Fac	Facility Name:Hartsfield – Jackson Atlanta International Airport City:City:AtlantaCounty:ClaytonAIRS #:04-13-063-00030				
Date Application Received: Au				71215 st 2, 2021 •063-0030-V-05-0	
Program Review Engine		Review Engineer	'S	<b>Review Managers</b>	
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Permitting Program Manager		Stephen Damaske

## 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:

Hartsfield – Jackson Atlanta International Airport

2. Parent/Holding Company Name

City of Atlanta

3. Previous and/or Other Name(s)

This site could also be known as "Hartsfield Airport," "Atlanta Airport," or "Department of Aviation."

4. Facility Location

Department of Aviation 1255 South Loop Road College Park, Georgia 30337 (Clayton County)

Directions: From I-75 South, take the ramp to I-285 West (Birmingham). At Riverdale Road exit, turn right and go approximately 1-1/4 miles and turn right into the airport just past the third set of traffic signal lights. Park in either the North or South Parking Lot System and come to the Department of Aviation offices in the Terminal Atrium, which is located between the North and South Terminals, and between baggage claim and ticketing. Offices are on the top (4th) floor, directly above the clock tower.

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

The facility is located in the Atlanta ozone attainment area.

B. Site Determination

The City of Atlanta owns the Hartsfield – Jackson International Airport (H-JAIA), all of which is located on contiguous property. Most of H-JAIA is located in Clayton County; however, some of it is located in Fulton County. The City leases property to many other parties who may or may not operate stationary sources of air pollution. Some of the large airlines that operate at H-JAIA conduct their own airplane maintenance on site. Since the City of Atlanta does not control the operations of these airlines, it has been deemed that the stationary sources of air pollution operated by these airlines are not part of the same Part 70 site as the stationary sources of air pollution operated by the City of Atlanta. It is believed that this Permit contains all the significant sources that are under the control of the City of Atlanta.

## 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.

Permit/Amendment Number	Date of Issuance	Description
4581-063-0030-V-04-0	2/21/2017	Title V Renewal
4581-063-0030-V-04-1	4/2/2018	Reclassify PSG9 as an emergency generator and revise the equipment description.
4581-063-0030-V-04-2	7/31/2018	Addition of an existing 750 kW diesel-fired emergency generator originally installed in 1985 and a new 750 kW diesel-fired emergency generator at the west parking deck structure
4581-063-0030-V-04-3	Revoked	Revoked by 4581-063-0030-V- 04-4
4581-063-0030-V-04-4	3/13/2020	Addition of six new 5.0 MMBtu/hr Jet-A fuel and natural gas fired boilers and one 750 kW natural gas-fired emergency generator. Decommissioning and removal of Boiler B002 and emergency generators PSG7 and PSG8.
4581-063-0030-V-04-5	10/28/2022	Addition of two new emergency generators to the Permit (Source Codes: EG82 and EG89) and an associated fuel tank (T144) associated with emergency engine E89.

Table 1: Current Title V Permit and Amendments

- D. Process Description
  - 1. SIC Codes(s)

4581

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 does not make a "product." Its function is to operate and maintain the facilities at Hartsfield – Jackson Atlanta International Airport.

3. Overall Facility Process Description

This facility operates and maintains the HJAIA. This includes the operation of boilers to provide hot water, heating and cooling and the operation of several emergency generators in the event of loss of power in buildings.

4. Overall Process Flow Diagram

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

## E. Regulatory Status

## 1. PSD/NSR

Currently, HJAIA is a major source for purposes of attainment New Source Review (NSR).

Historically, HJAIA was classified as a major source for non-attainment NSR because it has the potential to emit more than 25 tpy of NOx in the when Atlanta was classified as nonattainment for ozone. It is also a major source under the PSD regulations because it is one of the 28 named source categories under PSD (fossil fuel-fired boilers with total heat input capacity greater than 250 MMBtu/hr) and potential emissions are greater than 100 tpy for SO<sub>2</sub>. HJAIA became one of the 28 named source categories when they added the fuel burning equipment sources at Concourse E in 1993.

The potential NOx emissions from all the equipment that preceded the Concourse E expansion was greater than 50 tpy making the airport an existing major source at the time of the Concourse E expansion in 1993. The potential NOx emissions from the equipment that was installed as part of the Concourse E expansion were limited below 25 tpy so the expansion would not be subject to NAA/NSR. Since this was an NSR avoidance condition, the potential NOx emissions from the Concourse E expansion will never be allowed to exceed 25 tpy. The NAA/NSR Avoidance window is 1993-1998.

The pre-Concourse E equipment was a major source under PSD because it had the potential to emit more than 250 tpy of SO<sub>2</sub>. To avoid subjection to PSD, the potential SO<sub>2</sub> emissions from the Concourse E expansion were limited below 40 tpy by limiting the amount of fuel oil that may be burned in the boilers. The limit was set low enough so that EPD did not have to consider limiting SO<sub>2</sub> emissions from the IC engines.

The boiler replacement project (November 12, 2003) for the new terminal boilers (SB04, SB05, and SB06) does not trigger PSD for the attainment (criteria) air pollutants because the permit will restrict fuel oil usage to maintain potential  $SO_2$  emissions below 40 tpy. The project does not trigger NAA/NSR for NOx emissions because the permit will restrict NOx emissions below 25 tpy.

Using the current enforceable permit conditions that limit the amount of fuel oil fired per year in B000 and SB00, in addition to regulations limiting the sulfur content in fuel oil, the HJAIA's potential to emit SO<sub>2</sub> is now less than 100 tpy. Therefore, HJAIA is now a synthetic minor source of SO<sub>2</sub>.

2. Title V Major Source Status by Pollutant

	Is the	If emitted, what is the facility's Title V status for the pollutant?			
Pollutant	Pollutant Emitted?	Major Source Status	Major Source Requesting SM Status	Non-Major Source Status	
PM	Y			$\checkmark$	
PM10	Y			$\checkmark$	
PM <sub>2.5</sub>	Y			$\checkmark$	
SO <sub>2</sub>	Y			$\checkmark$	
VOC	Y			$\checkmark$	
NO <sub>x</sub>	Y	$\checkmark$			
СО	Y	$\checkmark$			
TRS	N/A			$\checkmark$	
$H_2S$	N/A			$\checkmark$	
Individual HAP	Y			✓	
Total HAPs	Y			$\checkmark$	

 Table 2: Title V Major Source Status

## 3. MACT Standards

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

4. Program Applicability (AIRS Program Codes)

Program Code	Applicable (y/n)
Program Code 6 - PSD	Ν
Program Code 8 – Part 61 NESHAP	Ν
Program Code 9 - NSPS	Y
Program Code M – Part 63 NESHAP	Y
Program Code V – Title V	Y

### **Regulatory Analysis**

#### II. Facility Wide Requirements

A. Emission and Operating Caps:

None applicable.

B. Applicable Rules and Regulations

Not applicable.

C. Compliance Status

Hartsfield Atlanta International Airport did not report any compliance issues in the application.

D. Permit Conditions

Permit Condition 2.4.1 requires HJAIA to obtain written approval from the Division before they operate any additional emission units whose potential to emit of NOx exceeds 1.0 tpy. This will ensure that an additional emission unit will be in compliance with Georgia Rule (yy) before it is installed.

## III. Regulated Equipment Requirements

A. Equipment List for the Process

Emission Units		Applicable Equipment Group		Equipment Group
ID No.	Description	Requirements/Standards	ID No.	Description
B001	47.4MMBtu/hr Concourse E Boiler #1	40 CFR 60 Subpart A 40 CFR 60 Subpart Dc 391-3-102(2)(d) 391-3-102(2)(g) 391-3-102(2)(yy)	None	B000
B003	22MMBtu/hr Concourse E Boiler #3	40 CFR 60 Subpart A 40 CFR 60 Subpart Dc 391-3-102(2)(d) 391-3-102(2)(g) 391-3-102(2)(yy)	None	B000
B007	6.0 MMBtu/hr Terminal Boiler	391-3-102(2)(d) 391-3-102(2)(g) 391-3-102(2)(rrr)	None	SB01
B008	6.0 MMBtu/hr Terminal Boiler	391-3-102(2)(d) 391-3-102(2)(g) 391-3-102(2)(rrr)	None	SB01
B009	6.0 MMBtu/hr Terminal Boiler	391-3-102(2)(d) 391-3-102(2)(g) 391-3-102(2)(rrr)	None	SB01
B010	6.0 MMBtu/hr Terminal Boiler	391-3-102(2)(d) 391-3-102(2)(g) 391-3-102(2)(rrr)	None	SB01
B011	6.0 MMBtu/hr Terminal Boiler	391-3-102(2)(d) 391-3-102(2)(g) 391-3-102(2)(rrr)	None	SB01
B012	6.0 MMBtu/hr Terminal Boiler	391-3-102(2)(d) 391-3-102(2)(g) 391-3-102(2)(rrr)	None	SB01
SB04	60.5MMBtu/hr Terminal Boiler	391-3-102(2)(d) 391-3-102(2)(g) 391-3-102(2)(lll) 40 CFR 60 Subpart A 40 CFR 60 Subpart Dc	None	SB00
SB05	47.1MMBtu/hr Terminal Boiler	391-3-102(2)(d) 391-3-102(2)(g) 391-3-102(2)(lll) 40 CFR 60 Subpart A 40 CFR 60 Subpart Dc	None	SB00
SB06	47.1MMBtu/hr Terminal Boiler	391-3-102(2)(d) 391-3-102(2)(g) 391-3-102(2)(lll) 40 CFR 60 Subpart A 40 CFR 60 Subpart Dc	None	SB00
PSG1	1,645 hp, Jet A fired Concourse E Emergency Generator #1	391-3-102(2)(b) 391-3-102(2)(g) 391-3-102(2)(mmm) 40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ	None	PSG0
PSG2	1,645 hp, Jet A gas fired Concourse E Emergency Generator #2	391-3-102(2)(b) 391-3-102(2)(g) 391-3-102(2)(mmm) 40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ	None	PSG0

Emission Units		Applicable	Equipment Group	
ID No.	Description	<b>Requirements/Standards</b>	ID No.	Description
PSG3	1,645 hp, Jet A fired Concourse E Emergency Generator #3	391-3-102(2)(b) 391-3-102(2)(g) 391-3-102(2)(mmm) 40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ	None	PSG0
PSG4	1,645 hp, Jet A fired Concourse E Emergency Generator #4	391-3-102(2)(b) 391-3-102(2)(g) 391-3-102(2)(mmm) 40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ	None	PSG0
PSG5	1,645 hp, Jet A fired Concourse E Emergency Generator #5	391-3-102(2)(b) 391-3-102(2)(g) 391-3-102(2)(mmm) 40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ	None	PSG0
PSG6	1,645 hp, Jet A fired Concourse E Emergency Generator #6	391-3-102(2)(b) 391-3-102(2)(g) 391-3-102(2)(mmm) 40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ	None	PSG0
PSG9	1,102 HP, Diesel fired South Airfield Light Vault Emergency Generator	391-3-102(2)(b) 391-3-102(2)(g) 391-3-102(2)(mmm) 40 CFR 60 Subpart A 40 CFR 60 Subpart IIII 40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ	None	PSG0
PG10	1,085 BHP, Natural gas/Propane-fired, emergency generator	391-3-102(2)(b) 391-3-102(2)(g) 391-3-102(2)(mmm) 40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ	None	PSG0

The criteria for source designation of significant emissions unit versus insignificant activities is based upon Permit Condition 2.4.1 which requires the Permittee to seek written approval from the Division **prior** to the operation of **any** stationary source whose potential NOx emissions exceed 1.0 tons per year, except sources listed in Section 3.1 of this Permit.

In Section 3.1 of this permit, Sources in Equipment Group PSG0 were part of the Concourse E expansion, thus limiting NOx emissions from equipment in Equipment Groups PSG0 and B000 below 25 tpy so the expansion would not be subject to NAA/NSR. Since this was an NSR avoidance condition, the potential NOx emissions from the Concourse E expansion will never be allowed to exceed 25 tpy. All equipment included in the Concourse E Expansion Project has been moved to Section 3.1 since it is subject to an avoidance limit.

In Attachment D of this Permit, there is a listing of Insignificant Activities at the facility. All emergency generators in Attachment D have NOx potential to emit less than 1 tpy. The Emergency Generators listed within the Insignificant Activities list have been divided into 2 groups: Equipment Group SEG0 and Equipment Group SEG1. Criteria for the segregation of emergency generators into two distinct groups is based upon applicability of Georgia Rule 391-3-1-.02(2)(mmm) which impacts units greater than or equal to 100 kilowatts (approximately 134 hp) and less than or equal to 25 megawatts (approximately 33,530 hp). Emissions units with a rating less than 134 hp are classified as small emergency generators, thus classified in the SEG0

Equipment Group, while equipment equal to or greater than 134 hp and less than or equal to 33,530 hp and NOx potential to emit less than 1 tpy are classified under the SEG1 Equipment Group.

Boiler B002 which was part of Equipment Group B000 has been removed from the Updated Equipment List, which has no impact on other boilers within the group. Boilers B007 through B012 were added to the equipment list and a new Equipment Group was created for these boilers called SB01. Emergency Generator EG78 meets the definition of a small emergency generator and will be added to Attachment D in the Insignificant Activities List in group SEG1.

<b>Equipment Group</b>	Criteria	Location	<b>Regulatory Applicability</b>
		in Permit	
B000	Concourse E	Section 3.1	Avoidance of NAA/NSR
	Expansion Project (1993)		limit to less than 25 tpy
SB01	Small Boilers, not subject	Section 3.1	Avoidance of NAA/NSR
	to NSPS or NESHAP		limit.
	(2019)		
PSG0	Emergency Generators in	Section 3.1	Avoidance of NAA/NSR
	Concourse E Expansion		limit to less than 25 tpy
	Project (1993)		
SEG0	Emergency Generators	Attachment	Georgia Rule (mmm)
	between 100 kW and	D	
	25MW		
SEG1	Emergency Generators less	Attachment	Classification as small
	than 100 kW	D	generators, not subject to
			Georgia Rule (mmm)

B. Equipment & Rule Applicability

## 40 CFR 63 Subpart JJJJJJ - National Emission Standards for Area Sources: Industrial/Commercial/Institutional Boilers

The facility is an area source for HAP emissions and the boilers are classified as existing. 40 CFR 63 Subpart JJJJJJ is potentially applicable to the HJAIA. However, 40 CFR 63.11195(e) specifically states that gas-fired boilers (liquid fuels only as back up) are not subject to any requirements of Subpart JJJJJJ.

All the boilers at the facility fire natural gas or are dual fired. Currently, HJAIA burns natural gas, but has the capability to burn Jet-A fuel as a backup. Therefore, the boilers meet the definition of gas-fired boilers and are not subject to the area source Boiler MACT. The permit will limit when liquid fuels can be burned in the boilers for Subpart JJJJJJ avoidance.

<u>40 CFR 63 Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for</u> <u>Stationary Reciprocating Internal Combustion Engines</u>

Subpart ZZZZ applies to any stationary internal combustion engine located at a major or area source of HAP. HJAIA has both new and existing stationary RICE at the facility as defined by the rule.

## Engines constructed before June 12, 2006

As defined by §63.6590(a)(1)(iii), a stationary RICE is existing if the facility commenced construction before June 12, 2006. Furthermore, by §63.6590(b)(3)(viii) existing emergency stationary RICE located at area source of HAP emissions are exempt from Subpart ZZZZ.

## Engines constructed on or after June 12, 2006

Emergency stationary RICE constructed on or after June 12, 2006 need to comply with Subpart ZZZZ by complying with either 40 CFR 60 Subpart JJJJ for spark ignition engines or 40 CFR 60 Subpart IIII for compression ignition engines. The emergency engines at HJAIA are all compression ignition RICE, therefore, 40 CFR 60 Subpart IIII will be the compliance requirement.

# <u>40 CFR Part 60 Subpart Dc - "Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units"</u>

This regulation applies to each steam generating unit for which construction, modification, or reconstruction is commenced after June 9, 1989 and that has a maximum design heat input capacity of 29 megawatts (MW) (100 million British Thermal Units per hour) or less, but greater than or equal to 2.9 MW (10 million British Thermal Units per hour).

Boilers in Emission Unit Groups B000 and SB00 are subject to this regulation. Boilers that fire only natural gas, or propane are not subject to the PM or SO<sub>2</sub> emission standards of the regulation.

Because the boilers have the ability to fire fuel oil, NSPS Dc sets a fuel sulfur content limit of 0.5% sulfur by weight and an opacity limit less than or equal to 20%, except for one 6 minute period per hour where opacity cannot exceed 27%.

## <u>40 CFR 60 Subpart IIII–Standards of Performance for Stationary Compression Ignition Internal</u> <u>Combustion Engines</u>

Hartsfield-Jackson Atlanta International Airport has one non-emergency generator (Emission ID: PSG9) and several emergency standby stationary compression ignition ICE in Attachment D manufactured after April 1, 2006, and they are subject to 40 CFR 60 Subpart IIII and are required to meet all applicable requirements under NSPS Subpart IIII.

<u>40 CFR 60 Subpart Ka—Standards of Performance for Storage Vessels for Petroleum Liquids for</u> <u>Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior</u> <u>to July 23, 1984</u>

HJAIA has nine ASTs located at the City Fuel Farm and two located at the International Fuel with capacities greater than 40,000 gallons that store Jet A Fuel and were constructed during the period outlined in NSPS Subpart Kb. However, the tanks are exempt from NSPS Subpart Ka because they are storage vessels that store a petroleum liquid with a Reid vapor pressure less than 1.0 psia and the maximum true vapor pressure is less than 1.0 psia.

<u>40 CFR 60 Subpart Kb-Standards of Performance for Volatile Organic Liquid Storage Vessels</u> Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984

HJAIA has a total of 6 tanks that are subject to this regulation, TK12, TK71, TK72, TK97, TK100 and TK101. TK12, TK71 and TK72 have a storage capacity greater than 151 m<sup>3</sup> (39,830 gal) storing a volatile organic liquid with a maximum true vapor pressure greater than 3.5kPa (0.5 psia), therefore they are subject to the applicable requirements of Subpart Kb and have been updated in Section 3 of the Permit. Tanks with a capacity greater than 19,813 gallons, but less than 39,890 gallons storing a liquid with a maximum true vapor pressure less than 15.0 kPa are exempt from this regulation. TK97, TK100 and TK101 have a capacity of 20,000 gallons each, they store Jet-A fuel which has a true maximum vapor pressure of less than 15.0kPa, therefore they are not subject to NSPS Subpart Kb.

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

This rule limits opacity to 40 percent from any air contaminant source, except as provided in other more restrictive or specific rules or subdivisions of the regulation. All of the permitted sources are subject to this regulation.

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

This rule regulates the sulfur content of fuel. For a fuel burning source with a heat input capacity less than 100 MMBTU/hr, the regulation limits the fuel sulfur content to less than 2.5 percent, by weight. The generators burn fossil fuel, thus making the equipment subject to this regulation.

## Georgia Rule 391-3-1-.02(2)(yy) – Emissions of Nitrogen Oxides from Major Sources

This rule applies prohibits the emission of nitrogen oxides from any source to exceed 25 tons-peryear for all sources located in Cherokee, Clayton, Cobb, Coweta, DeKalb, Douglas, Fayette, Forsyth, Fulton, Gwinnett, Henry, Paulding and Rockdale counties unless the source has been approved by the Director as meeting the appropriate requirement for all reasonably available control technology (RACT). All NOx sources in operation in or on April 1, 2004 with the potential for NOx emissions to exceed 50 tpy are subject to this regulation. HJAIA is located within Clayton County , and boilers B001, B002 and B003 were in operation prior to April 1, 2004, therefore they are subject to this rule.

## Georgia Rule 391-3-1-.02(2)(lll) – Fuel-burning Equipment

This regulation limits NOx Emissions from fuel burning located in the 13-county nonattainment area with heat input capacity equal to or greater than 10 MMBTU/hr and less than or equal to 250 MM BTU/hr and installed or modified on or after May 1, 1999 to 30 ppm @ 3%  $O_2$ , dry basis. This requirement shall apply during the period of May 1<sup>st</sup> through September 30 of each year.

This regulation applies to boilers SB4, SB5 and SB6 due to the heat input capacity being greater than 10 MMBTU/hr and they were constructed in 2004. This does not apply to boilers B001, B002 and B003 because they were constructed prior to May 1, 1999.

## <u>Georgia Rule 391-3-1-.02(2)(mmm)- NOx Emissions from Stationary Gas Turbines and</u> <u>Stationary Engines used to Generate Electricity.</u>

HJAIA has several emergency generators in Groups SEG0 and PSG0 that meet the definition of an emergency standby stationary engine stated in paragraph 4(i) of the Rule and are required to comply with the definition in order to be classified as an emergency standby stationary engine.

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

This regulation requires an annual tune-up of each affected unit to be performed no earlier than February 1 and no later than May 1 in accordance with manufacturer's settings for fuel burning equipment that fires only natural gas, LPG, or propane during ozone season except during periods of natural gas curtailment. The units must meet the following requirements to be subject to Georgia Rule (rrr):

- 1. Is located in a facility having combined emissions from all emission sources greater than 25 tpy in Cherokee, Clayton, Cobb, Coweta, DeKalb, Douglas, Fayette, Forsyth, Fulton, Gwinnett, Henry, Paulding or Rockdale counties or 100 tons per year in Barrow, Bartow, Carroll, Hall, Newton, Spalding, or Walton County.
- 2. Has potential emissions from each fuel burning equipment of NOx equal to or exceeding 1.0 tpy.
- 3. Installed on or after May 1, 1999 and has a maximum design heat input capacity of less than 10MMBtu/hr.
- 4. Is not subject to Georgia Rule (jjj) or (lll).

The boilers in Equipment Group SB01 meet all of the requirements, therefore they are subject to Georgia Rule (rrr). Because the boilers are subject to Georgia Rule (rrr), they are not subject to Georgia Rule (yy) unless they elect to demonstrate compliance with Georgia Rule (yy).

## C. Permit Conditions

Permit Condition 3.2.1 limits the amount of Jet A fuel fired in the boilers in Equipment Group B001 not to exceed 500,000 gallons during any 12 consecutive months.

Permit Condition 3.2.2 limits NOx emissions from Equipment Groups B000 and PSG0 to 24.9 tpy.

Permit Condition 3.2.3 prohibits the Permittee from firing any fuel other than natural gas or Jet A fuel in any B000 source.

Permit Condition 3.2.4 restricts the Permittee from firing any fuel other than Jet A fuel or #2 fuel oil in any source in Equipment Group PSG0 with the exception of PG10 in that is permitted to fire natural gas or propane exclusively.

Permit Condition 3.2.5 prohibits the Permittee from firing any fuel other than natural gas or Jet A fuel in any SB00 and SB01 source.

Permit Condition 3.2.6 limits consumption of Jet A fuel in boiler SB04 during any twelve consecutive month period to 185,750 gallons.

Permit Condition 3.2.7 limits consumption of Jet A fuel in boiler SB05 during any twelve consecutive month period to 144,500 gallons.

Permit Condition 3.2.8 limits consumption of Jet A fuel in boiler SB06 during any twelve consecutive month period to 144,500 gallons

Permit Condition 3.2.9 prohibits the Permittee from firing any Jet A fuel in any SB00 source that has a sulfur content greater than 0.3 weight percent sulfur.

Permit Condition 3.2.10 prohibits the Permittee from firing any Jet A fuel in any SB00 source during ozone season (May 1 through September 30).

Permit Condition 3.2.11 limits NOx emissions from Equipment Group SB00 to less than 25 tons during any 12 consecutive months.

Permit Condition 3.2.12 limits the firing of Jet A fuel in the Boilers from Equipment Group SB01 to less than 1,000,000 gallons burned during any 12 consecutive month period.

Permit Condition 3.2.13 prohibits the Permittee from firing Jet A fuel in boilers in Equipment Group SB01 that contains greater than 0.3 weight percent sulfur.

Permit Condition 3.3.1 requires the Permittee to comply with all applicable provisions of NSPS Subpart Dc for the operation of the boilers in Equipment Groups SB00 and B000.

Permit Condition 3.3.2 establishes opacity limits under NSPS Subpart Dc and Georgia Rule (d) for the boilers in Equipment Groups SB00 and B000.

Permit Condition 3.3.3 limits the sulfur content of Jet Fuel A used in boilers in Equipment Groups B000 to 0.5 weight percent sulfur or less.

Permit Condition 3.3.4 addresses applicability of NSPS Subpart A and Subpart IIII for generators PSG9.

Permit Condition 3.3.5 restricts operation of PSG9 to that specifically stated by the manufacturer.

Permit Condition 3.3.6 limits the sulfur content, methane content, and aromatic content of fuel used in PSG9.

Permit Condition 3.3.7 prohibits the Permittee from discharging visible emissions in which the opacity is greater than 20% during accelerations or greater than 15% during lugging or greater than 50% during breaks in either the acceleration or lugging modes.

Permit Condition 3.3.8 requires the Permittee to comply with applicable provisions of 40 CFR 63 Subpart A - "General Provisions" and 40 CFR 63 Subpart ZZZZ - "National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines," for the operation of generators in PSG0 and NEG0. Non-Emergency generator PSG9 will comply with 40 CFR 63 Subpart ZZZZ by meeting the requirements in 40 CFR 60 Subpart IIII [40 CFR 63.6590(c)].

Permit Condition 3.3.9 requires the Permittee to only burn natural gas in the boilers except during approved circumstances where fuel oil can be burned in avoidance with 40 CFR 63 Subpart JJJJJJ.

Permit Condition 3.4.1 limits PM emissions from boilers in Equipment Group SB00 and B000 under Georgia Rule (d).

Permit Condition 3.4.2 limits the sulfur content of the fuel oil to 2.5% in Equipment Group PSG0 or SB01.

Permit Condition 3.4.3 limits visible emissions from Equipment Groups SEG0, SEG1, or PSG0 to 40 percent opacity.

Permit Condition 3.4.4 prohibits the Permittee from discharging any gases which contain NOx in excess of 30 ppm corrected to 3 percent oxygen from each boiler in Equipment Group SB00. The condition applies from May 1 through September 30 of each year.

Permit Condition 3.4.5 defines the Georgia Rule (mmm) requirements for each IC engine if HJAIA chooses to use these engines for non-emergency purposes.

Old Permit Conditions 3.4.6 and 3.4.7 were removed in Permit Amendment 4581-063-0030-V-04-1 and subsequent permit conditions were numbered to reflect the change.

Old Permit Condition 3.4.8 became New Permit Condition 3.4.6 which states that the Permittee shall only fire distillate fuel oil in generator PSG9.

Old Permit Condition 3.4.9 was removed in Permit Amendment 4581-063-0030-V-04-1 and subsequent permit conditions were numbered to reflect the change.

Old Permit Conditions 3.4.10 through 3.4.12 were renumbered as New Permit Conditions 3.4.7 through 3.4.9 which outline the required provisions of Georgia Rule (yy) for boilers in Equipment Group B000.

Old Permit Condition 3.4.13 became New Permit Condition 3.4.10 which limits the operation of any emergency generator at this facility to less than 200 hours per year in accordance with Georgia Rule (mmm).

In Permit Amendment 4581-063-0030-V-04-4, Permit Conditions 3.4.14 and 3.4.15 were added to subject Equipment Group SB01 to the PM and opacity limits of Georgia Rule (d). These conditions have been renumbered as Permit Conditions 3.4.11 and 3.4.12.

In Permit Amendment 4581-063-0030-V-04-4, Permit Conditions 3.4.16 and 3.4.17 were added to outline the requirements under Georgia Rule (rrr) for Equipment Group SB01. These conditions have been renumbered as Permit Conditions 3.4.13 and 3.4.14.

### **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

Not applicable.

## 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

Permit Condition 5.2.1 requires the Permittee to monitor NOx emissions from each boiler, SB04, SB05 and SB06 in accordance with the outlined protocol.

Permit Condition 5.2.2 requires the Permittee to monitor Jet A fuel and natural gas consumption via meter and recorded to ensure accurate monthly consumption totals.

Old Permit Conditions 5.2.3 through 5.2.6 were removed from the permit, subsequent conditions have been renumbered.

Old Permit Condition 5.2.7 which has become New Permit Condition 5.2.3 requires the installation, maintenance, calibration and operation of a non-resettable hour meter to continuously record the cumulative total hours of operation during all periods of operation for generators in Equipment Groups in Equipment Groups PSG0 and generators in Attachment D. The data must be recorded monthly.

Old Permit Conditions 5.2.8 through 5.2.10 were removed from the permit.

Old Permit Condition 5.2.11 was renumbered as New Permit Condition 5.2.4 which requires the Permittee to comply with the tune-up requirement outlined in Georgia Rule (rrr).

C. Compliance Assurance Monitoring (CAM)

Not Applicable

## VI. Record Keeping and Reporting Requirements

A. General Record Keeping and Reporting Requirements

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

B. Specific Record Keeping and Reporting Requirements

Permit Conditions 6.2.1 and 6.2.2 outline recordkeeping requirements under Georgia Rule (yy).

Permit Condition 6.2.3 requires the Permittee to retain monthly records and hours of operation for each generator in Equipment Groups PSG0, SEG0 and SEG1.

Permit Conditions 6.2.4 through 6.2.7 outline recordkeeping requirements for fuel consumption limits.

Permit Condition 6.2.8 and 6.2.9 outline recordkeeping requirements for fuel sulfur limits.

Permit Conditions 6.2.10 and 6.2.11 outline recordkeeping for the Concourse E Expansion project.

Permit Conditions 6.2.12 through 6.2.15 outline recordkeeping for SB00 Emission Limit.

Permit Condition 6.2.16 outlines Georgia Rule (rrr) recordkeeping and reporting requirements

Permit Condition 6.2.17 outlines semiannual reporting requirements.

Permit Condition 6.2.18 outlines 40 CFR Part 60 Subpart IIII recordkeeping requirements.

Permit Condition 6.2.19 requires the Permittee to demonstrate compliance with the emission limits as specified in 40 CFR 60 Subpart IIII by purchasing an engine certified to the applicable emission standards. The Permittee is required to maintain records of the engine certification in a format suitable for inspection or submittal.

Permit Condition 6.2.20 requires the permittee to maintain monthly operating records for the all engines in emergency or non-emergency service that are being recorded using the non-resettable hour meter as well as record the time and reason why the engine was in operation.

Previous Permit Conditions 6.2.20 through 6.2.23 outlining recordkeeping requirements for NSPS Subpart Kb have been deleted.

## VII. Specific Requirements

A. Operational Flexibility

None applicable.

B. Alternative Requirements

None applicable.

C. Insignificant Activities

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

D. Temporary Sources

None applicable.

E. Short-Term Activities

None applicable.

F. Compliance Schedule/Progress Reports

None applicable.

G. Emissions Trading

None applicable.

H. Acid Rain Requirements

None applicable.

I. Stratospheric Ozone Protection Requirements

None applicable.

J. Pollution Prevention

None applicable.

K. Specific Conditions

None applicable.

### VIII. General Provisions

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

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

Template Condition Section 8.27 was updated in August 2014 to include more detailed, clear requirements for emergency generator engines 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.//