Facility Name: **Southern Natural Gas Company, L.L.C. – Thomaston Compressor Station**
City: Thomaston
County: Upson
AIRS #: 04-13-293-00025

Application #: TV-632254
Date Application Received: February 3, 2022
Permit No: 4922-293-0025-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: Southern Natural Gas Company, L.L.C. – Thomaston Compressor Station

2. Parent/Holding Company Name

   Kinder Morgan, Incorporated

3. Previous and/or Other Name(s)

   Southern Natural Gas Company – Thomaston Compressor Station

4. Facility Location

   5276 Highway 19 South,
   Thomaston, Georgia 30286-9382

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

   The facility is located in Upson County which was previously determined by the Director as contributing area to the ambient air level of ozone in the metropolitan Atlanta areas. On October 17, 2022, EPA approved the Air Protection Branch's redesignation request for Ozone; thus all areas in Georgia are now in attainment for ozone. Southern Natural Gas Company, L.L.C. – Thomaston Compressor Station is in attainment area for all criteria pollutants.

B. Site Determination

There are no other facilities which could possibly be contiguous or adjacent and under common control.

C. Existing Permits

Table 1 below lists all current Title V permits, all amendments, 502(b)(10) changes, and off-permit changes, issued to the facility, based on a comparative review of form A.6, Current Permits, of the Title V application and the "Permit" file(s) on the facility found in the Air Branch office.

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

Permit Number and/or Off-Permit Change	Date of Issuance/ Effectiveness	Purpose of Issuance
4922-293-0025-V-04-0	August 8, 2017	Title V Renewal

D. Process Description

1. SIC Codes(s)

   4922

The SIC Code(s) identified above were assigned by EPD's Air Protection Branch for purposes pursuant to the Georgia Air Quality Act and related administrative purposes only and are not intended to be used for any other purpose. Assignment of SIC Codes by EPD's Air Protection Branch for these purposes does not prohibit the facility from using these or different SIC Codes for other regulatory and non-regulatory purposes.

Should the reference(s) to SIC Code(s) in any narratives or narrative addendum previously issued for the Title V permit for this facility conflict with the revised language herein, the language herein shall control; provided, however, language in previously issued narratives that does not expressly reference SIC Code(s) shall not be affected.

2. Description of Product(s)

The facility compresses natural gas.

3. Overall Facility Process Description

The facility operates five natural gas fired compressor engines primarily designed to transport natural gas along the pipeline by receiving low-pressure inlet natural gas and compressing the gas to increase the pressure in the pipeline and maintain the downstream flow. Southern Natural Gas Company, L.L.C – Thomaston Compressor Station can receive gas from and transmit gas to any of the following facilities: Ellerslie (GA) and Ocmulgee (GA); as well as into/out of the SNG North Main Pipeline system. In order to supply electricity in the case of a power failure, two emergency generators rated at 340 hp and 615 hp are operated at the Thomaston Compressor Station. These units fire only pipeline quality natural gas. In addition, small natural gas units (such as water heaters and space heaters) are also operated at the facility. As part of the normal operation of the Thomaston Compressor Station, SNG routinely conducts activities associated with the maintenance and repair of engines and other equipment at the facility. Such activities associated with maintenance and repair include, but are not limited to, start-ups and shutdowns, upsets, and emergencies. Some of these activities result in release of natural gas (otherwise known as blowdown).

4. Overall Process Flow Diagram

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

E. Regulatory Status

1. PSD/NSR

SNG is a major source with regards to the New Source Review (NSR) and Prevention of Significant Deterioration of Air Quality (PSD) regulations. The facility is a major source because the potential to emit nitrogen oxides (NOx) is greater than the PSD major source threshold of 250 tons per year (tpy). The facility has been a major source dating back to the beginning of operations in 1966 but was not initially subject to NSR PSD permitting since PSD regulations became effective in 1977/1978. Generator No. 2 with Emission Unit ID No. G002, and Compressor

Engines Nos. 3 and 4 with Emission Unit ID Nos. C003 and C004, went through a PSD review in 2003. Please note that natural gas compression is not one of the 28 named industrial categories whose major source threshold is 100 ton/yr.

PSD requires that Best Available Control Technology (BACT) be used to control emissions that exceed the PSD significance level. SNG accepted a BACT limit in the PSD Permit issued on October 11, 2002 (Permit No. 4922-293-0025-V-01-3) in order to limit the NOx emission rate in C003 and C004 to below 7.3 lb/hr of NOx each. The facility has avoided PSD review for other past facility modifications by accepting to limit the CO emission rate in C003 and C004 to 1.83 lb/hr of CO each and limit the VOC emission rate in C003 and C004 to 4.43 lb/hr of VOC each.

PSD was not triggered when Compressor Engine No. 5 with Emission Unit ID No. C005 was manufactured and installed in June 2016. The emission factors for CO, NOx, and VOC for C005 are based on Cameron Compression Systems engine rebuild performance data referenced in Permit Amendment No. 4922-295-0025-V-03-2. The facility has avoided PSD review for C005 by accepting the following caps: limit the NOx emission rate to 8.82 lb/hr of NOx, limit the VOC emission rate to 6.17 lb/hr of VOC, and limit the CO emission rate to 17.64 lb/hr of CO.

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_{10}	yes			✓
$PM_{2.5}$	yes			✓
SO_2	yes			✓
VOC	yes	✓		
NO_x	yes	✓		
CO	yes	✓		
TRS	n/a			
H_2S	n/a			
Individual HAP	yes	✓		
Total HAPs	yes	✓		

3. MACT Standards

The facility is a major source for hazardous air pollutants (HAPs), with a combined PTE of 75 tons per year, which is greater than the 25 ton per year major source threshold, and a formaldehyde PTE of greater than the 10 ton per year major source threshold for an individual HAP. Therefore, the facility will be subject to any applicable provisions under 40 CFR 63 Subpart ZZZZ - Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines.

Compressor Engines No. 1 and No. 2 (Unit IDs: C001 and C002) are 2-stroke, lean-burn (2SLB) Reciprocating Internal Combustion Engines (RICE), each rated at 4,000 brake horsepower (bhp). Compressor Engines No. 3 and No. 4 (Unit IDs: C003 and C004) are 4-stroke, lean-burn (4SLB) RICE, each rated at 4,730 bhp. According to 40 CFR 63.6590(a)(1)(i) stationary RICE Emission Unit ID Nos. C001, C002, C003, and C004 meet the definition of "existing" stationary RICE. They are located at a major source of HAPs emissions, have greater than 500 bhp, and were constructed before December 19, 2002. Therefore, according to 40 CFR 63.6590(b)(3), these "existing" RICE are subject to only limited requirements; they do not have to meet the requirements of this subpart and of Subpart A of Part 63. No initial notification is necessary. However, according to 63.10(b)(3), the Permittee must keep a record of the applicability determination on site for a period of 5 years after the determination, or until the source changes its operations to become an affected source.

Emergency Engine Generator (Unit ID: G002) is a 4-stroke, rich-burn RICE with a rated bhp of 340. According to 40 CFR 63.6590(a)(1)(ii) this engine meets the definition of "existing" stationary RICE. It is located at a major source of HAPs emissions, has less than 500 bhp, and was constructed before June 12, 2006. According to 40 CFR 63.6595(a) this engine must comply with applicable emission and operating limitations no later than October 19, 2013.

Emergency Engine Generator No. 3 (Unit ID: G003) is a 4-stroke, rich-burn RICE with a rated bhp of 615. According to 40 CFR 63.6590(a)(1)(i) this engine meets the definition of "existing" stationary RICE. It is located at a major source of HAP emissions; has a site rating of more than 500 bhp and was constructed before December 19, 2002. According to 40 CFR 63.6590(b)(3)(iii) existing emergency RICE, with a site rating of more than 500 bhp located at a major source of HAP emissions, do not have to meet the requirements of this subpart and of subpart A of this part, including initial notification requirements.

Emergency Engine Generator No. 5 (Unit ID: C005) is considered a new stationary engine rated at more than 500 Hp and is subject to emissions limitations and operating requirements per 40 CFR 63.6600(b), as well as compliance demonstrations and performance testing. An oxidation catalyst is installed on the unit to reduce carbon monoxide emissions by 58 percent or more as required by Table 2a under 40 CFR 63.6600(b). Alternatively, Unit C005 may choose to limit the concentration of formaldehyde in the exhaust to 12 ppmvd or less at 15 percent O2.

4. Program Applicability (AIRS Program Codes)

Program Code	Applicable (y/n)
Program Code 6 - PSD	yes
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

This facility is subject to 40 CFR 60, Subparts A and OOOOa. The Unit C005 was installed in June 2016 and therefore subjects the facility to the regulation per 60.5365a(j). Condition 2.2.1 establishes general applicability for Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced After September 18, 2015.

C. Compliance Status

The facility did not indicate any non-compliance 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
C001	2SLB Compressor Engine No. 1, Rated @ 4000 Hp, Installed: 1966	40 CFR 63 Subpart ZZZZ 391-3-1-.02(2)(b) 391-3-1-.02(2)(g)	None	None
C002	2SLB Compressor Engine No. 2, Rated @ 4000 Hp, Installed: 1966	40 CFR 63 Subpart ZZZZ 391-3-1-.02(2)(b) 391-3-1-.02(2)(g)	None	None
C003	4SLB Compressor Engine No. 3, Rated @ 4730 Hp, Mfg: before 12/19/2002 Installed: 2001	40 CFR 52.21 40 CFR 63 Subpart ZZZZ 391-3-1-.02(2)(b) 391-3-1-.02(2)(g)	C003C	Oxidation Catalyst
C004	4SLB Compressor Engine No. 4, Rated @ 4730 Hp, Mfg: Before 12/19/2002 Installed: 2002	40 CFR 52.21 40 CFR 63 Subpart ZZZZ 391-3-1-.02(2)(b) 391-3-1-.02(2)(g)	C004C	Oxidation Catalyst
C005	2SLB Compressor Engine No. 5, Rated @ 4000 Hp, Mfg: Before 08/01/2015 Installed: 06/14/2016	40 CFR 60 Subpart A 40 CFR 60 Subpart JJJJ 40 CFR 60 Subpart OOOOa 40 CFR 63 Subpart A, 40 CFR 63 Subpart ZZZZ, 40 CFR 52.21 Avoidance, 391-3-1-.02(2)(b), 391-3-1-.02(2)(g)	C005C	Oxidation Catalyst
G002	Emergency Engine Generator, Rated @ 340 bhp, Type: 4-stroke-lean-burn, Installed: 2001 Mfg: Before 12/19/2002	40 CFR 52.21 40 CFR 63 Subpart A, 40 CFR 63 Subpart ZZZZ, 391-3-1-.02(2)(b)1, 391-3-1-.02(2)(g)2	n/a	n/a

B. Equipment & Rule Applicability

Emission and Operating Caps:

- 40 CFR 63.6590 and 63.6602 subjects Emergency Engine Generator No. 2 (Unit ID: G002) to operating limitations, which are primarily engine maintenance requirements, specified in Item 6 of Table 2c to 40 CFR 63 Subpart ZZZZ. These requirements are included in Condition 3.3.2 and require that the facility periodically change oil and filter, inspect spark plugs, and inspect all hoses and belts. 40 CFR 63.6640(b) requires that the facility report each instance that the facility does not meet the operating limitations; this is included in Condition 6.1.7.c.iii.

- 40 CFR 63.6640(f)(1) limits the hours of operation for G002 to 100 hours per year for maintenance checks and readiness testing and to 50 hours per year for non-emergency situations. However, there is no time limit on the emergency usage under 40 CFR 63.6640(f)(1)(i).

- 40 CFR 63.6625(f) requires that the facility install a non-resettable hour meter on G002. The requirement is included in Condition 5.2.4.

- 40 CFR 63.6600 and Table 2a limit formaldehyde concentration in the exhaust of Compressor Engine No. 5 (Unit ID: C005) to 12 ppmvd, or require reduction of CO emissions by 58%, and limit startup time to 30 minutes or less. Continuous compliance with the emission and operating limitations will be demonstrated as outlined in 40 CFR 63.6640.

- 40 CFR 63.6600(b) establishes emissions standards C005.

- Table 1 in 40 CFR 60 Subpart JJJJ establishes the NOx, CO, and VOC emission standards for Stationary Non-Emergency SI Engines ≥ 100 HP (Except Gasoline and Rich Burn LPG), Stationary SI Landfill/Digester Gas Engines, and Stationary Emergency Engines > 25 HP. C005 is specified by the supplier to have emission rates under the required 1.0 g/hp-hr NOx, 2.0 g/hp-hr CO, and 0.7 g/hp-hr VOC, thus meeting the requirements of this subpart for non-emergency engines. However, C005 is not an EPA-certified engine, so periodic testing is required.

- The facility does not operate the engine using propane, so the operation requirements in 40 CFR 60.4243(e) do not apply.

Rules and Regulations Assessment:

Georgia Rule 391-3-1-.02(2)(b)
Georgia Rule (b) limits visible emissions from all units (Unit IDs: C001, C002, C003, C004, C005, G002 and G003) to 40 percent opacity. Compliance is expected since combustion of natural gas in a well-tuned engine produces little visible emissions.

Georgia Rule 391-3-1-.02(2)(g)
Georgia Rule (g) limits SO_2 emissions by limiting the amount of sulfur content in the fuel to 2.5 percent sulfur by weight in any fuel burning source below 100 MMBtu/hr of heat input capacity. Rule (g) is applicable to all units at this facility and compliance is expected since natural gas has little sulfur content.

40 CFR 60 Subpart DDDDD – National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters
This regulation was promulgated on March 21, 2011, and is applicable to industrial, commercial, or institutional boiler or process heater that is located at, or is part of, a major source of HAP. This rule is applicable to the boiler and fuel gas heater located at the Thomaston Compressor Station since the Station is a major source of HAP. The 1.00 MMBtu/hr boiler (Unit ID: B001) and the 0.25 MMBtu/hr fuel gas heater (Unit ID: FG01) are classified as existing natural gas burning units (they were constructed before June 4, 2010), less than 5 MMBtu/hr. As such, the boiler and fuel gas heater are subject to tune ups every five (5) years, a facility energy assessment, and the associated reporting and recordkeeping requirements. As these units are considered insignificant, however, these requirements are not specified for these units within the permit, Requirements are generally covered by Condition 8.28.2 of the Permit.

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

This regulation was promulgated on January 18, 2008, and is applicable to Compressor Engine No. 5 (Unit ID: C005), because it is a spark ignition (SI) internal combustion engine (ICE). According to 40 CFR 60.4230(a)(4)(i), owners and operators of stationary SI RICE with a maximum engine power greater than or equal to 500 hp that commenced construction after June 12, 2006, are subject to NSPS Subpart JJJJ. Since C005 is greater than 500 HP and has a rebuild year of 2016, it is subject to Subpart JJJJ.

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

The MACT standard for RICE was promulgated on June 15, 2004, as 40 CFR 63 Subpart ZZZZ. Under this rule, an affected source is any existing RICE with a site-rating of more than 500 bhp located at a major source of HAP emissions. Since existing stationary RICE units (Unit ID Nos. C001 through C004, and G003) each have a horsepower rating greater than 500 bhp, they are subject to Subpart ZZZZ, but there are no applicable requirements in this MACT for such existing engines, as stated in §63.6590(b)(3). Existing stationary RICE (Unit ID: G002) has a site rating of equal to or less than 500 HP located at a major source of HAP emissions. Therefore, it is subject to the operating limitations, which are primarily engine maintenance requirements, specified in Item 6 of Table 2c of Subpart ZZZZ. New stationary RICE (Unit ID: C005) has a horsepower rating greater than 500 bhp, it is subject under 40 CFR 63.6590(a) and Tables 2a and 2b to Subpart ZZZZ.

40 CFR 60 Subpart OOOOa – Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced After September 18, 2015

Subpart OOOOa applies to owners or operators of one or more of the onshore affected facilities listed in paragraphs (a) through (j) of this section, located within the Crude Oil and Natural Gas Production source category, for which construction, modification, or reconstruction commenced after September 18, 2015. Per 40 CFR 60.5365a(j), the collection of fugitive emissions components at a compressor station is an affected facility. SNG meets the definition of a compressor station which as defined in § 60.5430a as any permanent combination of one or more compressors that move natural gas at increased pressure through gathering pipelines. Compressor Engine No. 5 (Unit ID: C005) was installed after September 18, 2015 and is therefore subject to regulation per 40 CFR 60.5365a(j). This unit is subject to 40 CFR 63.5415a(c)(3) which requires the replacement of compressor rod packing every 26,000 hours of operation or every 36 months. In addition, the new fugitive emissions components must utilize an enhanced leak detection and repair (LDAR) monitoring plan required by 40 CFR 60.5397a.

C. Permit Conditions

Conditions 3.2.1 and 3.2.3 specify PSD avoidance limits for carbon monoxide (CO) and volatile organic compound (VOC) emissions from each of the compressor engines (Unit IDs: C003 and C004).

Conditions 3.2.2, 3.2.8, and 3.2.9 state the pollutant emission limit to avoid PSD review for CO, VOCs, and nitrogen oxides (NOx) for compressor engine (Unit ID: C005).

Condition 3.2.4 limits the annual hours of operation on each emergency generator per Rule (mmm).

Condition 3.2.5 limits the inlet temperature to each of Compressor Engine No. 3, No. 4, and No. 5 (Unit IDs: C003, C004 and C005) to between 450 and 1350 °F. This ensures the facility will not exceed the CO or VOC emission limits established in Conditions 3.2.1, 3.2.2, 3.2.3, and 3.2.8, respectively.

Condition 3.2.6 limits the pressure drop across each of the oxidation catalysts controlling Compressor Engine No. 3, No. 4, and No. 5 (Unit IDs: C003C, C004C and C005C) to no more than two inches of water at 100% load (±10%), from the pressure drop established during the initial performance test or the most recent test, if required.

Condition 3.2.7 specifies the best available control technology (BACT) limit for NOx emitted from C003 and C004.

Condition 3.2.10 requires the Permittee fire only natural gas in Unit C005.

Condition 3.3.1 subjects the Permittee to 40 CFR 63 Subpart ZZZZ - NESHAP for RICE. Emergency Engine Generator No. 2 (Unit ID: G002) is subject to operating limitations under this subpart and C005 is subject to operating limits, testing, monitoring, recordkeeping, and reporting requirements under this subpart.

Condition 3.3.2 subjects G002 to the operating (maintenance) limitations specified in 40 CFR 63.6602 and Item 6 of Table 2c to this subpart.

Condition 3.3.3 includes the operating limitations specified in 40 CFR 63.6625(e)(2) and 63.6640(a); and Item 9 of Table 6 to 40 CFR 63 Subpart ZZZZ for G002.

Condition 3.3.4 provides the facility the option to extend the oil change requirement specified in Condition 3.3.2.a, which is authorized in 40 CFR 63.6625(j).

Condition 3.3.5 limits the hours of operation for G002 to 200 hours per year for emergency situations, 100 hours per year for maintenance checks and readiness testing, and 50 hours per year for non-emergency situations. Condition 3.3.5.c has been updated to omit obsolete language and reflect amendments made to 40 CFR 63 Subpart ZZZZ on August 10, 2022.

Condition 3.3.6 subjects G002 to the requirements specified in 40 CFR 63.6605(a) and (b) for continued compliance.

Condition 3.3.7 requires the Permittee to comply with all applicable provisions of 40 CFR 60 Subparts A and JJJJ for C005.

Conditions 3.3.8 and 3.3.9 contain the emission and operating limits from 40 CFR 60 Subpart JJJJ for C005. Conditions 3.3.8 and 3.3.9 have been modified to reflect corrected emission and operating limits for engines manufactured after July 1, 2010, and because C005 is not a certified engine as previously understood.

Conditions 3.3.10 through 3.3.13 contain the emission and operating limits from 40 CFR 63 Subparts A and ZZZZ for C005.

New Condition 3.3.14 requires the Permittee comply with 40 CFR Subpart OOOOa for the collection of fugitive emissions components at the compressor station.

New Condition 3.3.15 requires the Permittee replace the reciprocating compressor rod packing for Unit C005 per 40 CFR 60 Subpart OOOOa.

New Condition 3.3.16 establishes alternative means of emission limitations for GHG and VOC from the collection of fugitive emissions components at a compressor station.

Condition 3.4.1 limits the opacity from each compressor engine and emergency generator to under 40 percent as specified by Rule (b).

Condition 3.4.2 limits the fuel sulfur content from each compressor engine and emergency generator to 2.5 percent by weight as specified by Rule (g).

IV. Testing Requirements (with Associated Record Keeping and Reporting)

A. General Testing Requirements

The permit includes a requirement that the Permittee conduct performance testing on any specified emission unit when directed by the Division. Additionally, a written notification of any performance test(s) is required 30 days (or sixty (60) days for tests required by 40 CFR Part 63) prior to the date of the test(s) and a test plan is required to be submitted with the test notification. Test methods and procedures for determining compliance with applicable emission limitations are listed and test results are required to be submitted to the Division within 60 days of completion of the testing.

B. Specific Testing Requirements

Condition 4.2.1 contains CO performance testing required for the initial performance test for C005, and upon replacement of each catalyst for each compressor engine.

Modified Conditions 4.2.2 and 4.2.3 require the Permittee conduct performance testing initially as specified in 40 CFR 60.4243(b)(2)(ii) and subsequently as specified in 40 CFR 63.6615 and 40 CFR 63.6620 for C005. This condition was modified to meet non-certified engines requirements and demonstrate compliance with Condition 3.3.8.

Old Conditions 4.2.4, 4.2.5 and 4.2.10 have been removed from the permit since C005 is a non-certified engine.

New Condition 4.2.4 contains 40 CFR 60 Subpart JJJJ testing procedures for conducting performance testing as specified in Conditions 4.2.1 and 4.2.2.

Conditions 4.2.5 through 4.2.9 have been renumbered following the removal of Old Conditions 4.2.4, 4.2.5, and 4.2.10. Conditions 4.2.5, 4.2.8, and 4.2.9 have been modified to include CO compliance requirements for C005 and update verbiage.

New Conditions 4.2.10 establish the procedures and requirements for submitting performance testing results to EPA.

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 requires the Permittee to calibrate, maintain, and operate portable analyzers for the measurement of O_2, CO, and NOx concentrations. These measurements are required to verify that the CO and NOx emission rates of C003, C004, and C005, do not exceed those allowed by this permit.

Condition 5.2.2 requires the Permittee to install, calibrate, maintain, and operate a system to continuously monitor the inlet temperature to the oxidation catalyst of C003, C004 and C005.

Condition 5.2.3 requires the Permittee to install an alarm on each temperature monitoring device required for C003, C004 and C005 (Unit IDs: C003C, C004C, C005C) by Condition 5.2.2.

New Condition 5.2.4 requires the Permittee monitor the number operational hours or keep track of the number of months since the last rod packing replacement for C005, whichever is latest.

Old Condition 5.2.4 becomes New Condition 5.2.5 and requires the Permittee to install and operate a non-resettable hour meter to measure and record the number of hours operated for G002 per 40 CFR 63.6625(f).

Old Conditions 5.2.7 and 5.2.8 become New Conditions 5.2.8 and 5.2.9, which include the 40 CFR 63 Subpart ZZZZ parameter monitoring requirements for C005.

New Condition 5.2.10 establishes the site-specific monitoring plan as required under 40 CFR 63.6625(b)

New Conditions 5.2.11 through 5.2.13 specify how the Permittee must perform a monitoring survey of each collection of fugitive emissions components at the compressor station.

New Condition 5.2.14 provides guidance for monitoring and repairing all sources of fugitive emissions.

C. Compliance Assurance Monitoring (CAM)

The CAM requirements apply to Units C003, C004, and C005 as applicable air pollutants have the potential for pre-controlled emissions to be in excess of major source thresholds. These units are subject to emission limitations or standards for a regulated air pollutant that is not exempt, and use a control device to achieve compliance with an emission limit or standard.

Old Condition 5.2.5 becomes New Condition 5.2.6 and specifies each compressor engine subject to the Compliance Assurance Monitoring (CAM) rule for carbon monoxide.

Old Condition 5.2.6 becomes New Condition 5.2.7 and requires that the carbon monoxide monitoring equipment for the oxidation catalyst installed on C003, C004, and C005, each comply with the CAM performance criteria stipulated therein.

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.

Conditions 6.1.7.b and 6.1.7.c have been modified to include exceedances that were previously omitted for Engines C003, C004, and C005.

B. Specific Record Keeping and Reporting Requirements

Condition 6.2.1 includes the record keeping requirements specified in 40 CFR 63.6655(a) for C005. It provides a list of records and documentations, including all notifications, reports, test results, malfunction records, and maintenance records that the facility must keep.

Condition 6.2.2 includes the maintenance record keeping requirements, specified in 40 CFR 63.6655(d) and (e), for G002 and C005.

Condition 6.2.3 requires the facility keep records of the hours of operation for G002, using the non-resettable hour meter required in Condition 5.2.5.

Conditions 6.2.4 contains the specific reporting requirements for C005 under 40 CFR 60 Subpart JJJJ. This condition has been modified to remove 6.2.4.d and 6.2.4.e since C005 is not a certified engine.

Old Conditions 6.2.5, 6.2.7, and 6.2.9 have been removed from the permit following initial reports received from the facility for C005.

New Conditions 6.2.5 through 6.2.9 contain the specific reporting requirements for C005 under 40 CFR 63 Subpart ZZZZ. These conditions have been renumbered following the removal of Old Conditions 6.2.5, 6.2.7, and 6.2.9.

New Condition 6.2.10 requires the Permittee to submit an annual report according to 40 CFR 63.6650 should G002 operate in accordance with Condition 3.3.5.c.

New Condition 6.2.11 requires the Permittee maintain records of the cumulative hours of operation, number of months since initial startup, or since the previous replacement of the rod packing for C005.

New Condition 6.2.12 requires the Permittee demonstrate continuous compliance with the fugitive emission standards specified in § 60.5397a(a)(1).

New Condition 6.2.13 requires the Permittee keep records for each monitoring survey specified in Conditions 5.2.11 & 5.2.12.

New Condition 6.2.14 reiterates submitting reports to EPA via CEDRI per 40 CFR 60 Subpart OOOOa.

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

- Not applicable.

E. Short-Term Activities

- None applicable.

F. Compliance Schedule/Progress Reports

- None applicable.

G. Emissions Trading

- Not applicable.

H. Acid Rain Requirements

- Not applicable.

I. Stratospheric Ozone Protection Requirements

The standard permit condition pursuant to 40 CFR 82 Subpart F has been included in the Title V Permit. These Title VI requirements apply to all air conditioning and refrigeration units containing ozone-depleting substances regardless of the size of the unit or of the source. Since Southern Natural Gas Company, L.L.C. – Thomaston Compressor Station has at least some air conditioners, chillers and refrigerators, Subpart F is an applicable requirement.

J. Pollution Prevention

- Not 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.//