gas-fired spark ignition (SI) internal combustion engine (Emission Unit ID: EG1) is also on-site that is used for emergency purposes only.

4. Overall Process Flow Diagram

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

E. Regulatory Status

1. PSD/NSR

Atlanta Gas Light – Macon LNG Plant is a minor source with respect to PSD/NSR regulations. Emissions of each PSD regulated pollutant is less than the major source threshold of 250 tons per year. Liquified natural gas storage facilities are not included in the list of 28 source categories that have a 100 tpy threshold to be subject to PSD regulations.

NO<sub>x</sub> emissions from the vaporizer heaters (VH1 through VH3) and the generator engines (G3 through G5) are limited to the Georgia Rule (III) and Rule (mmm) levels year-round so that potential NO<sub>x</sub> emissions are less than 250 tons per year (Conditions 3.4.5 and 3.4.6). Additionally, NSCR systems are required on the generator engines (G3 through G5) year-round to reduce NO<sub>x</sub> emissions (Condition 3.2.1).

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	Yes			✓
PM <sub>10</sub>	Yes			✓
PM <sub>2.5</sub>	Yes			✓
SO <sub>2</sub>	Yes			✓
VOC	Yes			✓
NO <sub>x</sub>	Yes	✓		
CO	Yes	✓		
TRS				
H <sub>2</sub> S				
Individual HAP	Yes			✓
Total HAPs	Yes			✓

### 3. MACT Standards

40 CFR 63 Subpart ZZZZ – “National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines”

Subpart ZZZZ regulates emissions from reciprocating internal combustion engines at major and area sources of HAPs. This facility is an area source of HAP emissions. Generator Engines Nos. 3 through 5 meet the definition of “remote stationary RICE”. These remote stationary RICE comply with this rule by conducting required periodic maintenance. On an annual basis, the owner of the engines is required to verify that the engines still meet the definition of remote stationary RICE. The other engines were constructed after June 12, 2006, and are considered “new” engines. New engines at an area source of HAP emissions comply with Subpart ZZZZ by complying with 40 CFR 60 Subpart JJJJ.

### 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

The company did not indicate any noncompliance issues in its application.

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
VH1	Vaporizer Heater No. 1 54.6 x 10 <sup>6</sup> Btu/hr	40 CFR 60, Subpart A 40 CFR 60, Subpart Dc 391-3-1-.02(2)(d) 391-3-1-.02(2)(g) 391-3-1-.02(2)(III)	None	N/A
VH2	Vaporizer Heater No. 2 54.6 x 10 <sup>6</sup> Btu/hr	40 CFR 60, Subpart A 40 CFR 60, Subpart Dc 391-3-1-.02(2)(d) 391-3-1-.02(2)(g) 391-3-1-.02(2)(III)	None	N/A
VH3	Vaporizer Heater No. 3 54.6 x 10 <sup>6</sup> Btu/hr	40 CFR 60, Subpart A 40 CFR 60, Subpart Dc 391-3-1-.02(2)(d) 391-3-1-.02(2)(g) 391-3-1-.02(2)(III)	None	N/A
T1	Turbine Compressor No. 1 63.31 x 10 <sup>6</sup> Btu/hr	40 CFR 60, Subpart A 40 CFR 60, Subpart GG 391-3-1-.02(2)(b) 391-3-1-.02(2)(g)	None	N/A

Emission Units		Applicable Requirements/Standards	Air Pollution Control Devices	
ID No.	Description		ID No.	Description
G3	Generator Engine No. 3 1,035 hp	40 CFR 63, Subpart A 40 CFR 63, Subpart ZZZZ 40 CFR 64 391-3-1-.02(2)(b) 391-3-1-.02(2)(g) 391-3-1-.02(2)(mmm)	G3C	Non-Selective Catalytic Reduction (NSCR)
G4	Generator Engine No. 4 1,035 hp	40 CFR 63, Subpart A 40 CFR 63, Subpart ZZZZ 40 CFR 64 391-3-1-.02(2)(b) 391-3-1-.02(2)(g) 391-3-1-.02(2)(mmm)	G4C	Non-Selective Catalytic Reduction (NSCR)
G5	Generator Engine No. 5 1,035 hp	40 CFR 63, Subpart A 40 CFR 63, Subpart ZZZZ 40 CFR 64 391-3-1-.02(2)(b) 391-3-1-.02(2)(g) 391-3-1-.02(2)(mmm)	G5C	Non-Selective Catalytic Reduction (NSCR)
C3	Compressor Engine No. 3 729 hp	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)	G8C	Non-Selective Catalytic Reduction (NSCR)
EG1	Natural Gas-fired Emergency Generator 755 hp	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) 391-3-1-.02(2)(mmm)	EG1C	Oxidation Catalyst

## B. Equipment & Rule Applicability

### Emission and Operating Caps:

As noted earlier, the NSCR system is required to be operated on the generator engines (G3 through G5) at all times to reduce NOx emissions and avoid PSD requirements.

The emergency generator (EG1) is limited to 200 hours per 12-month period so that the emergency generator will not be subject to Georgia Rule (mmm).

### Rules and Regulations Assessment:

40 CFR 60 Subpart Dc – “Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units”

Subpart Dc applies to steam generating units which were constructed after June 9, 1989, that have a maximum design heat input rate between 10 and 100 MMBtu/hr. The vaporizer heaters

(VH1, VH2, and VH3) are subject to this rule. Because these heaters fire only natural gas, they are not subject to any emission limits due to this rule. For boilers that only fire natural gas, Subpart Dc requires daily monitoring of fuel consumption. U.S. EPA, however, has approved monthly fuel consumption monitoring for this type of boiler.

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

Subpart GG applies to stationary gas turbines constructed after October 3, 1977 with a heat input at peak load equal to or greater than 10 MMBtu/hr. The turbine compressor (T1) is subject to this rule. This rule limits NO<sub>x</sub> emissions and the sulfur content of the fuel burned.

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

Subpart JJJJ regulates emissions from spark ignition internal combustion engines where construction commences after June 12, 2006, and, for emergency generators, where the engine is manufactured on or after January 1, 2009. The compressor engine (C3) and emergency generator (EG1) were constructed after these dates and are, therefore, subject to Subpart JJJJ. None of the other engines at this facility are subject to Subpart JJJJ.

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

Subpart KKKK regulates emissions from combustion turbines constructed after February 18, 2005. The turbine compressor was built before this date. This rule, therefore, does not apply.

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

Subpart YYYY regulates emissions from stationary combustion turbines at a major source of HAPs for which construction commenced after January 14, 2003. This facility is an area source for HAPs. This rule, therefore, does not apply.

40 CFR 63 Subpart ZZZZ – “National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines”

Subpart ZZZZ regulates emissions from reciprocating internal combustion engines at major and area sources of HAPs. This facility is an area source of HAP emissions. Generator Engines Nos. 3 through 5 meet the definition of “remote stationary RICE”. These remote stationary RICE comply with this rule by conducting required periodic maintenance. On an annual basis, the owner of the engines is required to verify that the engines still meet the definition of remote stationary RICE. The other engines were constructed after June 12, 2006, and are considered “new” engines. New engines at an area source of HAP emissions comply with Subpart ZZZZ by complying with 40 CFR 60 Subpart JJJJ. [40 CFR 63.6590(c)]

40 CFR 63 Subpart DDDDD – “National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters”

Subpart DDDDD (Boiler MACT) regulates emissions from boilers located at a major source of HAP emissions. This facility is not a major source of HAP emissions, so this rule does not apply.

40 CFR 63 Subpart JJJJJ – “National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources”

Subpart JJJJJ (Boiler GACT) regulates emissions from boilers located at an area source of HAP emissions. The Boiler GACT lists specific classes of boilers that are not subject to this subpart in 40 CFR 63.11195 including gas-fired boilers in paragraph (e). Because the boilers meet the definition of gas-fired boiler, this rule does not apply.

Georgia Rule 391-3-1-.02(2)(b) – “Visible Emissions”

Rule (b) limits the opacity of visible emissions from any air contaminant source that is subject to some other emission limitation under 391-3-1-.02(2). The opacity of visible emissions from regulated sources may not exceed 40 percent under this general visible emission standard.

Georgia Rule 391-3-1-.02(2)(d) – “Fuel-Burning Equipment”

Rule (d) limits emission of particulate matter from sources that meet the definition of “fuel-burning equipment”. The vaporizer heaters (VH1, VH2, and VH3) meet this definition and are, therefore, subject to Rule (d). Rule (d) also limits the opacity of emissions from the boilers to 20 percent except for one six-minute period per hour of not more than 27 percent opacity. Because the boilers will only combust natural gas, compliance with both the PM and opacity limits will easily be achieved.

Georgia Rule 391-3-1-.02(2)(g) – “Sulfur Dioxide”

Rule (g) applies to all “fuel burning” sources. This rule limits the sulfur content of fuel burned in all fuel burning sources. The only fuel burned at this facility is natural gas which inherently have low sulfur content.

Georgia Rule 391-3-1-.02(2)(lll) – “NO<sub>x</sub> Emissions From Fuel-Burning Equipment”

Rule (lll) applies to fuel-burning equipment located in the area around Atlanta and a zone-of-influence area that includes Jones County. To be subject to this rule, the fuel-burning equipment must be installed or modified after May 1, 1999, and have a maximum design heat input capacity of greater than or equal to 10 MMBtu/hr. The vaporizer heaters (VH1, VH2, and VH3) meet this definition and are subject to this rule.

Georgia Rule 391-3-1-.02(2)(mmm) – “NO<sub>x</sub> Emissions from Stationary Gas Turbines and Stationary Engines used to Generate Electricity”

Rule (mmm) applies to stationary engines used to generate electricity whose nameplate capacity is between 100 kilowatts (kW) and 25 megawatts (MW) located in the area around Atlanta and a zone-of-influence area that includes Jones County. The generator engines (G3, G4, and G5) are

subject to this rule. The emergency generator (EG1) is limited to less than 200 hours per 12-month period and is, therefore, not subject to Rule (mmm). [391-3-1-.02(2)(mmm)7.] The other engines and the turbine compressor are not used to generate electricity and, therefore, are not subject to this rule.

Georgia Rule 391-3-1-.02(2)(rrr) – “NOx Emissions from Small Fuel-Burning Equipment”

Rule (rrr) applies to fuel-burning equipment located in the area around Atlanta. For this rule, however, the zone-of-influence does not include Jones County. This rule, therefore, does not apply.

C. Permit Conditions

Condition 3.2.1 (Condition 3.2.3 in Permit 4924-169-0010-V-04-0) requires NSCR for engines G3, G4, and G5 due to Georgia Rule (mmm) and to avoid being a major source under the PSD regulations.

Condition 3.2.2 (Condition 3.2.4 in Permit 4924-169-0010-V-04-1) limits operation of the emergency generator (EG1) to 200 hours per 12-month period so that the engine is not subject to Georgia Rule (mmm)

Condition 3.3.1 (Condition 3.3.1 in Permit 4924-169-0010-V-04-0) contains NSPS Subparts A and Dc requirements for the boilers VH1, VH2, and VH3.

Conditions 3.3.2 through 3.3.4 (Conditions 3.3.2 through 3.3.4 in Permit 4924-169-0010-V-04-0) contain NSPS Subparts A and GG requirements for the turbine T1. Condition 3.3.3 limits the NOx emissions, and Condition 3.3.4 limits the sulfur content of the fuel burned.

Conditions 3.3.5 through 3.3.9 (Conditions 3.3.13 through 3.3.16 in Permit 4924-169-0010-V-04-1 and Condition 3.3.18 through 3.3.20 in Permit 4924-169-0010-V-04-2) contain the NSPS Subparts A and JJJJ requirements for the emergency generator (EG1) and compressor engine (C3). Conditions 3.3.6 and 3.3.7 contain the emission limits for NOx, CO, and VOC. Condition 3.3.8 requires the engines be operated to minimize emissions. Condition 3.3.9 limits the time of operation for the emergency generator.

Conditions 3.3.10 through 3.3.14 (Conditions 3.3.5 and 3.3.9 in Permit 4924-169-0010-V-04-0 and Conditions 3.3.10 through 3.3.12 in Permit 4924-169-0010-V-04-1) contain MACT Subparts A and ZZZZ requirements for the engines. Conditions 3.3.11 through Condition 3.3.13 contain the maintenance and operating requirements for the generator engines (G3, G4, G5). Condition 3.3.14 allows for oil analysis program to reduce the frequency of some of the maintenance required in Condition 3.3.12.

Condition 3.4.1 (Condition 3.4.1 in Permit 4924-169-0010-V-04-0) contains the Georgia Rule (b) requirements.

Conditions 3.4.2 and 3.4.3 (Conditions 3.4.2 and 3.4.3 in Permit 4924-169-0010-V-04-0 and Condition 3.2.5 in Permit 4924-169-0010-V-04-1) limits the fuels burned and fuel sulfur content due to Georgia Rule (g).

Condition 3.4.4 (Condition 3.4.4 in Permit 4924-169-0010-V-04-0) contains the Georgia Rule (d) requirements for all of the fuel-burning equipment.

Condition 3.4.5 (Condition 3.2.1 Permit 4924-169-0010-V-04-0) limits the NOx emissions from heaters VH1, VH2, and VH3 due to Georgia Rule (lll) and to avoid being a major source under the PSD regulations.

Condition 3.4.6 (Condition 3.2.2 in Permit 4924-169-0010-V-04-0) limits the NOx emissions from the generator engines (G3 through G5) due to Georgia Rule (mmm) and to avoid being a major source under the PSD regulations.

Permit 4924-169-0010-V-04-0 Conditions 3.3.6 through 3.3.8 were deleted by Permit 4924-169-0010-V-04-1. Permit 4924-169-0010-V-04-2 Condition 3.3.21 required compressor engine C2 be shut down after startup of compressor engine C3. Engine C2 has been shut down and this condition is no longer needed.

#### **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**

The facility must conduct annual performance testing on the Turbine Compressor (Source Code T1) to determine compliance with the NOx emission limit of Condition 3.3.3. This requirement is specified in Condition 4.2.1 (Condition 4.2.1 in Permit 4924-169-0010-V-04-0).

Conditions 4.2.2 through 4.2.4 (Conditions 4.2.3 through 4.2.5 in Permit 4924-169-0010-V-04-1 and Condition 4.2.7 through 4.2.9 in Permit 4924-169-0010-V-04-2) include the performance test requirements for the emergency generator (EG1) and the compressor engine (C3), and specify the performance test conditions and reporting requirements.

Permit 4924-169-0010-V-04-1 Condition 4.2.2 and Permit 4924-169-0010-V-04-2 Condition 4.2.6 were initial test requirements which have been completed. These conditions, therefore, are no longer needed.

## **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 (Condition 5.2.2 in Permit 4924-169-0010-V-04-0) requires an annual tune-up of heaters VH1, VH2, and VH3 due to Georgia Rule (III).

Condition 5.2.2 (Condition 5.2.3 in Permit 4924-169-0010-V-04-0) contains requirements for monitoring the sulfur content of the fuel burned in turbine T1 due to NSPS Subpart GG.

Condition 5.2.3 (Condition 5.2.5 in Permit 4924-169-0010-V-04-1) requires an hour meter on the emergency generator (EG1) due to NSPS Subpart JJJJ.

Conditions 5.2.4 through 5.2.6 (Conditions 5.2.6 through 5.2.8 in Permit 4924-169-0010-V-04-0) require monitoring of engines G3, G4, and G5 due to Georgia Rule (mmm). Condition 5.2.4 requires temperature and pressure drop monitoring of the NSCR. Condition 5.2.5 requires NOx to be measured annually. Condition 5.2.6 requires an operation/maintenance plan for the engines and NSCR systems.

Conditions 5.2.7 and 5.2.8 detail the CAM Plan for the generator engines (G3 through G5).

Permit 4924-169-0010-V-04-0 Conditions 5.2.1 and 5.2.4 were reserved so they are not addressed further in this narrative.

### **C. Compliance Assurance Monitoring (CAM)**

Generator Engine Nos. 3 through 5 (G3 through G5) are subject to the CAM Rule for NOx emissions. Temperature at the inlet to the Nonselective Catalytic Reduction (NSCR) system is monitored continuously and recorded at least once every 15 minutes. The temperature data is then reduced to 4-hour rolling averages. Any 4-hour average temperature less than 750 °F or greater than 1,250 °F is an excursion.

## **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**

The facility must monitor fuel usage per 40 CFR 60, Subpart Dc for Heaters VH1, VH2, and VH3. This requirement is included in Condition 6.2.1 (Condition 6.2.1 in Permit 4924-169-0010-V-04-0).

Conditions 6.2.2 and 6.2.3 (Conditions 6.2.2 and 6.2.3 in Permit 4924-169-0010-V-04-1) include records that must be kept for the generator engines (G3 through G5) per the requirements of MACT ZZZZ.

The generator engines (G3 through G5) are exempt from some of the requirements of MACT Subpart ZZZZ because the engines meet the definition of “remote stationary RICE”. Condition 6.2.4 (Condition 6.2.5 in Permit 4924-169-0010-V-04-0) requires that the facility verify that the engines still meet this definition every year.

Condition 6.2.5 (Condition 6.2.6 in Permit 4924-169-0010-V-04-1) requires records of hours of operation for the emergency generator (EG1) to ensure that the engine not exceed its allowed hours of operation.

Condition 6.2.6 (Condition 6.2.7 in Permit 4924-169-0010-V-04-1 and Condition 6.2.8 in Permit 4924-169-0010-V-04-2) require records for the emergency generator (EG1) and the compressor engine (C3) per the requirements of NSPS Subpart JJJJ.

Permit 4924-169-0010-V-04-0 Condition 6.2.4 was deleted by Permit 4924-169-0010-V-04-1.

**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

The standard permit condition pursuant to 40 CFR 82 Subpart F has been included in the Title V permit. The facility has equipment that is subject to Title VI of the 1990 Clean Air Act Amendments.

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.//