

Facility Name: **KM Phoenix Holdings - Chattahoochee Terminal**  
City: Atlanta  
County: Fulton  
AIRS #: 04-13-121-00221

Application #: TV-549944  
Date Application Received: February 26, 2021  
Permit No: 5171-121-0221-V-06-0

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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:

KM Phoenix Holdings - Chattahoochee Terminal

2. Parent/Holding Company Name

KM Phoenix Holdings LLC

3. Previous and/or Other Name(s)

This facility was permitted in 1975 under the name Southeast Terminals. It contained separate storage tanks for different companies with shared loading racks and Southeast Terminals operated the facility. In 1991 a permit was issued to Unocal (doing business as Southeast Terminals) and in 1992 Louis Dreyfus Energy Corporation purchased this terminal and a new permit was issued under the Louis Dreyfus name. In January of 2000 Louis Dreyfus Energy became TransMontaigne Terminals Inc. The facility was permitted under 5171-121-0221-S-01-0, issued on January 24, 2000, and amendment No. 5171-121-0221-E-01-1, issued on December 9, 2002, increased gasoline throughput limit and made the facility a major source. Title V permit No. 5171-121-0221-V-02-0 was issued to TransMontaigne Terminals Inc. on June 2, 2005. BP Products North America, Inc. purchased this terminal and Permit No. 5171-121-0221-V-03-0 was issued, on March 14, 2006, to Chattahoochee BP Terminal. Permit No. 5171-121-0221-V-04-0 was issued on March 21, 2011, to BP Products North America Inc. – Atlanta Terminal.

On February 1, 2016, the facility was purchased by Kinder Morgan. Application No. 23791 was received on April 21, 2016 for the name change from BP Products North America Inc. – Atlanta Terminal to KM Phoenix Holdings - Chattahoochee Terminal. This Title V renewal, Permit No. 5171-121-0221-V-05-0, is being issued under the new facility name KM Phoenix Holdings - Chattahoochee Terminal.

4. Facility Location

3132 Parrott Avenue, N.W.  
Atlanta, Georgia 30318-3306

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

This facility is located in an area designated as a non-attainment area for ozone.

### **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
5171-121-0221-V-05-0	August 26, 2016	Title V Renewal
Off-Permit Change	May 1, 2017	To change the gasoline additive in Tank 863.
5171-121-0221-V-05-1	September 8, 2017	Installation of an internal floating roof in Tank 110
Off-Permit Change	April 26, 2018	Install an 8,000 gallon tank for storing a diesel fuel additive.
5171-121-0221-V-05-2	October 3, 2019	Installation of a carbon adsorption vapor recovery unit (VRU) as the primary control device for the existing loading rack.
Off-Permit Change	April 15, 2020	To change the fuel additives in Tank 98 and Tank 863.

### D. Process Description

#### 1. SIC Codes(s)

5171

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 is a petroleum products storage and distribution terminal.

#### 3. Overall Facility Process Description

This petroleum products storage and distribution terminal consists of twelve bulk petroleum storage tanks, nine smaller tanks or totes (additive, slop, etc.), a six-bay truck loading rack, one vapor recovery unit, and one vapor combustion unit. The terminal receives petroleum products

and denatured ethanol via pipeline and tanker truck and distributes petroleum products via tanker trucks. Volatile Organic Compounds (VOCs) emitted during tanker truck loading are controlled by the John Zink vapor recovery unit (VRU) and vapor combustion unit (VCU). Volatile organic compounds (VOC) and Hazardous Air Pollutant (HAP) emissions result primarily from loading trucks and storage tank losses.

#### 4. Overall Process Flow Diagram

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

### E. Regulatory Status

#### 1. PSD/NSR

Total tank storage at this facility is approximately 15.5 million gallons, which is equal to about 370,000 barrels. PSD regulations name petroleum storage facilities with total capacities of greater than 300,000 barrels as one of the 28 named categories of sources whose annual emissions make them a PSD major source if they exceed 100 tons. Since KM Phoenix Holdings - Chattahoochee Terminal is above this threshold, potential annual emissions for a pollutant emitted by this facility would only have to exceed 100 tons before it would be considered a major source for PSD purposes. Potential annual emissions of VOCs from this source have been estimated to be over 100 tons. However, actual emissions are only expected to be about 61 tons per year. These calculations were made using the permitted emission rate for the terminal of 15 mg/liter of gasoline loaded with a maximum annual throughput of 500,000,000 gallons. This facility would be considered a major source under PSD regulations; however, this facility is located in Fulton County which is part of the metro Atlanta ozone non-attainment area. Therefore, the nonattainment portion of the NSR regulations would be applicable instead of PSD, since VOCs are the major pollutant emitted and this is one of the two pollutants regulated for ozone non-attainment areas. On June 18, 2018, the nonattainment NSR permitting rules in 391-3-1.03(8) have been adjusted so that the major source threshold for NO<sub>x</sub> and VOC has been raised from 25 tpy to 100 tpy in the counties located in the nonattainment area.

#### 2. Title V Major Source Status by Pollutant

**Table 2: Title V Major Source Status**

Pollutant	Is the Pollutant Emitted?	If emitted, what is the facility's Title V status for the pollutant?		
		Major Source Status	Major Source Requesting SM Status	Non-Major Source Status
PM	Yes			✓
PM <sub>10</sub>	Yes			✓
PM <sub>2.5</sub>	Yes			✓
SO <sub>2</sub>	Yes			✓
VOC	Yes		✓	
NO <sub>x</sub>	Yes			✓
CO	Yes			✓

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
TRS	Yes			✓
H <sub>2</sub> S	Yes			✓
Individual HAP	Yes			✓
Total HAPs	Yes			✓

### 3. MACT Standards

This facility is a synthetic minor for HAPs, with estimated actual emissions of total HAPs at their allowable throughput of only about 5 tons per year. The facility is subject to 40 CFR 63 Subpart BBBBBB – “National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities.”

### 4. Program Applicability (AIRS Program Codes)

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

Emission and operating caps for this renewal permit are carried over from the existing permit, Permit No. 5171-121-0221-V-05-0.

Condition 2.1.1 limits individual HAP emissions to 10 tpy and total HAP emissions to 25 tpy for avoidance of MACT 40 CFR 63 Subpart R – “National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations).”

The facility has a limit on their annual throughput of gasoline of 500 million gallons, as well as the emission limitation of 20 mg of VOCs per liter of gasoline loaded. Both of those limits contribute in keeping the facility a minor source for HAPs, and therefore make the MACT for gasoline terminal standard, 40 CFR 63 Subpart R, inapplicable.

#### B. Applicable Rules and Regulations

Rule applicability for this renewal permit is based on the requirements for the emission units as permitted in existing Permit No. 5171-121-0221-V-05-0.

The facility wide applicable rules include Subpart A - “General Provisions” of 40 CFR 60 “Standards of Performance for New Stationary Sources,” and 40 CFR 63 – “National Emission Standards for Hazardous Air Pollutants for Source Categories.” The facility is also subject to the provisions of 40 CFR 63 Subpart R – “National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations),” that ensure exemption from this regulation.

#### C. Compliance Status

The facility has not indicated any non-compliance issues.

#### D. Permit Conditions

Permit conditions from the existing Title V permit, Permit No. 5171-121-0221-V-05-0, are carried over into this Title V permit without any changes, except as noted below.

Condition 2.1.1 limits individual HAP emissions to 10 tpy and total HAP emissions to 25 tpy for avoidance of MACT 40 CFR 63 Subpart R – “National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations).”

Conditions 2.2.1 and 2.2.2 establish the applicability of Subpart A - “General Provisions” of 40 CFR 60 – “Standards of Performance for New Stationary Sources” and 40 CFR 63 – “National Emission Standards for Hazardous Air Pollutants for Source Categories” to the facility.

Condition 2.2.3 requires the facility to comply with the provisions of 40 CFR 63 Subpart R – “National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations)," which assure continued exemption from the regulation.

### III. Regulated Equipment Requirements

#### A. Equipment List for the Process

Emission Units		Specific Limitations/Requirements	Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	ID No.	Description
101	Domed Floating Roof Tank	40 CFR 63 Subpart BBBBBB 391-3-1-.02(2)(a)(3) 391-3-1-.02(2)(bb)		Internal Floating Roof
102	Internal Floating Roof Tank			Internal Floating Roof
103	Domed Floating Roof Tank			Internal Floating Roof
104	Internal Floating Roof Tank			Internal Floating Roof
111	Domed Floating Roof Tank			Internal Floating Roof
112	Domed Floating Roof Tank			Internal Floating Roof
113	Domed Floating Roof Tank			Internal Floating Roof
108	Internal Floating Roof Tank	391-3-1-.02(2)(a)(3) 391-3-1-.02(2)(bb)		Internal Floating Roof
110	Internal Floating Roof Tank	40 CFR 60 Subpart Kb 40 CFR 63 Subpart BBBBBB 391-3-1-.02(2)(a)(3) 391-3-1-.02(2)(bb)	N/A	Internal Floating Roof
114	Internal Floating Roof Tank	40 CFR 60 Subpart K 40 CFR 63 Subpart BBBBBB 391-3-1-.02(2)(a)(3) 391-3-1-.02(2)(bb)		Internal Floating Roof
LR	Loading Rack	40 CFR 63 Subpart BBBBBB 391-3-1-.02(2)(cc) 391-3-1-.02(2)(ss) 40 CFR 64	VRU	Vapor Recovery Unit
			VCU	Vapor Combustion Unit (Flare)

\* 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

The Equipment and Rule applicability for this renewal permit is based on the requirements for the emission units as permitted in existing Permit No. 5171-121-0221-V-05-0.

Emission and Operating Caps:

The facility has a limit on their annual throughput of gasoline of 500 million gallons, as well as the emission limitation of 20 mg of VOCs per liter of gasoline loaded. Both of those limits contribute in keeping the facility a minor source for HAPs, and therefore make the MACT for gasoline terminal standard, 40 CFR 63 Subpart R, inapplicable.

The vapor control system is required to maintain a control efficiency of 90 percent and not have emissions that exceed 15 milligrams per liter of gasoline loaded at the terminal. The 90 percent control requirement is taken directly from Georgia Rule for Air Quality Control 391-3-1-.02(2)(cc);



and this Rule also requires that emissions not exceed 80 milligrams per liter of gasoline loaded. The 20 mg/liter limit has been taken voluntarily to make the facility a synthetic minor for HAPs, in conjunction with their gasoline and diesel throughput limits, which were carried over from the existing permit. The facility is a major source of VOCs emissions, however.

#### Rules and Regulations Assessment:

40 CFR 60 Subpart K, is a federal standard of performance for petroleum storage vessels constructed after June 11, 1973 and prior to May 19, 1978, that have storage capacities of greater than 40,000 gallons. Tank 114 meets these criteria and in accordance with 40 CFR 60.112(a)(1), it is equipped with an internal floating roof.

40 CFR 60 Subpart Kb is a federal standard of performance for petroleum storage vessels constructed, reconstructed, or modified after July 23, 1984 that have storage capacities of greater than 40 cubic meters (about 10,000 gallons). Tank 110 is subject to this rule and shall comply with the requirements for internal floating roof tanks.

The current permit contains conditions meant to assure continued exemption from the provisions of 40 CFR 63 Subpart R – “National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations).”

40 CFR 63 Subpart BBBBBB – “National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities,” applies to bulk gasoline terminals located at area sources. Since KM Phoenix Holdings - Chattahoochee Terminal is a petroleum products storage and distribution terminal and a minor source of HAPs, this rule is applicable.

Georgia Rule (bb) applies to tanks 101, 102, 103, 104, 111, 112, 113 and 114, because each of these tanks is equipped with an internal floating roof, has a capacity of more than 40,000 gallons and is capable of storing a product with a vapor pressure of greater than 1.52 psia.

The facility is subject to Georgia Rule (cc) because it is a gasoline terminal that receives gasoline by pipeline, dispenses it to trucks and has an average daily throughput of greater than 20,000 gallons. Accordingly, this facility is required to have a control system with an efficiency of at least 90 percent and an emission rate of no more than 80 milligrams per liter (4.7 grains per gallon) of gasoline loaded at the terminal (This requirement is not included in Condition 3.4.3, because the more stringent 20 milligram per liter limit will make them automatically comply with Rule (cc) emission rate limit). The facility is exempt from Rule (tt) because its VOC emissions fall under more specific State rules.

Georgia Rule (ss) applies to any entity involved in the loading or unloading of gasoline into gasoline transport vehicles and this is the primary business of facility. The Company, therefore, must take steps to make certain that they only load gasoline into tanker trucks that have passed a vapor tightness test to ensure that they do not leak. This rule is also automatically applicable to any facility that is subject to Rule (cc).

### C. Permit Conditions

Permit conditions from the existing Title V permit, Permit No. 5171-121-0221-V-05-0, are carried over into this Title V permit without any changes, except as noted below.

Condition 3.2.1 limits the annual throughput of gasoline to 500 million gallons, as well as the emission limitation of 20 mg of VOCs per liter of gasoline loaded. This condition also limits the Maximum Allowable Emissions for distillate products truck loading to 0.016 lb VOC/1,000 gallons transferred. Uncontrolled loading of distillate and heavier products is allowed and the resulting emissions may be calculated from AP-42. These limits keep the facility a minor source for HAPs, and therefore make the MACT for gasoline terminal standard, 40 CFR 63 Subpart R, inapplicable.

Condition 3.2.2 requires the control efficiency of the VRU and VCU to be no less than 90 percent.

Condition 3.2.3 requires the Permittee to operate the vapor processing system including the VRU or VCU, at all times.

Condition 3.3.1 requires the facility to comply with the applicable requirements of 40 CFR 60 Subpart K for the affected sources.

Conditions 3.3.2, 3.3.3, and 3.3.4 state the applicable emissions and performance standards as required by 40 CFR 63 Subpart BBBB.

Conditions 3.3.5, 3.3.6, and 3.3.7 state the detailed emissions and performance standards requirements for vapor collection systems in complying with 40 CFR 63 Subpart BBBB.

Condition 3.3.8 requires Storage Tank 110 to comply with all applicable provisions of 40 CFR 60 Subpart Kb.

Condition 3.4.1 is a state only condition that requires above ground tanks with a capacity of 40,000 gallons or greater used to store a petroleum liquid with a true vapor pressure of 1.5 psia or greater, to be painted with a paint of a heat-reflective nature when repainted.

Condition 3.4.2 requires the facility to comply with the requirements of Georgia Rule (bb).

Condition 3.4.3 requires the facility to comply with the requirements of Georgia Rule (cc).

Condition 3.4.4 requires the facility to comply with the requirements of Georgia Rule (ss).

Condition 3.5.1 requires the facility to perform routine maintenance on all air pollution control equipment.

Condition 3.5.2 requires the facility to keep an inventory of spare parts for the control equipment.

**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 conditions from the existing Title V permit, Permit No. 5171-121-0221-V-05-0, are carried over into this Title V permit without any changes, except as noted below.

Condition 4.2.1 requires testing for any new or modified equipment subject to the “New Source Performance Standards” or “National Emission Standards for Hazardous Air Pollutants for Source Categories.”

## **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 from the existing Title V permit, Permit No. 5171-121-0221-V-05-0, are carried over into this Title V permit without any changes, except as noted below.

Condition 5.2.1 requires the facility to operate a heat-sensing device, acceptable to the Director, such as a UV beam sensor or thermocouple, to continuously indicate and record the presence of a flame in the vapor combustor unit (VCU).

Condition 5.2.2 requires the facility to check the vapor collection system's pressure and make note of any instances where the system pressure exceeded the allowable limit.

Condition 5.2.3 requires the use of an electronic interlock control system to detect improper operation of the loading rack control device, has been modified to remove references to the carbon adsorption bed and add requirements for the VCU flare.

Condition 5.2.4 states the monitoring requirements as required by 40 CFR 63 Subpart BBBBBB.

Conditions 5.2.5 and 5.2.6 contain the applicable Compliance Assurance Monitoring (CAM) requirements.

Conditions 5.2.7, 5.2.8, and 5.2.9 state the detailed monitoring requirements for internal floating roof tanks complying with 40 CFR 63 Subpart BBBBBB.

Condition 5.2.10 requires the facility to determine maximum true vapor pressure of material contained in Tank 110.

Condition 5.2.11 requires the facility to maintain a breakthrough detector and interlock system to continuously monitor and indicate the hydrocarbon concentration at the outlet of the vapor recovery unit.

Condition 5.2.12 requires the facility to continuously track the vapor staging valve's position as an integral part of the interlock system required by Condition 5.2.11.

Condition 5.2.13 requires the facility to maintain a continuous monitoring system (CMS), on the VRU.

### C. Compliance Assurance Monitoring (CAM)

CAM requirements from the existing Title V permit, Permit No. 5171-121-0221-V-05-0 are carried over into this Title V permit without any changes, except as noted below.

Each emission unit controlled by a control device that "has potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than 100 percent of the amount, in tons per year, required for a source to be classified as a major source," as defined by 40 CFR 64.2(a)(3) is subject to CAM. Specifically, the following pollutant specific emission units (PSEU) were found to be subject to the Compliance Assurance Monitoring:

<b>Emission Unit</b>	<b>Pollutant</b>
Loading Rack (LR)	VOC

Conditions 5.2.5 and 5.2.6 include the CAM requirements for the emissions unit listed in Section 3.1 which is equipped with a CAM subject "control device," as defined by 40 CFR 64.1.

## **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 from the existing Title V permit, Permit No. 5171-121-0221-V-05-0, are carried over into this Title V permit without any changes, except as noted below.

Condition 6.2.1, requires the facility to keep records of shutdowns, malfunctions, and maintenance on the vapor control systems and incidents of breakthrough.

Conditions 6.2.2 and 6.2.3 require the facility to keep records of monthly throughputs and tank storage data.

Condition 6.2.4 requires the facility to comply with the notification, reporting, and recordkeeping requirements of 40 CFR 60 Subpart A, K, and Kb.

Conditions 6.2.5, 6.2.6, and 6.2.7 require the facility to comply with the notification, reporting, and recordkeeping requirements of 40 CFR 63 Subpart BBBBBB.

Condition 6.2.8 requires the facility to record the dimensions and the volatile liquid store in Tank 110.

Conditions 6.2.9 and 6.2.10 requires the facility to maintain records of each inspection performed as required by Conditions 5.2.7 and 5.2.8, and the provisions of a report to be furnished in the event any failures are detected.

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

In the existing Title V permit the facility had requested the ability to store any refined petroleum product or ethanol within its tanks. Those requests were reflected in Condition 3.2.1 and the facility description on the permit cover page. These have been carried over into this Title V permit.

**B. Alternative Requirements**

- Not 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**

- Not Applicable

**F. Compliance Schedule/Progress Reports**

- Not Applicable

**G. Emissions Trading**

- Not Applicable

**H. Acid Rain Requirements**

- Not Applicable

**I. Stratospheric Ozone Protection Requirements**

- Not Applicable

**J. Pollution Prevention**

- Not Applicable

## K. Specific Conditions

- Not 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.//