

Facility Name: **Chevron Products Company – Doraville Terminal**  
 City: Doraville  
 County: DeKalb  
 AIRS #: 04-13-089-00100

Application No: TV-583852  
 Date Application Received: July 29, 2021  
 Permit No: 5171-089-0100-V-05-0

<b>Program</b>	<b>Review Engineers</b>	<b>Review Managers</b>
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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: Chevron Products Company – Doraville Terminal

2. Parent/Holding Company Name

Chevron Products Company

3. Previous and/or Other Name(s)

None known

4. Facility Location

4026 Winters Chapel Road  
Doraville, Georgia 30360 (DeKalb County)

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
5171-089-0100-V-04-0	January 30, 2017	3 <sup>rd</sup> Title V Renewal Permit

### D. Process Description

1. SIC Codes(s)

5171: Petroleum Bulk Stations and Terminals

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 bulk storage and terminal operation.

## 3. Overall Facility Process Description

This facility is a bulk gasoline terminal, which receives product by underground pipeline and dispenses it through a truck loading rack to tank trucks/cargo tanks where the product is delivered to gasoline dispensing facilities (gas stations). The facility's significant emission sources consist of 8 storage tanks. In addition to these tanks, there are 14 tanks included in the application as insignificant activities units, which are currently empty or store diesel fuel, water or additives. The tanks, which are currently empty, may store diesel fuel in the future, retaining their insignificant emission unit status. The facility also has a truck loading rack with four (4) product delivery bays, one (1) vapor recovery unit (VRU) controlling emissions from the loading rack, and fugitive emission sources. The loading rack is equipped with safety features to prevent spills and is automatically shut down if the safety devices sense a spill or sense that that a spill may occur.

Emissions of concern are volatile organic compound (VOC) emissions including Hazardous Air Pollutant (HAP) compounds resulting primarily from truck loading and storage tank losses (fugitive emissions). The facility's operating schedule is 24 hours per day, 7 days per week.

## 4. Overall Process Flow Diagram

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

## E. Regulatory Status

### 1. NAA/NSR

This facility is located in the Metro Atlanta Marginal Ozone Non-Attainment Area (NAA). NAA/NSR regulations apply to this facility. Pertinent NAA/NSR regulations name petroleum storage facilities whose potential annual emissions of VOC and/or NO<sub>x</sub> exceed 100 tons major sources. Potential annual VOC emissions from Chevron Doraville Terminal are above this threshold. Therefore, this facility is considered a major source under pertinent NAA/NSR regulations. The NO<sub>x</sub> emissions from the facility, however, are less than 100 tons per year.

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 <sub>10</sub>				
PM <sub>2.5</sub>				
SO <sub>2</sub>				
VOC	✓	✓		
NO <sub>x</sub>				
CO				
TRS				
H <sub>2</sub> S				
Individual HAP	✓			✓
Total HAPs	✓			✓

3. MACT Standards

This facility is considered an “area source” under Section 112 of the Clean Air Act (CAA) for having potential emissions of any single HAP and of combined HAPs less than 10 tons and 25 tons per year respectively. The facility is subject to NESHAP GACT (Generally Available Control Technology) standards under 40 CFR 63 Subpart BBBBBB - “*National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities.*”

NESHAP Subpart R - “*National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Station),*” applies to bulk gasoline terminals that are a major source of HAP or have a calculated emissions screening factor (determined using equation per 40 CFR 63.420(a)(1)) greater than 1. NESHAP Subpart R does not apply because this facility is minor for HAPs. The maximum total HAPS are shown to be less than 2 tons per year, which is below the 25 ton per year major source threshold.

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:

The facility shall not discharge or cause the discharge into the atmosphere any single hazardous air pollutant (HAP) listed in Section 112 of the Clean Air Act, in an amount equal to or exceeding 10 tons (or any lesser quantity for a single hazardous air pollutant that EPA may establish by regulation) during any 12 consecutive months, or any combination of such listed pollutants in an amount equal to or exceeding 25 tons during any 12 consecutive months. The application shows that HAP emissions from the facility are less than the 10/25 ton per year major source thresholds. As a minor source for HAPs, the facility will not be subject to 40 CFR 63 Subpart R – *“National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Station).”*

#### 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. 5171-089-0100-V-04-0.

This facility is subject to 40 CFR 60 Subpart K - *“Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978”*, Subpart Kb - *“Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984”* and Subpart XX - *“Standards of Performance for Bulk Gasoline Terminals”*. Therefore, this facility is also subject to the applicable provisions of 40 CFR 60 Subpart A - *“General Provisions”*.

As an area source of HAP emissions, this facility is subject to the GACT gasoline terminal standard, 40 CFR 63 Subpart BBBB - *“National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities.”*

The current permit contains limited recordkeeping and reporting requirements under 40 CFR 63 Subpart R - *“National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Station).”* In the 2005 permit renewal it was determined that the facility was a minor source of HAPs; therefore, 40 CFR 63 Subpart R was not applicable. In the 2011 permit renewal a recordkeeping requirement for 40 CFR 63 Subpart R was added to the permit. Since the facility is a minor source for HAPs, all Subpart R requirements have been removed in this renewal permit. As previously discussed, a facility wide HAP limit has been added to the permit to ensure that the facility remains a minor HAP source.

### C. Compliance Status

The facility is operating in compliance with all rules or regulations.

### D. Permit Conditions

Permit conditions from the current Title V Permit No. 5171-089-0100-V-04-0 (this permit has no amendments) are carried over into this Title V permit without any changes.

Condition 2.1.1 establishes a facility wide 10/25 ton per year HAP limit for individual and total HAPs. This condition ensures that the facility remains a minor source for HAP emissions for avoidance of 40 CFR 63 Subpart R.

Condition 2.2.1 establishes the applicability of Subpart A - "*General Provisions*" of 40 CFR 63 – "*National Emission Standards for Hazardous Air Pollutants for Source Categories*" to the facility.

Condition 2.2.2 establishes the applicability of 40 CFR 60 Subpart A - "*General Provisions*" of 40 CFR 60 – "*Standards of Performance for New Stationary Sources,*" to the facility.

### III. Regulated Equipment Requirements

Chevron’s bulk terminal has a “safe fill” storage capacity of 20,261,682 gallons (482,421 barrels). The facility's significant emission sources consist of 8 storage tanks. In addition to these tanks, there are 14 tanks included in the application as insignificant activities units, which are currently empty or store diesel fuel, water, or additives. The 14 tanks, which are currently empty, may store diesel fuel in the future, retaining their insignificant emission unit status. The facility also has a truck loading rack with 4 product delivery bays, 1 vapor recovery unit (VRU) controlling emissions from the loading rack, and fugitive emission sources. The loading rack is equipped with safety features to prevent spills and is automatically shut down if the safety devices sense a spill or sense that a spill may occur.

The terminal receives petroleum products by pipeline and ships product by tank trucks to retailers and bulk plants. VOC and HAP emissions result primarily from truck loading and storage tank losses (fugitive emissions). The facility’s operating schedule is 24 hours per day, 7 days per week.

#### A. Equipment List for the Process

Emission Units		Applicable Requirements/Standards	Air Pollution Control Devices	
ID No.	Description		ID No.	Description
T003	Tank No. 3 (Ethanol Tank)	391-3-1-.02(2)(bb) 391-3-1-.02(2)(a)(3)	N/A	Internal Floating Roof
T010	Tank No. 10 (Fixed Roof Tank Storing Transmix)	None	N/A	Fixed Roof
T012	Tank No. 12 (Internal Floating Roof Tank)	391-3-1-.02(2)(bb) 391-3-1-.02(2)(a)(3) 40 CFR 60 Subpart Kb 40 CFR 63 Subpart BBBB	N/A	Internal Floating Roof
T015	Tank No. 15 (Fixed Roof Tank storing Transmix)	None	N/A	Fixed Roof
T021	Tank No. 21 (Domed Internal Floating Roof Tank)	391-3-1-.02(2)(bb) 391-3-1-.02(2)(a)(3) 40 CFR 63 Subpart BBBB	N/A	Domed Internal Floating Roof
T027	Tank No. 27 (Fixed Roof Tank storing Transmix)	None	N/A	Fixed Roof
T028	Tank No. 28 (Internal Floating Roof Tank)	391-3-1-.02(2)(bb) 391-3-1-.02(2)(a)(3) 40 CFR 60 Subpart K 40 CFR 63 Subpart BBBB	N/A	Internal Floating Roof
T029	Tank No. 29 (Internal Floating Roof Tank)	391-3-1-.02(2)(bb) 391-3-1-.02(2)(a)(3) 40 CFR 60 Subpart K 40 CFR 63 Subpart BBBB	N/A	Internal Floating Roof
LR01	Product Loading Rack	391-3-1-.02(2)(cc) 40 CFR 60 Subpart XX 40 CFR 63 Subpart BBBB	C001	Vapor Recovery Unit (VRU)
	Gasoline Transport Vehicles/Cargo Tank/Tank Truck	391-3-1-.02(2)(ss)		

## B. Equipment & Rule Applicability

Equipment and rule applicability for this renewal permit is based on the requirements for the emission units as permitted in current Permit No. 5171-089-0100-V-04-0.

### Emission and Operating Caps:

In the current permit, Permit No. 5171-089-0100-V-04-0, the vapor control system is required to maintain a control efficiency of 90 percent, as required by Georgia Rule (cc). Georgia Rule (cc) also requires that VOC emissions from the facility shall not exceed 4.7 grains per gallon or 0.67 lb./1000 gallons of gasoline transferred (80.0 mg/liter of gasoline transferred).

40 CFR 60 Subpart XX limits VOC emissions to 35 milligrams per liter of gasoline loaded. This is more stringent than the 80 mg/ liter limit in Georgia Rule (cc).

### Rules and Regulations Assessment:

40 CFR 60 Subpart K is a federal new source performance standard (NSPS) for petroleum storage vessels that were constructed after June 11, 1973, and prior to May 19, 1978, and have storage capacities of greater than 40,000 gallons. Tanks T028 and T029 meet these criteria, and therefore are subject to NSPS Subpart K. Each tank is equipped with a floating roof, as required to comply with Subpart K.

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 T012 is subject to this rule and shall comply with the requirements for internal floating roof tanks.

40 CFR 60 Subpart XX applies to any gasoline terminal constructed or modified after December 17, 1980. The facility must meet the emission limit for this regulation of 35 milligrams (of VOCs) per liter of gasoline loaded. In addition to the emission limit, this regulation requires certain equipment standards to ensure a vapor tight loading system and requires that the terminal only load gasoline into tanks that have been tested and shown to be vapor tight. Record keeping ensuring compliance with these requirements is also required.

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.”*

Georgia Rule (bb) applies to tanks T003, T021, T028 and T029, since each of these tanks has a capacity of more than 40,000 gallons and can store a product with a vapor pressure of greater than 1.52 psia (i.e., they are equipped with internal floating roofs).

Georgia Rule (cc) applies to all gasoline terminals in the State and covers the terminal or loading rack portion of this facility. Gasoline terminal is defined in the Rule as a facility which receives gasoline by pipeline, dispenses it to trucks and has an average daily throughput of greater than 20,000 gallons. Chevron Products Company – Doraville Terminal meets all these criteria and

therefore must have a control system with an efficiency of at least 90 percent and a VOC emission rate of no more than 4.7 grains per gallon (80 milligrams per liter) of gasoline loaded at the terminal.

Georgia Rule (ss) applies to any entity involved in the loading or unloading of gasoline into gasoline transport vehicles, which is Chevron Products Company – Doraville Terminal's primary business at this facility. The facility must, therefore, take steps to ensure that the terminal only loads gasoline into tanker trucks that have passed a vapor tightness test to ensure that the tanks trucks do not leak. Rule (ss) is also automatically applicable to any facility that is subject to Rule (cc).

### C. Permit Conditions

Permit conditions from the current Title V permits, Permit No. 5171-089-0100-V-04-0 are carried over into this Title V permit without any changes.

Condition 3.2.1 limits VOC emissions from the control equipment to not exceed 35 milligrams of total organic compounds per liter of gasoline loaded (0.292 lb. of total organic compounds per 1,000 gallons), in accordance with 40 CFR 60 Subpart XX.

Condition 3.3.1 requires the facility to comply with the applicable requirements of 40 CFR 60 Subpart K for Tanks T028 and T029.

Condition 3.3.2 requires Tank T012 to comply with the applicable requirements of 40 CFR 60 Subpart Kb.

Condition 3.3.3 contains the applicable requirements of 40 CFR 60 Subpart XX.

Conditions 3.3.4 and 3.3.5 incorporate the applicable emissions and performance standards as required by 40 CFR 63 Subpart BBBB.

Condition 3.4.1 is a State only enforceable condition requiring the facility to use paint of a heat-reflective nature when repainting tanks.

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. This is a standard permit condition in similar sources.

**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 current Title V permit, Permit No. 5171-089-0100-V-04-0 have been carried over into this Title V permit without any changes.

Condition 4.2.1 requires testing for any new or modified equipment subject to the “*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 current Title V permits, Permit No. 5171-089-0100-V-04 have been carried over into this Title V permit without any changes.

Condition 5.2.1 requires the use of a breakthrough detector and an interlock control system to prevent gasoline loading operations when proper conditions are not met.

Condition 5.2.2 requires the facility to install a pressure measurement device on each terminal's vapor recovery system. The citation has been modified to include references to 40 CFR 60 Subpart XX.

Conditions 5.2.3 and 5.2.4 requires a system to monitor collection system pressures/vacuums and indicate when system vents or safety-relief valves are opened.

Condition 5.2.5 requires monthly leak inspections of the vapor collection processing system and loading racks.

Conditions 5.2.6 and 5.2.7 contain the applicable Compliance Assurance Monitoring (CAM) requirements.

Condition 5.2.8 requires a continuous monitoring system under 40 CFR 63 Subpart BBBBBB.

Condition 5.2.9 requires tank inspections or testing in accordance with 40 CFR 63 Subpart BBBBBB. This condition does not contain requirements regarding external floating roof tanks and tanks with a closed vent system and control device, since none of the tanks involved at the facility has such configuration.

Condition 5.2.10 establishes the monitoring/operating requirements for the vapor processing systems/carbon adsorption system at this facility under 40 CFR 63 Subpart BBBBBB. Paragraph a of this condition specifies operating the system such that the hydrocarbon concentration does not exceed 1.75 percent, as elected by the facility.

Conditions 5.2.11, 5.2.12, and 5.2.13 contain the applicable monitoring requirements for 40 CFR 60 Subpart Kb. In accordance with 40 CFR 60.116b, the facility is required to monitor the maximum true vapor pressure for product in Tank T012. Tank T012 will be inspected on a routine basis (each year or once each 10 years) to ensure that all equipment needed to contain VOL emissions is operating as designed or specified by the regulation.

### C. Compliance Assurance Monitoring (CAM)

CAM requirements from the existing Title V permit, Permit No. 5171-089-0100-V-04-0 have been carried over into this Title V permit without any changes.

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>
Tanker Truck Loading Rack	VOC

Conditions 5.2.6 and 5.2.7 contain the applicable Compliance Assurance Monitoring (CAM) requirements.

## 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 or semiannual] basis.

### B. Specific Record Keeping and Reporting Requirements

Permit conditions from the existing Title V permits, Permit No. 5171-089-0100-V-04-0 have been carried over into this Title V permit without any changes.

6.2.1 and 6.2.2 require the facility to maintain records of HAP emissions to demonstrate that the facility is a minor source of HAPs for avoidance of 40 CFR 63 Subpart R requirements.

Condition 6.2.3 requires the facility to keep records of the monthly leak inspections in accordance with 40 CFR 60 Subpart XX.

Condition 6.2.4 requires the facility to keep record of any shutdowns, malfunctions, and subsequent maintenance on the vapor control system in accordance with Georgia Rule (cc).

Condition 6.2.5 requires the facility to keep record of each leak that is detected during inspections, each time the cargo tank is not vapor-tight, each time no attempt was made to repair a leak within 5 days, and each time there are emissions from opening any pressure vacuum vent on the terminal's vapor collection system, has been modified to include references to 40 CFR 60 Subpart XX.

Condition 6.2.6 requires the facility to keep records of the continuous monitoring data in accordance with Georgia Rule (cc).

Condition 6.2.7 contains recordkeeping and reporting requirements under 40 CFR 63 Subpart BBBBBB.

Condition 6.2.8 requires the facility to keep a record of occurrence and duration of malfunctions and the corrective actions taken in accordance with 40 CFR 63 Subpart BBBBBB.

Condition 6.2.9 requires the facility to report the number, duration, and a brief description of each type of malfunction that occurred and the actions taken during a malfunction of an affected source to minimize emissions in accordance with 40 CFR 63 Subpart BBBBBB.

Condition 6.2.10 requires the submission of the Notice of Compliance Status information under 40 CFR 63 Subpart BBBBBB.

Conditions 6.2.11, 6.2.12, 6.2.13, 6.2.14, and 6.2.15 contain the applicable recordkeeping and reporting requirements for 40 CFR 60 Subpart Kb. The facility shall keep records of dimensions, capacity, and volatile organic liquid (VOL) stored in Tank T012. The facility shall maintain records of tank inspections and submit notifications for any failures as required.

**VII. Specific Requirements**

A. Operational Flexibility

Not applicable

B. Alternative Requirements

Not applicable

C. Insignificant Activities

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

D. Temporary Sources

None

E. Short-Term Activities

Tank Cleaning - One day as needed  
Tank painting – One week as needed

F. Compliance Schedule/Progress Reports

None

G. Emissions Trading

None

H. Acid Rain Requirements

Not applicable

I. Stratospheric Ozone Protection Requirements

Not applicable

J. Pollution Prevention

Not applicable

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.//