

Facility Name: **Doraville I Terminal – Buckeye SE Terminals LP**
City: Doraville
County: DeKalb
AIRS #: 04-13-089-00085

Application #: TV-583938
Date Application Received: July 20, 2021
Permit No: 5171-089-0085-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:

Doraville I Terminal – Buckeye SE Terminals LP

2. Parent/Holding Company Name

Buckeye SE Terminals LP

3. Previous and/or Other Name(s)

Magellan Terminal Holdings, L.P. - Doraville I Terminal; Phillips Pipeline Company; Phillips Petroleum Company & Williams Energy Ventures

4. Facility Location

4149 Winters Chapel Road
Doraville, Georgia 30360 (DeKalb County)

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

Facility is located in an area designated as non-attainment for ozone. The area has been designated as non-attainment for the 8-hour ozone national ambient air quality standards (NAAQS).

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
5171-089-0085-V-05-0	January 25, 2017	4 th Title V operating permit renewal

D. Process Description

1. SIC Codes(s)

Major - 5171

Other - 4226

5171 is the SIC code for establishments primarily engaged in the wholesale distribution of petroleum products. It is from this activity that most of the air emissions from this facility are emitted. SIC Code 4226 represents petroleum and chemical bulk terminals for hire. However, for air quality permitting issues, 5171 is the preferred number. 4226 is listed above as another SIC code for this facility.

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 products handled by this facility include gasoline, distillate oil and additives to gasoline and distillate oil. The facility has permit to handle and blend ethanol and butane with gasoline and distillate oil if required by federal regulations.

3. Overall Facility Process Description

The facility is comprised of 5 storage tanks for the handling and storage of ethanol in addition to other petroleum products. Three of the tanks are internal floating roof tanks and the other two are external floating roof tanks. There is a gasoline loading rack (FLRK) with associated fuel vapor collecting and processing systems. Currently the facility operates a carbon adsorption vapor recovery unit (VRU) as a primary control system for volatile organic compounds (VOCs) emissions from transfer of gasoline at FLRK. The facility also has a vapor combustion unit (VCU) as a standby to control the VOC emissions from FLRK.

4. Overall Process Flow Diagram

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

E. Regulatory Status

1. NAA/NSR

The facility's initial Title V Permit narrative indicates that potential VOC from this source was calculated to be less than 190 tpy in October 1999. The VOC emissions from gasoline loading are limited to 20 mg/liter of gasoline loaded. In combination of the required control efficiency of no less than 90% for VOC emissions during gasoline transfer and the annual ethanol loading limit of 85,176,00 gallons, these emission limits have allowed the facility to avoid New Source Review (NSR) during previous modifications. Since the facility is located in the Metro Atlanta Marginal Ozone Non-Attainment Area (NAA), NAA/NSR regulations apply to this facility. Having potential to emit more than 100 tons per year (tpy) of VOCs, this facility is a major source of VOC emission under pertinent NAA/NSR rules. The potential emissions of nitrogen oxides (NO_x) from the facility are less than 100 tpy. NO_x is the second regulated pollutant for ozone non-attainment areas.

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	n/a			
H ₂ S	n/a			
Individual HAP	✓			✓
Total HAPs	✓			✓

3. MACT Standards

The potential individual and total HAP emissions from the facility are less than 10 and 25 tons per year respectively. However, applicability for 40 CFR Part 63, Subpart R, "*National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations)*" is determined by calculating an emission screening factor (E_T) for each facility. If the value of E_T is less than 1, then the facility is not subject to 40 CFR part 63, Subpart R. The E_T for this facility was calculated to be less than 1, therefore, Subpart R is not applicable to this facility. Consequently, this 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	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:

None applicable

B. Applicable Rules and Regulations

The facility shall comply with the provisions of 40 CFR 63, Subpart R that assure continued non-applicability of the subpart and continue to maintain its area/minor source status. Emission Screening Factor E_T calculations are not needed for this facility as long as it complies with applicable record keeping and notification requirements for determination of E_T as specified in 40 CFR 63, Subpart R.

C. Compliance Status

Review of the Title V permit application No. TV-583938 indicates that the facility is operating in compliance with all applicable rules and regulations.

D. Permit Conditions

Condition 2.2.1 is carried over from the current Title V operating permit. This condition requires this facility to comply with applicable record keeping and notification provisions of 40 CFR 63, Subpart R that assure continued non-applicability of the subpart.

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
T301	Internal Floating Roof Tank	391-3-1-.02(2)(bb), 391-3-1-.02(2)(vv) 40 CFR 60 Subpart K	n/a	Mechanical shoe primary seal, Wiper secondary seal.
T401	External Floating Roof Tank	391-3-1-.02(2)(nn) 40 CFR 63 Subpart BBBB		Mechanical shoe primary seal, wiper secondary seal.
T501	External Floating Roof Tank	391-3-1-.02(2)(nn) 40 CFR 63 Subpart BBBB		Mechanical shoe primary seal, wiper secondary seal
T503	Internal Floating Roof Tank	391-3-1-.02(2)(bb), 40 CFR 60 Subpart Kb 40 CFR 63 Subpart BBBB		Mechanical shoe primary seal, wiper secondary seal
T-601	Internal Floating Roof Tank	391-3-1.02(2)(vv), 391-3-1-.02(2)(bb), 40 CFR 60 Subpart Kb 40 CFR 63 Subpart BBBB		Mechanical shoe primary seal, rim-mounted secondary seal
FLRK-1	Gasoline Loading Rack	391-3-1-.02(2)(ss) 391-3-1-.02(2)(cc) 40 CFR 63 Subpart BBBB	VRU VCU	Vapor Recovery Unit (VRU; primary control) Vapor Combustion Unit (VCU; standby control)

B. Equipment & Rule Applicability

Georgia Rule (bb), “*Petroleum Liquid Storage*”, applies to Tanks T301, T503 and T601, since each has a capacity of more than 40,000 gallons and is used to store a product with a vapor pressure of greater than 1.52 psia. These are fixed roof tanks equipped with internal floating roofs.

Georgia Rule (cc), “*Bulk Gasoline Terminals*”, applies to this facility. Rule (cc) requires this bulk gasoline terminal to be equipped with vapor collection and control system(s) capable of complying with the applicable requirements of Rule (cc). Rule (cc) requires (1): the control efficiency of the VRU and VCU to be maintained at no less than 90% during the transfer of gasoline; and (2) the mass emissions of VOC from the vapor control system including the VRU and the VCU to be no greater than 80 milligrams per liter of gasoline loaded. No person can load gasoline into any tank trucks or trailers from this bulk gasoline terminal unless the vapor collection and control system(s) is in operation.

Georgia Rule (nn), “*VOC Emissions from External Floating Roof Tanks*”, applies to storage tanks with storage capacities of greater than 40,000 gallons that are equipped with external floating roofs. As required by Rule (nn), both Tanks T401 and T501 have secondary seals on their roofs that meet the requirements of Rule (nn).

Georgia Rule (ss), “*Gasoline Transport Vehicles and Vapor Collection Systems*”, applies to the existing Gasoline Loading Rack, FLRK. FLRK has been constructed and operated to prevent the escape of gasoline or gasoline vapors while loading by using a vapor collection and control system that meets the requirements of Rule (nn).

Georgia Rule 391-3-1-.02(2)(vv), “*Volatile Organic Liquid Handling and Storage*”, applies to facilities subject to other requirements under 391-3-1-.02(2), and requires that any stationary storage tanks with a capacity greater than 4,000 gallons be equipped with a submerged fill pipe for transfer of volatile organic liquids other than gasoline. Any storage tank transferring chemicals such as ethanol at this facility is required by Rule (vv) to be equipped with a submerged fill pipe.

Choose the applicable option(s) below:

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*”, applies to for petroleum storage vessels constructed after June 11, 1973, and prior to May 19, 1978 (when Subpart Ka went into effect) that have storage capacities of greater than 40,000 gallons. Tank T301 has been equipped with a floating roof that meets the applicable structural and operational requirements under Subpart K.

40 CFR 60, 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*”, applies to petroleum storage vessels constructed after July 23, 1984, that have storage capacities of greater than 75 cubic meters (about 19,800 gallons). Both Tanks T503 and T601 meet the applicable structural and operational requirements for internal floating roofs under Subpart Kb.

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*”. Subpart BBBBBB requires each gasoline storage tank with a capacity of less than 75 m³ (19,812 gallons) to be equipped with a fixed roof. Subpart BBBBBB also has specific structural and operational requirements for external floating roofs and internal floating roofs of tanks subject to the rule. Subpart BBBBBB also limits the VOC/TOC emissions from gasoline loading racks to no greater than 80 mg/l of gasoline loaded, which is the same as the limit in Rule (cc). This facility shall also comply with applicable operating, monitoring, testing, inspection, maintenance, and recordkeeping and reporting requirements under Subpart BBBBBB.

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)*”.

This facility is not subject to 40 CFR Part 60, Subpart XX, “*Standards of Performance for Bulk Gasoline Terminals*”, because the facility’s loading racks were constructed before December 17, 1980, and since then have not had any modification such that could make the loading racks subject to NSPS Subpart XX.

C. Permit Conditions

Conditions 3.2.1 and 3.2.2 were carried over from the current permit No. 5171-089-0085-V-05-0 without change. Both the VRU and VCU are subject the control efficiency standard ($\geq 90\%$) of Rule (cc) and the NSR avoidance mass emission limit (20 mg of VOC per liter of gasoline loaded). This NSR avoidance emission limit is more stringent than that in Rule (cc) and 40 CFR Part 63, Subpart BBBBBB.

Condition 3.2.3 was carried from the current permit without change. The annual ethanol loading limit in this condition allowed a previous ethanol blending project/facility modification to remain minor and avoid NSR review.

Condition 3.2.4 was carried over from the current permit without change. This condition establishes the operating requirements for both VRU and VCU and ensures the compliance with VOC emission standards specified in Conditions 3.2.1 and 3.2.2.

Condition 3.3.1 was carried over from current permit without change. This condition contains applicable structural and operational requirements for Storage Tank T301 under 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.*” Equipped with a floating roof and a vapor recovery system or its equivalent, Tank T301 is in compliance with these requirements.

Condition 3.3.2 was carried over from the current permit without change. This condition contains applicable structural and operational requirements for Storage Tanks T503 and T601 under 40 CFR 60, 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*”. Both Storage Tanks T503 and T601 are constructed and operated in compliance with these requirements.

Except permit reference number update, Conditions 3.3.3, 3.3.4 and 3.3.5 were carried over from the current permit without change. These conditions contain applicable structural and operational requirements for gasoline storage tanks with a capacity of greater than or equal to 75m³ (19,812 gallons) and 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*”. All the storage tanks at this facility except Tank T301 are subject to Subpart BBBBBB, and in compliance with those requirements.

Condition 3.3.6 was carried over from the current permit without change. The condition establishes a general operating requirement under Subpart BBBBBB.

Conditions 3.4.1 thru 3.4.6 were all carryovers from the current permit without change. These conditions contain applicable structural and operational requirements under SIP rules applying to this facility. The facility is in compliance with these requirements.

Both Conditions 3.5.1 and 3.5.2 were carryovers from the current permit without change. Both conditions ensure proper operation of air pollution control system.

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

Conditions 4.2.1, 4.2.2 and 4.2.3 in the current permit were all eliminated because the facility fulfilled the testing and submittal requirements in these conditions in 2017. New condition 4.2.1 contains general testing requirements under 40 CFR Part 63. Permits issued to other gasoline terminals also contain similar condition.

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, 5.2.2 and 5.2.3 were carried over from the current permit without change. These conditions contain specific requirements for monitoring, inspection, data/records generating, and notification under either applicable SIP rules/standards or federal rules/standards.

As the result of reusing “Condition 5.2.4” which was designated as “deleted” in the current permit, Conditions 5.2.5 through 5.2.19 in the current permit were renumbered as Conditions 5.2.4 through 5.2.18 in this draft permit. All the pertinent permit condition number references in these renumbered conditions were also updated accordingly.

These conditions contain specific requirements for monitoring, inspection, data/records generating, and notification under either applicable SIP rules/standards or federal rules/standards.

The existing vapor combustion unit (VCU) is considered a thermal oxidation system other than a flare per 40 CFR 63.11100. Therefore, it is subject to the specific monitoring requirements under Section 63.11092(b)(1)(iii) of 40 CFR Part 63, Subpart BBBBBB, not to CAM rules. Consequently, Current Conditions 5.2.7 and 5.2.8 in Permit No. 5171-089-0085-V-05-0 were replaced by Condition 5.2.6 in this draft permit. Condition 5.2.6 incorporates applicable monitoring requirements for the VCU under 40 CFR Part 63, Subpart BBBBBB. According to the company, the existing VCU at this facility/site has an automated monitoring system with an interlock for the loading rack. This system monitors the flame presence, the blower, the vapor line valve, and the pressure in the vapor line valve continuously. The facility also conducts required semi-annual preventive maintenance inspections. Therefore, the operation of VCU is in compliance with the applicable monitoring requirements under 40 CFR Part 63, Subpart BBBBBB.

The record keeping requirement for ethanol throughput in Condition 5.2.7 (Current Condition 5.2.9) makes a previous NSA/NAA-avoidance facility modification enforceable.

Conditions 5.2.8 thru 5.2.13 (Conditions 5.2.10 thru 5.2.15 in the current permit) contain applicable monitoring and record keeping requirements for loading rack vapor control system and fuel storage tanks.

Since the Permittee already operates the VRU in full capacity and conducted the performance test on the FLRK served by the VRU in 2017, Condition 5.2.14 (Condition 5.2.16 in the current permit) contains a revision to eliminate the timely requirements for installing, calibrating, maintaining, and operating a pressure measurement device on the terminal’s vapor collection system.

The VRU is subject to specific monitoring requirements and equipped with a CEMS under 40 CFR 63, Subpart BBBBBB which was proposed after November 15, 1990. Therefore, the VRU is not subject to CAM requirements.

Condition 5.2.15 (Condition 5.2.17 in the current permit) requires the facility to install, operate, and maintain a breakthrough detector on the VRU and interlock system to prevent gasoline loading operations. This condition has been carried over into this permit.

Condition 5.2.16 (Condition 5.2.18 in the current permit) contains an existing operating requirement for the VRU.

Condition 5.2.17 (Condition 5.2.19 in the current permit) contains one revision, i.e., the VRU shall be equipped with a CEMS to monitor total carbon concentration of its exhaust air stream; and the CEMS shall meet applicable requirements specified in 40 CFR 63.8(a).

C. Compliance Assurance Monitoring (CAM)

Non 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 or semiannual] basis.

B. Specific Record Keeping and Reporting Requirements

As the result of reusing “Condition 6.2.6” which was designated as “deleted” in the current permit, Conditions 6.2.7 through 6.2.18 in the current permit were renumbered in this draft permit as Conditions 6.2.6 through 6.2.17. All the pertinent permit condition references in permit conditions in this permit were also updated accordingly.

Condition 6.2.1 was carried over from the current permit without change. The records of shutdown, malfunction and the subsequent maintenance performed on the vapor control system being used (VRU or VCU) ensure the proper function of the control system and the compliance of the permanent emission limits.

Condition 6.2.2 was carried over from the current permit without change. This condition incorporates the applicable record requirements for Tanks T503 and T601 under 40 CFR Part 60, 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*”.

Condition 6.2.3 was carried over from the current permit without change. This condition incorporates the applicable record requirements for equipment leakage under 40 CFR Part 63, Subpart BBBBBB, “*National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities*”.

Condition 6.2.4 was carried over from the current permit without change. This condition specifies a 45-day repair deadline and, if necessary, allows a 30-day extension of necessary repair for any tank failure detected during inspections required by Conditions 5.2.5 and 5.2.6. This condition also requires the Permittee to notify the Division in writing at least 7 days prior to refilling any tank emptied as a result of required inspection.

Condition 6.2.5 was carried over from the current permit without change. This condition incorporates a monthly leak inspection requirement under 40 CFR Part 63, Subpart BBBBBB for the vapor collection system(s) and loading rack(s) in the process of loading gasoline tank trucks. Each detection of a leak of liquid or vapor gasoline shall be recorded, and the source of the leak repaired within 15 calendar days after it is detected.

Except renumbered, Conditions 6.2.6 and 6.2.7 were carried over from the current permit without change. Condition 6.2.6 requires the Permittee to report each incident of extinguished/lost flame in the VCU when it is in operation, as recorded per Condition 6.2.1. Condition 6.2.7 requires the Permittee to keep up-to-date results of each annual certification test performed on gasoline cargo tanks loading at the facility. Both conditions incorporate applicable requirements under Rule (ss).

Condition 6.2.8 was carried over from the current operating permit without change except renumbered. This condition incorporates record keeping requirements for the inspection of tanks subject to 40 CFR Part 60, Subpart Kb, as specified in Conditions 5.2.4 and 5.2.5.

Except renumbered, Conditions 6.2.9 thru 6.2.15 were all carried over from the current permit without any change. These conditions incorporate applicable record keeping and reporting/notification requirements for storage tanks, loading racks, tank trucks and vapor collection systems subject to 40 CFR Part 63, Subpart BBBBBB. Required records include tank inspection, gasoline tank truck certification and testing, and system malfunction.

Condition 6.2.16 in the current permit was eliminated because the Permittee fulfilled the notification requirement in the condition.

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

Not applicable

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

None

H. Acid Rain Requirements

None

I. Stratospheric Ozone Protection Requirements

None

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.//