

Facility Name: **Municipal Electric Authority of Georgia - Wansley Unit 9**
City: Franklin
County: Heard
AIRS #: 04-13-14900007

Application #: TV-669109
Date Application Received: September 7, 2022
Permit No: 4911-149-0007-V-05-0

| Program | Review Engineers | Review Managers |
|-----------------------------------|-------------------------|------------------------|
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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: Municipal Electric Authority of Georgia-Wansley Unit 9.
2. Parent/Holding Company Name: Municipal Electric Authority of Georgia
3. Previous and/or Other Name(s)

Power Block Number 9 was previously permitted under the name – Georgia Power Company Wansley Steam – Electric Generating Plant. The facility is commonly known and referred to as Wansley Unit 9 or MEAG Unit 9.

4. Facility Location

3461 Hollingsworth Ferry Road
Franklin, Georgia 30217
Heard County

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

The facility is located in Heard County which is an attainment area for all pollutants regulated under the National Ambient Air Quality Standards (NAAQS).

B. Site Determination

The Wansley Steam-Electric Generating Plant (AFS No. 149-00001), the Chattahoochee Energy Facility (AFS No. 149-00006), the Municipal Electric Authority of Georgia-Wansley Unit 9 (AFS No. 149-00007), and the Southern Power – Wansley Combined-cycle Generating Plant (AFS No. 149-00011) are permitted separately. Collectively, they comprise the same Title V site. However, each separate owner/operator is only accountable, for compliance purposes, for the individual electrical generating units that they own or operate.

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 |
|--|--------------------------------|---------------------|
| 4911-149-0007-V-04-0 | March 15, 2018 | Title V Renewal |

D. Process Description

1. SIC Codes(s)

4911

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 Municipal Electric Authority of Georgia-Wansley Unit 9 facility generates electricity for sale.

3. Overall Facility Process Description

The MEAG Wansley Unit 9 facility consists of one natural gas-fired combined-cycle block that will generate a total of approximately 570 megawatts (MWs) of electric power.

4. Overall Process Flow Diagram

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

E. Regulatory Status

1. PSD/NSR

The Wansley Steam-Electric Generating Plant (AFS No. 149-00001), the Chattahoochee Energy Facility (AFS No. 149-00006), the Municipal Electric Authority of Georgia-Wansley Unit 9 (AFS No. 149-00007), and the Southern Power – Wansley Combined-cycle Generating Plant (AFS No. 149-00011) are permitted separately. Collectively, they comprise the same Title V site. However, each separate owner/operator is only accountable, for compliance purposes, for the individual electrical generating units that they own or operate.

This Title I site is a major source under PSD because it has potential emissions of particulate matter (PM), sulfur dioxide (SO₂), nitrogen oxides (NO_x), volatile organic compounds (VOCs), and carbon monoxide (CO) greater than 100 tons per year (TPY).

The 100 TPY limit applies because the site's operations are listed as one of the 28 named source categories under PSD. Portions of the Title I site were originally constructed before the PSD regulations were effective.

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 | Y | ✓ | | |
| PM ₁₀ | Y | ✓ | | |
| PM _{2.5} | Y | ✓ | | |
| SO ₂ | Y | ✓ | | |
| VOC | Y | ✓ | | |
| NO _x | Y | ✓ | | |
| CO | Y | ✓ | | |
| TRS | N | | | |
| H ₂ S | N | | | |
| Individual HAP | Y | ✓ | | |
| Total HAPs | Y | ✓ | | |

3. MACT Standards

The facility is subject to 40 CFR 63 Subpart YYYYY - National Emission Standard for Hazardous Air Pollutants: Stationary Combustion Turbines. However, the existing combustion turbines (constructed before January 14, 2003) do not have to meet the requirements of this subpart and of subpart A of this part.

No initial notification is necessary for any existing stationary combustion turbine, even if a new or reconstructed turbine in the same category would require an initial notification, per 40 CFR 63.6090(b)(4).

4. Program Applicability (AIRS Program Codes)

| Program Code | Applicable (y/n) |
|---------------------------------|---------------------|
| Program Code 6 - PSD | Y |
| Program Code 8 – Part 61 NESHAP | N |
| 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:

Not applicable.

B. Applicable Rules and Regulations

Not applicable.

C. Compliance Status

The facility permit application did not indicate any non-compliance issue.

D. Permit Conditions

Not 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 |
| CT9A | Combustion Turbine Unit 9A | 40 CFR 60 Subpart A 40 CFR 60 Subpart GG 40 CFR 52.21 391-3-1-.02(2)(b) and (g) Acid Rain 40 CFR 63 Subpart A 40 CFR 63 Subpart YYYYY | LC9A SC9A | Low NOx Burner SCR |
| DB9A | HRSB, for combustion turbine CT9A, supplementary fired by Duct Burner Unit 9A. | 40 CFR 60 Subpart A 40 CFR 60 Subpart Da 40 CFR 52.21 391-3-1-.02(2)(d) and (g) Acid Rain | LD9A SC9A | Low NOx Burner SCR |
| CT9B | Combustion Turbine Unit 9B | 40 CFR 60 Subpart A 40 CFR 60 Subpart GG 40 CFR 52.21 391-3-1-.02(2)(b) and (g) Acid Rain 40 CFR 63 Subpart A 40 CFR 63 Subpart YYYYY | LC9B SC9B | Low NOx Burner SCR |
| DB9B | HRSB, for combustion turbine CT9B, supplementary fired by Duct Burner Unit 9B. | 40 CFR 60 Subpart A 40 CFR 60 Subpart Da 40 CFR 52.21 391-3-1-.02(2)(d) and (g) Acid Rain | LD9B SC9B | Low NOx Burner SCR |

* Generally applicable requirements contained in this permit may also apply to emission units listed above. The lists of applicable requirements/standards are intended as a compliance tool and may not be definitive.

B. Equipment & Rule Applicability

Emission and Operating Caps:

Not applicable.

Rules and Regulations Assessment:

Part 52.21, Chapter 1, Title 40 of the Code of Federal Regulations (40 CFR Part 52.21) Prevention of Significant Deterioration of Air Quality [PSD]

The requirements of the PSD regulation apply to a major source as defined by 40 CFR 52.21(b)(1)(i)(a) which emits, or has the potential to emit, 250 tons per year (100 tons per year for listed 28 named source categories) or more of any regulated new source review (NSR) pollutant.

The power block (known as Power Block 9) which includes combustion turbines (Source Codes: CT9A and CT9B) and duct burners (Source Codes: DB9A and DB9B) were originally permitted by the previous owner (Georgia Power) as part of a project that involved the construction and operation of four (4) combined-cycle blocks at their existing Wansley Steam-Electric Generating Plant in Roopville, Heard County, Georgia. This project underwent PSD review. The detailed PSD review

and analysis for this project can be located in the associated preliminary determination¹ for Permit Number 4911-149-0001-V-01-2² issued on July 28, 2000. According to the Prevention of Significant Air Quality Deterioration Review of a Major Modification and a Part 70 Significant Modification Review at the Georgia Power Company Wansley Steam-Electric Generating Plant located in Roopville, Heard County, *Georgia* dated May 2000, the PSD determination for Power Block 9 is as summarized below:

Summary of PSD BACT Determination for Power Block 9

| Pollutant | BACT for the Combustion Turbine Exit | BACT for the Duct Burner Exit | BACT Limit for the Combined Stack Exit (Permit Limit) | Averaging Period |
|---------------------|--------------------------------------|-------------------------------|--|----------------------------------|
| NO _x | Dry Low NO _x Combustor | Low NO _x Burner | Controlled by Selective Catalytic Reduction | 30-day rolling average |
| | | | 3.5 parts per million on a dry volume basis (ppmvd) @ 15% Oxygen (O ₂) | |
| CO | Efficient Combustion | Efficient Combustion | - | - |
| | 0.034 pound per million Btu | 0.216 pound per million Btu | 0.061 pound per million Btu | Based on applicable test method. |
| | 66.2 pounds per hour | 75 pounds per hour | - | - |
| VOC | Efficient Combustion | Efficient Combustion | - | - |
| | 0.002 pound per million Btu | 0.039 pound per million Btu | 0.008 pound per million Btu as methane | Based on applicable test method. |
| | 3.9 pounds per hour | 13.1 pounds per hour | | |
| SO ₂ | Natural gas-fired only | Natural gas-fired only | Natural gas-fired only | Not Applicable |
| | - | 0.0006 pound per million Btu | - | |
| PM/PM ₁₀ | Natural gas-fired only | Natural gas-fired only | - | - |
| | Efficient Combustion | Efficient Combustion | - | - |
| | 0.009 pound per million Btu | 0.007 pound per million Btu | 0.010 pound per million Btu | Based on applicable test method. |
| | 17.6 pounds per hour | 2.4 pounds per hour | - | - |
| | 10 percent opacity | 10 percent opacity | 10 percent opacity | 6-minute average |

¹ <https://permitsearch.gaepd.org/permit.aspx?id=PDF-PP-12224>

² <https://permitsearch.gaepd.org/permit.aspx?id=PDF-PI-12224>

When MEAG became the owner and operator of Power Block 9, Permit Number 4911-149-0007-V-01-0 was issued on February 4, 2002 to MEAG and included all applicable PSD limits.

Part 60, Chapter I, Title 40 of the Code of Federal Regulations (40 CFR 60) New Source Performance Standards (NSPS) Subpart Da – Standards of Performance for Electric Utility Steam Generating Units for Which Construction is Commenced After September 18, 1978

The regulation is applicable to each electric utility steam generating unit that is capable of combusting more than 73 megawatts (MW) (250 million British thermal units per hour) heat input of fossil fuel (either alone or in combination with any other fuel), and was constructed, modified, or reconstructed after September 18, 1978 [40 CFR 60.40Da(a)]. This regulation is applicable to the duct burners (Source Codes: DB9A and DB9B).

There is an emission standard for PM, SO₂, and NO_x from each duct burner under this regulation as summarized below:

- 0.03 pounds of PM per million Btu
- Opacity 20% opacity except for one six-minute period per hour of not more than 27 percent.
- 0.20 pounds of SO₂ per million Btu on a 30-day rolling average
- 1.6 pounds of NO_x per mega-watt hour, gross energy output, based on a 30-day rolling average

Part 60, Chapter I, Title 40 of the Code of Federal Regulations (40 CFR 60) New Source Performance Standards (NSPS) Subpart GG – Standards of Performance for Stationary Gas Turbines

This regulation is applicable to combustion turbines with a heat input at peak load equal to or greater than 10.7 gigajoules (10 million Btu) per hour, based on the lower heating value of the fuel fired, and constructed after October 3, 1977. The combustion turbines are subject to this regulation.

Per page 18 of the preliminary determination associated with the original permitting of power block, the allowable fuel sulfur content is 0.8 percent by weight in accordance with 40 CFR 60.333(b). The allowable NO_x emission rate is specified by the following formula [40 CFR 60.332(a)(1)] because each turbine has a heat input rating greater than 100 million Btu/hr:

$$\text{STD} = 0.0075 (14.4/Y) + F$$

where: STD = allowable NO_x emissions (% volume @ 15% O₂, dry)

Y = heat rate in kilojoules per watt hour

F = fuel bound nitrogen allowance

Note: The application reported a value of 10.00 kJ/W-hr for “Y” and 0 for “F” yielding an allowable NO_x emission rate of 108 ppmvd corrected to 15% oxygen, dry basis. However, actual values of Y and F may vary depending on both the fuel and the actual operation of the turbine.

These limitations may have been superseded by applicable PSD limits.

Part 60, Chapter I, Title 40 of the Code of Federal Regulations (40 CFR 60) New Source Performance Standards (NSPS) Subpart KKKK – Standards of Performance for Stationary Combustion Turbines

This regulation does not apply as the combustion turbine was constructed prior to February 18, 2005.

Part 63, Chapter I, Title 40 of the Code of Federal Regulations (40 CFR 63) National Emission Standards for Hazardous Air Pollutants (NESHAP) Subpart YYYY- Standards for Stationary Combustion Turbines

This regulation is applicable to combustion turbines that are located at a major source of hazardous air pollutants (HAPs) [40 CFR 63.6085]. The regulation defines an existing stationary turbine as a stationary combustion turbine which commenced construction or reconstruction on or before January 14, 2003 [40 CFR 63.6090(a)(1)]. Combustion Turbine Units CT9A and CT9B were constructed in 2002 and installed in 2003 and therefore are classified as existing combustion turbines.

Existing stationary combustion turbines in all subcategories do not have to meet the requirements of Subpart YYYY and of Subpart A of 40 CFR 63. No initial notification is necessary for any existing stationary combustion turbine, even if a new or reconstructed turbine in the same category would require an initial notification [40 CFR 63.6090(4)].

Although the regulation is applicable, there are no emission limits, operating standards, notification requirements, or reporting requirements for Combustion Turbine Units CT9A and CT9B.

Federal Rule – Cross-State Air Pollution Rule (CSAPR)

The CSAPR took effect on January 1, 2015. The existing steam generating units are regulated as “existing units” under CSAPR as discussed in the following regulatory provisions (1) Annual NO_x per 40 CFR Part 97.411(b) and Part 97.412; (2) Ozone Season NO_x per 40 CFR Part 97.511(b) and Part 97.512; and (3) Annual SO₂ Group 2 in 40 CFR Part 97.711(b) and Part 97.712.

On September 7, 2016, the U.S. EPA finalized an update to the CSAPR ozone season program by issuing the CSAPR Update. This rule addresses the summertime (May – September) transport of ozone pollution in the eastern United States that crosses state lines to help downwind states and communities meet and maintain the 2008 ozone national ambient air quality standard (NAAQS).

“One state, Georgia, has an ongoing original CSAPR NO_x ozone season FIP requirement with respect to the 1997 ozone NAAQS, but the EPA has found that it does not contribute to interstate transport with respect to the 2008 ozone NAAQS. The EPA did not reopen comment on Georgia’s interstate transport obligation with respect to the 1997 ozone NAAQS in this rule making, so Georgia’s original CSAPR NO_x ozone season requirements (including its emission budget) continue unchanged.

In addition to reducing interstate ozone transport with respect to the 2008 ozone NAAQS, this rule also addresses the status of outstanding interstate ozone transport obligations with respect to the 1997 ozone NAAQS....”.

Further, according to the U.S. EPA's *Map of States Covered by CSAPR*, which is available at <https://www.epa.gov/airmarkets/map-states-covered-csapr>, Georgia (the only pink state on the map) is covered by CSAPR for both fine particles (SO₂ and annual NO_x) and ozone (ozone season NO_x). The U.S. EPA website also maintains a table indicating the applicable CSAPR programs for Georgia as follows:

States that are affected by the Cross-State Air Pollution Rule (CSAPR)

| State | Required to Reduce Emissions of NO _x during the Ozone Season (1997 Ozone NAAQS) | Required to Reduce Emissions of NO _x during the Ozone Season (2008 Ozone NAAQS) | Required to Reduce Annual Emissions of SO ₂ and NO _x (1997 Annual PM _{2.5} NAAQS) | Required to Reduce Annual Emissions of SO ₂ and NO _x (2006 24-Hour PM _{2.5} NAAQS) | *SO ₂ Group |
|---------|--|--|--|---|------------------------|
| Georgia | X | | X | X | 2 |

* The final CSAPR divides the states required to reduce SO₂ into two groups. Both groups must reduce their SO₂ emissions beginning in Phase I. Group 1 states must make significant additional reductions in SO₂ emissions for Phase II in order to eliminate their significant contribution to air quality problems in downwind areas.

According to the above, the Division has determined that the facility is subject to the requirements of CSAPR. Permit Conditions 7.15.1 through 7.15.3 of the proposed Title V renewal permit contain the applicable CSAPR requirements.

C. Permit Conditions

Permit Condition 3.3.1 defines the common stacks per 40 CFR 52.21.

Permit Condition 3.3.2 limits the type of fuel combusted in the combustion turbines.

Permit Condition 3.3.3 limits the type of fuel combusted in the duct burners.

Permit Condition 3.3.4 limits long-term NO_x emissions from the combined stacks.

Permit Condition 3.3.5 limits the operating load of the combustion turbines.

Permit Condition 3.3.6 limits NO_x emissions from the combined stacks.

Permit Condition 3.3.7 limits CO emissions from the combined stacks.

Permit Condition 3.3.8 limits PM emissions from the combined stacks.

Permit Condition 3.3.9 limits VOC emissions from the combined stacks.

Permit Condition 3.3.10 limits opacity from the combined stacks.

Permit Condition 3.3.11 requires the installation of dry low NO_x combustors as BACT for the turbine's natural gas combustion.

Permit Condition 3.3.12 requires the installation of dry low NO_x combustors as BACT for the duct burners natural gas combustion.

Permit Condition 3.3.13 requires the installation of a selective catalytic reduction system on each combined stack that is defined in Permit Condition 3.3.1.

Permit Condition 3.3.14 incorporates the applicability of 40 CFR 63 Subpart A to combustion turbines CT9A and CT9B.

Permit Condition 3.3.15 incorporates the applicability of 40 CFR 60 Subparts A and GG to combustion turbines CT9A and CT9B.

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

Permit Condition 4.2.1 requires the facility to conduct performance tests on each combined turbine and duct burner stack noted in Permit Condition 3.3.1, for nitrogen oxides to verify compliance with Permit Condition 3.3.6.

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 Conditions 5.2.1 and 5.2.2 require the facility to install a CEMS for measuring the NO_x concentration and oxygen concentration discharge to the atmosphere from each combustion turbine and duct burner combined stack.

Permit Condition 5.2.3 requires the facility to monitor and record the fuel consumption fired in the combustion turbines (Source Codes: CT9A and CT9B) and in each duct burner (Source Codes: DB9A and DB9B).

Permit Condition 5.2.4 provides the facility with methods and procedures to supplement CEMS data if it is necessary.

Permit Condition 5.2.5 requires the facility to determine and record the mass emission rate of nitrogen oxides from each combustion turbine and duct burner.

Permit Condition 5.2.6 requires the facility to monitor the sulfur content of the natural gas burned in combustion turbines (Source Codes: CT9A and CT9B).

Permit Condition 5.2.7 requires the facility to monitor the sulfur content of the natural gas burned in the HRSGs DB9A and DB9B.

Permit Condition 5.2.8 indicates that the nitrogen content of the natural gas burned in the turbines (Source Codes: CT9A and CT9B) is not required.

Permit Condition 5.2.9 requires the facility to determine and record the electrical output (in MWs) for each combined combustion turbine and heat recovery steam generator for each hour of operation.

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 quarterly basis.

Permit Condition 6.1.7a.i. defines excess emissions as any unit operating hour in which the 4-hour rolling average NO_x concentration exceeds the applicable emission limit in 40 CFR 60.332(a)(1) for each combustion turbine.

Permit Condition 6.1.7b.i. defines exceedances as any thirty (30) day rolling average NO_x emission rate which exceeds 3.5 ppmvd, corrected to 15 percent oxygen, from each of the affected facilities noted in Permit Condition 3.3.1.

Permit Condition 6.1.7b.ii. defines exceedances as any hour period during which the average megawatt output of a turbine (Source Codes: CT9A and CT9B) is less than 85 MW.

Permit Condition 6.1.7b.iii. defines exceedances as semiannual analysis of the natural gas fired in turbines (Source Codes: CT9A and CT9B) whose sulfur content exceeds 0.01 weight percent.

Permit Condition 6.1.7d.i requires the facility to submit reports of the nitrogen oxides emissions from each of the combustion turbine and duct burner combined stacks. The reports shall contain the total 12-consecutive month total nitrogen oxides emissions for each of the three months in the quarter.

Permit Conditions 6.1.7d.ii. through vii. include the recordkeeping requirement for any periods for which NO_x emissions data are not available for the duct burners.

B. Specific Record Keeping and Reporting Requirements

Permit Condition 6.2.1 requires the facility to perform quarterly reporting of the NO_x emissions from the combustion turbines (Source Codes: CT9A and CT9B), and the duct burners (Source Codes: DB9A and DB9B).

Permit Condition 6.2.2 requires the facility to retain monthly record of the natural gas burned in the combustion turbines (Source Codes: CT9A and CT9B), and the duct burners (Source Codes: DB9A and DB9B).

Permit Condition 6.2.3 requires the facility to include a certification, in the quarterly reports noted that only natural gas was burned in the duct burners (Source Codes: DB9A and DB9B).

Permit Condition 6.2.4 provides the facility with a list of information required to be reported to the Division if the minimum quantity of emission data as specified in Permit Condition 5.2.2a is not obtained for any 30 successive operating days.

Permit Condition 6.2.5 requires the facility to submit reports of excess emissions and monitor downtime for each combustion turbine (Source Codes: CT9A and CT9B).

VII. Specific Requirements**A. Operational Flexibility**

Other than the standard conditions (7.1.1, 7.2.1, and 7.2.2), operational flexibility provisions have not been incorporated into this Title V Permit. The applicant did not include any alternative operating scenarios in their Title V Application or request any specific operational flexibility conditions.

B. Alternative Requirements

There are no alternative requirements that need to be incorporated into the Title V Permit.

C. Insignificant Activities

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

D. Temporary Sources

The facility did not apply for a permit for any temporary sources.

E. Short-Term Activities

Not applicable.

F. Compliance Schedule/Progress Reports

The facility permit application did not indicate any non-compliance issues.

G. Emissions Trading

The facility is not involved in any emissions trading programs.

H. Acid Rain Requirements

The facility is subject to acid rain requirements. Title IV conditions are included in the permit.

I. Stratospheric Ozone Protection Requirements

The facility is subject to the Stratospheric Ozone Protection Requirements under Title VI of the CAAA of 1990. The facility has stated in their application that they are subject to 40 CFR 82, Subpart A, Appendices A and B.

J. Pollution Prevention

There are no pollution prevention requirements in this Title V permit.

K. Specific Conditions

Section 7.15 states the Cross State Air Pollution Rule (CSAPR, a federal rule) specified in 40 CFR 97 as an applicable requirement for the combustion turbines.

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.//