

Facility Name: **Naval Submarine Base Kings Bay**
City: Kings Bay
County: Camden
AIRS #: 04-13-039-00003

Application #: TV-758441
Date Application Received: August 30, 2023
Permit No: 9711-039-0003-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:**

Naval Submarine Base Kings Bay

2. Parent/Holding Company Name

United States Navy

3. Previous and/or Other Name(s)

None

4. Facility Location1063 USS Tennessee Avenue
Kings Bay 31547-2606 (Camden County)**5. Attainment, Non-attainment Area Location, or Contributing Area**

The facility is located in an attainment area for criteria air 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
9711-039-0003-V-04-0	March 11, 2019	Title V operating permit renewal

D. Process Description

1. SIC Codes(s)

9711

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 Naval Submarine Base in Kings Bay is primarily dedicated to supporting the logistical, maintenance, and training needs of the Atlantic Fleet TRIDENT submarines. Unlike manufacturing facilities, this installation does not engage in continuous product production.

3. Overall Facility Process Description

The main functions of Naval Submarine Base in Kings Bay, Georgia (NSB Kings Bay) are:

- Maintenance support and replenishment of TRIDENT submarines belonging to the Atlantic Fleet.
- Operations support for TRIDENT fleet and Kings Bay activities.
- Training support for TRIDENT submarine crews and other activities at Kings Bay.
- Personnel support for all fleet and shore-based personnel directly engaged in support of Atlantic Fleet strategic operations at Kings Bay.

As part of the operations, Kings Bay owns and operates several pieces of equipment which emit air pollution such as boilers, hot water heaters, auxiliary power generation facilities, backup generators, organic liquid storage tanks, vehicle fueling stations, surface coating operations, a chemical cleaning line, cold solvent degreasing units, abrasive blasting operations, woodworking shops, and other miscellaneous emissions units.

4. Overall Process Flow Diagram

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

E. Regulatory Status

1. PSD/NSR

This facility is classified as a minor stationary source as defined by in 40 CFR 52.21, Prevention of Significant Air Quality Deterioration (PSD). Specifically, the facility has fuel consumption limits geared towards keeping its potential to emit NO_x and SO₂ less than 250 tons per year each.

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

3. MACT Standards

The current operating permit, titled No. 9711-039-0003-V-04-0, sets limits to ensure that the Naval Submarine Base Kings Bay remains a synthetic minor source for hazardous air pollutants (HAPs). It limited HAP emissions to 10 tons year, or any combination of HAPs at a rate of 25 tons per year, as per 40 CFR 63.6585(b & c).

Due to these restrictions, the facility falls under the area source standards of Generally Available Control Technology (GACT). Specifically, the facility possesses 12 existing non-emergency generators (IC24 to IC35) and two generators (IC68 and IC69) that are subject to 40 CFR 63 Subpart ZZZZ, which addresses National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE). Additionally, the facility is subject to 40 CFR 63 Subpart CCCCCC, which is subject to National Emission Standards for Hazardous Air Pollutants for the Source Category: Gasoline Dispensing Facilities.

4. Program Applicability (AIRS Program Codes)

Program Code	Applicable (y/n)
Program Code 6 - PSD	No
Program Code 8 – Part 61 NESHAP	No
Program Code 9 - NSPS	Yes
Program Code M – Part 63 NESHAP	Yes
Program Code V – Title V	Yes

Regulatory Analysis

II. Facility Wide Requirements

A. Emission and Operating Caps:

Condition 2.1.1 in the current Title V operating permit No. 9711-039-0003-V-04-0 limits the facility's emissions of individual hazardous air pollutants (HAP) and the cumulative emissions of all hazardous air pollutants (HAPs) to remain below 10 and 25 tons per year, respectively. These limitations categorize the facility as an "area/synthetic minor" source for HAP emissions. Consequently, the facility is exempt from complying with the regulations pertaining to major sources of hazardous air pollutants as outlined in 40 CFR 63, National Emission Standards for Hazardous Air Pollutants.

B. Applicable Rules and Regulations

Facility-wide air quality applicable rules include the general requirements of 40 CFR 60, New Source Performance Standards (NSPS), and 40 CFR 63, National Emission Standards for Hazardous Air Pollutants (NESHAP). This is in addition to the general provisions of Georgia Rule 391-3-1-.02(2)(a) which are cited, primarily, in Section VIII of the enclosed permit.

C. Compliance Status

The facility has not indicated any non-compliance issues.

D. Permit Conditions

Condition 2.1.1 is carried over from the existing permit No. 9711-039-0003-V-04-0. The emissions of hazardous air pollutants (HAPs) enable the facility to retain its classification as an "area source" for HAP emissions under 40 CFR Part 63. Conditions 2.2.1 and 2.2.2, which also remain unchanged from the current permit No. 9711-039-0003-V-04-0, make reference to the relevant general provisions of the aforementioned New Source Performance Standards (NSPS) and National Emission Standards for Hazardous Air Pollutants (NESHAP).

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
EC01	Hot Water Heater No. 1 (55 MM Btu/hr)	391-3-1-.02(2)(d) 391-3-1-.02(2)(g)	None	None
EC02	Hot Water Heater No. 2 (55 MM Btu/hr)		None	None
EC03	Hot Water Heater No. 3 (55 MM Btu/hr)		None	None
IC024	Non-Emergency Generator (4,000 Hp - Compression Ignition Internal Combustion Engine (CI ICE))	40 CFR 63 Subpart ZZZZ 391-3-1-.02(2)(b)	CC01	Catalytic Oxidizer
IC025	Non-Emergency Generator (4,000 Hp - Compression Ignition Internal Combustion Engine (CI ICE))		CC02	Catalytic Oxidizer
IC026	Non-Emergency Generator (4,000 Hp - CI ICE)		CC03	Catalytic oxidizer
IC027	Non-Emergency Generator (4,000 Hp - CI ICE)		CC04	Catalytic Oxidizer
IC028	Non-Emergency Generator (4,000 Hp - CI ICE)		CC05	Catalytic Oxidizer
IC029	Non-Emergency Generator (4,000 Hp - CI ICE)		CC06	Catalytic Oxidizer
IC030	Non-Emergency Generator (4,000 Hp - CI ICE)		CC07	Catalytic Oxidizer
IC031	Non-Emergency Generator (4,000 Hp - CI ICE)		CC08	Catalytic Oxidizer
IC032	Non-Emergency Generator (4,000 Hp - CI ICE)		CC09	Catalytic Oxidizer
IC033	Non-Emergency Generator (3600 Hp - CI ICE)	40 CFR 63 Subpart ZZZZ 391-3-1-.02(2)(b)	CC10	Catalytic Oxidizer
IC034	Non-Emergency Generator (3,600 Hp - CI ICE)		CC11	Catalytic Oxidizer
IC035	Non-Emergency Generator (3,600 Hp - CI ICE)		CC12	Catalytic Oxidizer
IC68	Non-Emergency Generator (3,001 Hp - CI ICE)	40 CFR 60 Subpart IIII 391-3-1-.02(2)(b)	None	None
IC69	Non-Emergency Generator (3,001 Hp - CI ICE)		None	None
SC04	Open Painting – SWFLANT (Base Wide)	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	None	None
SC09	Open Painting – TRF Dry Dock Paint Shop		None	None
SC10	Open Painting – TRF Off Crew Painting		None	None
SC18	Open Painting – TRF (Base Wide)		None	None
SU12	Miscellaneous Solvent Use Operations – SUBASE	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	None	None
SU14	Miscellaneous Solvent Use Operations – SWFLANT		None	None
SU18	Miscellaneous Solvent Use Operations – TRF	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	None	None

Emission Units		Applicable Requirements/Standards	Air Pollution Control Devices	
ID No.	Description		ID No.	Description
SC021-A	Surface Coating Spray Paint Booths	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	SF21-A1 SF21-A2 SF21-A3 SF21-A4	Dry filter overspray collectors
SS021-B	Surface Coating Spray Paint Booths	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	SF21-B1 SF21-B2	Dry filter overspray collectors
SC021-C	Surface Coating Spray Paint Booths	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	SF21-C	Dry filter overspray collectors
AB011-A	Abrasive Blasting Booths	40 CFR 64 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH-A1 BH-A2	Cartridge type dust collectors
AB011-B	Abrasive Blasting Booths	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH-B1 BH-B2	Cartridge type dust collectors
AB011-C	Abrasive Blasting Booths	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH-C	Cartridge type dust collectors
FS001 FS003 FS017	Navy Exchange (NEX) Gasoline Dispensing Station (100,000 gallons of gasoline or more monthly throughput)	40 CFR 63 Subpart CCCCCC	None	None

Emission Units		Applicable Requirements/Standards	Air Pollution Control Devices	
ID No.	Description		ID No.	Description
EC01	Hot Water Heater No. 1 (55 MM Btu/hr)	391-3-1-.02(2)(d) 391-3-1-.02(2)(g)	None	None
EC02	Hot Water Heater No. 2 (55 MM Btu/hr)		None	None
EC03	Hot Water Heater No. 3 (55 MM Btu/hr)		None	None
IC024	Non-Emergency Generator (4,000 Hp - Compression Ignition Internal Combustion Engine (CI ICE))	40 CFR 63 Subpart ZZZZ 391-3-1-.02(2)(b)	CC01	Catalytic Oxidizer
IC025	Non-Emergency Generator (4,000 Hp - Compression Ignition Internal Combustion Engine (CI ICE))		CC02	Catalytic Oxidizer
IC026	Non-Emergency Generator (4,000 Hp - CI ICE)		CC03	Catalytic oxidizer
IC027	Non-Emergency Generator (4,000 Hp - CI ICE)		CC04	Catalytic Oxidizer
IC028	Non-Emergency Generator (4,000 Hp - CI ICE)		CC05	Catalytic Oxidizer
IC029	Non-Emergency Generator (4,000 Hp - CI ICE)		CC06	Catalytic Oxidizer
IC030	Non-Emergency Generator (4,000 Hp - CI ICE)		CC07	Catalytic Oxidizer
IC031	Non-Emergency Generator (4,000 Hp - CI ICE)		CC08	Catalytic Oxidizer
IC032	Non-Emergency Generator (4,000 Hp - CI ICE)		CC09	Catalytic Oxidizer
IC033	Non-Emergency Generator (3600 Hp - CI ICE)	40 CFR 63 Subpart ZZZZ	CC10	Catalytic Oxidizer

Emission Units		Applicable Requirements/Standards	Air Pollution Control Devices	
ID No.	Description		ID No.	Description
IC034	Non-Emergency Generator (3,600 Hp - CI ICE)	391-3-1-.02(2)(b)	CC11	Catalytic Oxidizer
IC035	Non-Emergency Generator (3,600 Hp - CI ICE)		CC12	Catalytic Oxidizer
IC68	Non-Emergency Generator (3,001 Hp - CI ICE)	40 CFR 60 Subpart IIII 391-3-1-.02(2)(b)	None	None
IC69	Non-Emergency Generator (3,001 Hp - CI ICE)		None	None
SC04	Open Painting – SWFLANT (Base Wide)	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	None	None
SC09	Open Painting – TRF Dry Dock Paint Shop		None	None
SC10	Open Painting – TRF Off Crew Painting		None	None
SC18	Open Painting – TRF (Base Wide)		None	None
SU12	Miscellaneous Solvent Use Operations – SUBASE		None	None
SU14	Miscellaneous Solvent Use Operations – SWFLANT		None	None
SU18	Miscellaneous Solvent Use Operations – TRF	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	None	None
SC021-A	Surface Coating Spray Paint Booths	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	SF21-A1 SF21-A2 SF21-A3 SF21-A4	Dry filter overspray collectors
SS021-B	Surface Coating Spray Paint Booths	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	SF21-B1 SF21-B2	Dry filter overspray collectors
SC021-C	Surface Coating Spray Paint Booths	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	SF21-C	Dry filter overspray collectors
AB011-A	Abrasive Blasting Booths	40 CFR 64 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH-A1 BH-A2	Cartridge type dust collectors
AB011-B	Abrasive Blasting Booths	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH-B1 BH-B2	Cartridge type dust collectors
AB011-C	Abrasive Blasting Booths	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	BH-C	Cartridge type dust collectors
FS001 FS003 FS017	Navy Exchange (NEX) Gasoline Dispensing Station (100,000 gallons of gasoline or more monthly throughput)	40 CFR 63 Subpart CCCCCC	None	None

B. Equipment & Rule Applicability

The facility operates 12 stationary non-emergency generators (IC24 through IC35) and two generators (IC68 and IC69) subject to 40 CFR 63 Subpart ZZZZ, with CI engines and each having a site rating exceeding 500 HP. Per 40 CFR 63.6595(a)(1), the 12 generators (IC24 through IC35) are considered existing "non-emergency" generators constructed before June 12, 2006.

The generators were required to comply with Subpart ZZZZ by May 3, 2013. Per 40 CFR 63.6603, compliance with the numerical emission limitations specified in Subpart ZZZZ relies on the results of testing, specifically the average of three 1-hour runs, following the testing requirements and

procedures outlined in 40 CFR 63.6620 and Table 4. Per 40 CFR 63.6604, owners of existing CI stationary RICE with more than 300 brake HP must use compliant diesel fuel.

Generators IC68 and IC69 fall under 40 CFR 63.6590(c)(1), subject to 40 CFR 60 Subpart IIII. Since they're rated at 3001 HP with 11.6 liters per cylinder displacement, they must meet emission standards for new marine CI engines in 40 CFR 1042. Additionally, they should use diesel fuel with a max sulfur content of 15 ppm, a cetane index of 40, or max aromatic content of 35%. Compliance involves purchasing certified engines and following manufacturer instructions. Emissions testing is the responsibility of manufacturers.

The facility has several emergency backup generators listed as Insignificant Activates, all built before June 12, 2006, and classified as existing emergency generators under 40 CFR 63 Subpart ZZZZ. These generators must meet requirements outlined in 40 CFR 63.6640(f)(1) through (4) and comply with Table 2d requirements for existing generators, such as oil and filter change every 500 hours or annually, air cleaner inspection every 1,000 hours or annually, and inspection of hoses and belts every 500 hours or annually.

Additionally, Subpart ZZZZ (40 CFR 63.6625(e)(3)), as addressed in Condition 8.17.1, requires from owners or operators of existing emergency or black start stationary RICE at area sources of HAP emissions to operate and maintain these units according to the manufacturer's emission-related instructions or develop their maintenance plan to minimize emissions in line with good air pollution control practices. Furthermore, Subpart ZZZZ provisions for existing and new emergency generators have been included in Conditions 3.3.2(b) and 3.3.3 to provide flexibility for their use, remaining part of the Insignificant Activities attached to this permit.

To avoid being subject of 40 CFR 63 Subpart JJJJJ, the current permit mandates that all hot water heaters and boilers within the facility must operate as "gas-fired" units as defined in 40 CFR Part 63, Subpart JJJJJ.

Furthermore, the facility has listed 79 units in the "Insignificant Activities List," falling under the category of "All petroleum liquid storage tanks storing a liquid with a true vapor pressure of equal to or less than 0.50 psia as stored." Additionally, 12 units are listed under "All petroleum liquid storage tanks with a capacity of less than 10,000 gallons storing a petroleum liquid. The inclusion of these 12 tanks in the "Insignificant Activities" classifies the facility as an existing gasoline dispensing facility (GDF) due to its involvement in loading gasoline storage tanks before November 9, 2006. Consequently, it becomes subject to 40 CFR 63 Subpart CCCCC, titled "National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities."

The facility is also subject to Georgia Air Quality Control Rules 391-3-1-.02(2)(e), governing Particulate Emission from Manufacturing Processes, and 391-3-1-.02(2)(b), addressing Visible Emissions. All hot water heaters fall under Rule 391-3-1-.02(2)(d), referred to as Fuel-burning Equipment, as they meet the definition of "fuel-burning equipment" outlined in Georgia Air Quality Control Rules 391-3-1-.02(1)(cc). In addition, fuel-burning equipment is subject to Georgia Rules 391-3-1-.02(2)(g), which pertains to Sulfur Dioxide. Georgia Rule (g) imposes restrictions on fuel-burning sources rated below 100 million BTU/hr, stipulating that they must burn fuel containing no more than 2.5% sulfur. This requirement is essentially encompassed by the more rigorous PSD avoidance limit and Generally Available Control Technology (GACT) rules.

C. Permit Conditions

Condition 3.2.1 and 3.2.2 limit the fuel usage to allow the facility to avoid 40 CFR 52.21, Prevention of Significant Deterioration of Air Quality.

Condition 3.2.3 limits only firing natural gas, propane, and fuel oil in the facility boilers and hot water heaters with a capacity of greater than 120 U.S. gallons to avoid being subject to 40 CFR Part 63, Subpart JJJJJJ.

Conditions 3.2.4, 3.2.5 and 3.2.6 limit diesel fuel combusted in Generators IC24- IC35 and Engine Generators IC68 and IC69 to avoid 40 CFR 52.21, Prevention of Significant Deterioration of Air Quality.

Condition 3.3.1 contains applicable emission standards/requirements for stationary compression ignition internal combustion engines (CI ICE) subject to 40 CFR Part 60, Subpart IIII at this facility.

Condition 3.3.2 was carried over from the current permit with minor edit in table 3.3.2a. This condition establishes the requirements operating limitations/requirements for engines subject to 40 CFR Part 63, Subpart ZZZZ.

Condition 3.3.3 was carried over from the current permit. However, requirements in 40 CFR 63.6640(f)(2)(ii) and 63.6640(f)(2)(iii) were removed and changed to reserved. This condition establishes operating requirements for emergency stationary CI ICEs under 40 CFR Part 63, Subpart ZZZZ.

Condition 3.3.4 establishes applicable operation and equipment requirements for all the subject gasoline dispensing equipment under 40 CFR 63 Subpart CCCCCC.

Both Conditions 3.4.1 and 3.4.2 were carried over from the current permit without any change. These conditions incorporate the applicable visible and PM emission limits under SIP Rules (b) and (e).

Condition 3.4.3 establishes the applicable PM and visible emission limits under SIP Rule (d).

Conditions 3.5.1 through 3.5.5 contains operating requirements for air pollution control devices to ensure proper function of the control devices.

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 general testing requirements for emission units subject to 40 CFR Part 60 standards and to 40 CFR Part 63 standards.

Conditions 4.2.2 and 4.2.3 contain respectively specific testing requirements under 40 CFR Part 63, Subparts ZZZZ and CCCCCC.

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

Conditions 5.2.1 and 5.2.2 ensure the proper function of the overspray dry filter and the dust collector systems since low pressure drop may indicate system leakage and high-pressure drop may indicate filter blockage.

Conditions 5.2.3 and 5.2.4 ensure compliance with the fuel standards in Conditions 3.2.1 and 3.3.1.

Conditions 5.2.5, 5.2.6 and 5.2.7 incorporate various monitoring requirements applicable to stationary CI ICEs subject to 40 CFR Part 63, Subpart ZZZZ.

Condition 5.2.8 incorporates applicable monitoring/record keeping and reporting requirements for the gasoline dispensing equipment subject to 40 CFR 63 Subpart CCCCCC at this facility.

The monthly usage monitoring/record keeping requirement for HAP-containing materials in Conditions 5.2.9 and 5.2.10 ensure the entire facility to remain an area source with regard to HAP emissions under 40 CFR Part 63.

Condition 5.2.11 contains monitoring/record keeping requirements for filtration media replacement and for incident of operation of any spray paint booths or abrasive blasting equipment without control. This condition ensures the compliance with the applicable visible and PM emission limits of Rules (b) and (e).

Monitoring monthly fuel oil combusted in Hot Water Heaters (EC01, EC02 and EC03) and in Generators (IC24 to IC32, IC33, IC34, IC35, IC68, IC69) is added in Condition 5.2.14. This condition ensures that the facility monitors the fuel combusted in water heaters and in the generators and complies with the PSD avoidance limits in Conditions 3.2.2, 3.2.4, 3.2.5, and 3.2.6.

C. Compliance Assurance Monitoring (CAM)

Under 40 CFR 64, known as the Compliance Assurance Monitoring Regulations (CAM), facilities must create and submit monitoring plans for specific emission units as part of their Title V application. Any emission unit controlled by a control device that has potential pre-control device emissions equal to or greater than 100 percent of the threshold for classification as a major source, as defined by 40 CFR §64.2(a)(3), falls under CAM requirements. The Abrasive Blasting Booth AB011-A, controlled by Cartridge-type dust collectors BH-A1 and BH-A2, falls into the category of pollutant-specific emission units (PSEU) subject to CAM. Conditions 5.2.12 and 5.2.13 outline the CAM monitoring requirements specifically for PM emissions from this emission source.

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

Condition 6.2.1 is a record keeping condition to calculate monthly HAP emissions. The facility is required to notify the Division if emissions of any individual HAP exceed 0.83 tons (10 tons/year divided by 12 months = 0.83 tons) or if emissions of all listed HAPs combined exceed 2.08 tons, during any calendar month (25 tons/year divided by 12 months = 2.08 tons). This was changed from the previous reporting thresholds of 0.74 tons individual HAP and 1.99 tons total HAPs to reflect the current limits. This condition is essential to maintain the facility as an area source with regard to HAP emissions under 40 CFR Part 63, as required by Condition 2.1.1.

Condition 6.2.2 requires calculating the twelve-month rolling total emissions of each listed hazardous air pollutant to maintain the facility as an area source with regard to HAP emissions under 40 CFR Part 63, as required by Condition 2.1.1.

Condition 6.2.3's record-keeping and reporting requirements of the usage of the fuel oil combusted in the hot waters and generators to ensure compliance with monitoring Condition 5.2.14 and fuel usage limits in Conditions 3.2.2, 3.2.4, 3.2.5, and 3.2.6 of this Permit.

Conditions 6.2.4 and 6.2.5 encompass record-keeping, reporting, and notification obligations as per 40 CFR 63 Parts ZZZZ and CCCCCC.

In Condition 6.2.6, the record-keeping stipulations guarantee that all boilers and hot water heaters at this facility operate as "gas-fired boilers," thereby exempting them from the requirements of 40 CFR 63, Subpart JJJJJ.

Condition 6.2.7 requires documentation of the activities undertaken at the Facility to demonstrate compliance with SIP Rule (n).

VII. Specific Requirements

A. Operational Flexibility

N/A

B. Alternative Requirements

None

C. Insignificant Activities

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

D. Temporary Sources

None

E. Short-Term Activities

None

F. Compliance Schedule/Progress Reports

None

G. Emissions Trading

N/A

H. Acid Rain Requirements

N/A

I. Stratospheric Ozone Protection Requirements

N/A

J. Pollution Prevention

N/A

K. Specific Conditions

None

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.//