

**TITLE V MINOR MODIFICATION (without construction) APPLICATION REVIEW**

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Facility Name: **Delta Air Lines, Inc. - Atlanta Station**

City: Atlanta

County: Clayton and Fulton

AIRS #: 04-13-063-00059

Application #: TV-602281

Date Title V Application Received: September 9, 2022

Permit No: 4512-063-0059-V-04-2

| <b>Program</b>                    | <b>Review Engineers</b> | <b>Review Managers</b> |
|-----------------------------------|-------------------------|------------------------|
| <b>SSPP</b>                       | Dawn Wu                 | Jeng-Hon Su            |
| <b>SSCP</b>                       | Afunya Addo-Osafo       | Tammy Martiny          |
| <b>ISMU</b>                       | Bob Scott               | Dan McCain             |
| <b>TOXICS</b>                     | n/a                     | n/a                    |
| <b>Permitting Program Manager</b> |                         | Stephen Damaske        |

**Introduction**

This narrative is being provided to assist the reader in understanding the content of the referenced SIP permit to construct and draft/proposed operating permit amendment. Complex issues and unusual items are explained in simpler terms and/or greater detail than is sometimes possible in the actual permit. This permit is being issued pursuant to: (1) Sections 391-3-1-.03(1) and 391-3-1-.03(10) of the Georgia Rules for Air Quality Control, (2) Part 70 of Chapter I of Title 40 of the Code of Federal Regulations, and (3) Title V of the Clean Air Act Amendments of 1990. The following narrative is designed to accompany the proposed permit and is presented in the same general order as the permit. This narrative is intended only as an adjunct for the reviewer and has no legal standing. Any revisions made to the permit in response to comments received during the EPA review process will be described in an addendum to this narrative.

**I. Facility Description****A. Existing Permits**

Table 1 below lists the current Title V permit, and all administrative amendments, minor and significant modifications to that permit, and 502(b)(10) attachments.

Table 1: Current Title V Permit and Amendments

| Permit/Amendment Number | Date of Issuance | Description                              |
|-------------------------|------------------|--|
| 4512-063-0059-V-04-0    | March 24, 2020   | Title V renewal                          |
| 4512-063-0059-V-04-1    | June 15, 2020    | Incorporate four (4) off-permit changes. |

**B. Regulatory Status****1. PSD/NSR/RACT**

Delta's Atlanta operations are considered two sites with regard to the PSD/NSR program.

The first PSD/NSR site consists of all Delta operations (SIC Code 4512), except the Worldspan operation. The second PSD/NSR site is the Worldspan operation, which was separated based on a different SIC Code (SIC Code 7370). The Worldspan operation was sold in 2004, but Delta continues to own the land, building, and emergency generators associated with Worldspan operations. The post-sale SIC Code for the Worldspan PSD/NSR site is 7374 (Service – Computer Processing & Data Preparation), which indicates that the Worldspan building should remain a separate PSD/NSR site. The Worldspan emergency generators are included in the Delta Air Lines – General Office Facilities Title V Permit.

The Worldspan site is a major source under NSR regulations:

- The NOx Potential Emissions are greater than 25 tons/yr.

The General Office Facilities/Technical Operations Center/Atlanta Station (hereinafter “facility”) site is a major source under NSR regulations because:

- The VOC Potential Emissions are greater than 100 tons/yr.
- The NOx Potential Emissions are greater than 100 tons/yr.
- The SO2 Potential Emissions are greater than 250 tons/yr.
- The CO Potential Emissions are greater than 250 tons/yr.

## 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        | ✓                         | ✓  |                                   |                         |

**II. Proposed Modification**

## A. Description of Modification

Delta Air Lines, Inc. - Atlanta Station (hereinafter "facility") submitted a Title V minor amendment without construction application, No. 602281 for the following:

- To incorporate the three cold cleaners that were previously permitted in two off-permit changes (OPCs).
- To remove equipment from the GSE shop that was decommissioned in the fourth quarter of 2020.
- To remove equipment that is now operated by FSM Group – Atlanta and included in their permit, No. 8744-063-0152-E-01-0 (issued on February 21, 2022). The fuel farm and fueling equipment managed and controlled by FSM are still owned by Delta Air Lines, Inc. Therefore, the Division has determined that FSM Group – Atlanta and the three Delta entities (Atlanta Station, General Office Facilities, and Technical Operations Center) are considered as one single site under Title V but are permitted separately.

## B. Emissions Change

There will be an overall decrease in emissions because of this modification. However, no emissions credit will be taken for this modification.

**Table 3: Emissions Change Due to Modification**

| <b>Pollutant</b>  | <b>Is the Pollutant Emitted?</b> | <b>Net Actual Emissions Increase (Decrease) (tpy)</b> | <b>Net Potential Emissions Increase (Decrease) (tpy)</b> |
|-------------------|----------------------------------|---|--|
| PM                | ✓                                | 0   | 0  |
| PM <sub>10</sub>  | ✓                                | 0   | 0  |
| PM <sub>2.5</sub> | ✓                                | 0   | 0  |
| SO <sub>2</sub>   | ✓                                | 0   | 0  |
| VOC               | ✓                                | 0   | 0  |
| NO <sub>x</sub>   | ✓                                | 0   | 0  |
| CO                | ✓                                | 0   | 0  |
| TRS               |                                  |   |  |
| H <sub>2</sub> S  |                                  |   |  |
| Individual HAP    | ✓                                | 0   | 0  |
| Total HAPs        | ✓                                | 0   | 0  |

**C. PSD/NSR Applicability**

This modification is not subject to PSD or NSR and is not a modification under NSPS or NESHAP.

### III. Regulated Equipment Requirements

#### A. Brief Process Description

Delta Air Lines, Inc. - Atlanta Station performs general airport operations. Specific activities conducted at the Atlanta Station facility include, but are not limited to, ~~fuel storage and distribution~~, deicing, ground support equipment maintenance, facilities maintenance, and terminal operations including boilers and emergency power generators.

#### B. Equipment List for the Process

| REGULATORY GROUPS     |   |  |                               |                             |
|-----------------------|---|--|-------------------------------|-----------------------------|
| Emission Units/Groups |   | Specific Limitations/Requirements  | Air Pollution Control Devices |                             |
| ID No.                | Description                                     | Applicable Requirements/Standards  | ID No.                        | Description                 |
| BF41                  | Boilers Constructed On or After January 1, 1972 | GA Rule 391-3-1-.02(2)(d)<br>GA Rule 391-3-1-.02(2)(g)<br>GA Rule 391-3-1-.02(2)(rrr)<br>40 CFR 63 Subpart DDDDD | NA                            | NA                          |
| BF42                  | Process Heaters                                 | 391-3-1-.02(b)<br>391-3-1-.02(g)<br>391-3-1-.02(yy)  | N/A                           | N/A                         |
| ET41                  | Automotive Engine Test Cells                    | GA Rule 391-3-1-.02(2)(b)<br>GA Rule 391-3-1-.02(2)(g)<br>GA Rule 391-3-1-.02(2)(yy)                             | NA                            | NA                          |
| PG41                  | Non-Aerospace Spray Gun Cleaners                | GA Rule 391-3-1-.02(2)(tt)   | NA                            | NA                          |
| PT41                  | Non-Aerospace Spray Booths                      | GA Rule 391-3-1-.02(2)(b)<br>GA Rule 391-3-1-.02(2)(e)<br>GA Rule 391-3-1-.02(2)(tt)                             | PF04                          | Filter                      |
| <del>REM1</del>       | <del>Site Remediation Activities</del>          | <del>40 CFR 63, Subpart GGGGG</del>  | <del>NA</del>                 | <del>NA</del>               |
| SC43                  | Non-Aerospace Cold Cleaners                     | GA Rule 391-3-1-.02(2)(ff)   | NA                            | NA                          |
| ST42                  | Volatile Organic Liquid Storage Tanks           | GA Rule 391-3-1-.02(2)(vv)   | NA                            | NA                          |
| <del>ST43</del>       | <del>Large Gasoline Service Stations</del>      | <del>GA Rule 391-3-1-.02(2)(bb)<br/>GA Rule 391-3-1-.02(2)(rr)</del>   | <del>NA</del>                 | <del>Stage I Controls</del> |
| <del>ST44</del>       | <del>Small Gasoline Service Station</del>       | <del>GA Rule 391-3-1-.02(2)(rr)</del>  | <del>NA</del>                 | <del>Stage I Controls</del> |

| NSR AVOIDANCE GROUPS  |  |                                   |                               |              |
|-----------------------|--|-----------------------------------|-------------------------------|--------------|
| Emission Units/Groups |  | Specific Limitations/Requirements | Air Pollution Control Devices |              |
| ID No.                | Description  | Applicable Requirements/Standards | ID No.                        | Description  |
| NSR4                  | Ground Support Equipment Surface Coating (pka PT41 and PG41) | NAA-NSR Avoidance                 | NA                            | None for VOC |

\* 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.

\* See Attachment D for a detailed listing of individual emission units in each Equipment Group

#### C. Equipment & Rule Applicability

- Emission and Operating Caps

None

- Applicable Rules and Regulations -

The facility is no longer subject to 40 CFR 63, Subpart GGGGG since emission unit REM1 has been removed.

The facility is no longer subject to GA Rule 391-3-1-.02(2)(bb) since emission unit ST43 has been transferred to FSM Group.

The facility is no longer subject to GA Rule 391-3-1-.02(2)(rr) since emission units ST43 and ST44 have been transferred to FSM Group.

**D. Permit Conditions**

Condition 3.3.1 has been deleted since emission unit REM1 has been removed.

Condition 3.4.5 has been deleted since emission unit ST43 has been transferred to FSM Group.

Conditions 3.4.7 and 3.4.8 have been deleted since emission units ST43 and ST44 have been transferred to FSM Group.

**IV. Testing Requirements** (with Associated Record Keeping and Reporting)

Conditions 4.2.1 through 4.2.3 have been deleted since emission units ST43 and ST44 have been transferred to FSM Group.

**V. Other Record Keeping and Reporting Requirements**

Condition 6.1.7d.ii. has been deleted since emission units ST43 and ST44 have been transferred to FSM Group.

Condition 6.1.7d.v. has been deleted since emission unit REM1 has been removed.

Condition 6.2.6 has been deleted since emission unit REM1 has been removed.

Condition 6.2.8 has been deleted since emission units ST43 and ST44 have been transferred to FSM Group.

**Addendum to Narrative**

The 45-day EPA 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.//