

Facility Name: **Yates Steam-Electric Generating Plant**  
City: Newnan  
County: Coweta  
AIRS #: 04-13-077-00001

Application #: TV-23087  
Date Application Received: January 27, 2015  
Permit No: 4911-077-0001-V-04-0

Program	Review Engineers	Review Managers
<b>SSPP</b>	Steve Allison	James Eason
<b>ISMU</b>		Dan McCain
<b>SSCP</b>	Pierre Sannon	Tammy Martiny
<b>Toxics</b>	Do Hyong Kim	Michael Odom
<b>Permitting Program Manager</b>		Eric Cornwell

## Introduction

This narrative is being provided to assist the reader in understanding the content of the attached draft Part 70 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. This 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 primary purpose of this permit is to consolidate and identify existing state and federal air requirements applicable to **Yates Steam-Electric Generating Plant** and to provide practical methods for determining compliance with these requirements. The following narrative is designed to accompany the draft permit and is presented in the same general order as the permit. It initially describes the facility receiving the permit, the applicable requirements and their significance, and the methods for determining compliance with those applicable requirements. This 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:**

Yates Steam-Electric Generating Plant

**2. Parent/Holding Company Name**

The Southern Company  
Georgia Power Company

**3. Previous and/or Other Name(s)**

This facility is commonly known and referred to as Plant Yates. No other names were identified.

**4. Facility Location**

708 Dyer Road  
Newnan, Coweta County, Georgia

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

Coweta County is included as part of the 15-county 2008 8-hour moderate Atlanta ozone nonattainment area.

Coweta was previously a part of the 13-county 1990 1-hour Atlanta ozone nonattainment area. The Atlanta area was redesignated as attainment for the 1-hour standard on June 15, 2005. Coweta was also part of the 20-county 1997 8-hour ozone Atlanta nonattainment area that was redesignated as attainment on December 2, 2013.

Coweta was part of the 1997 annual PM<sub>2.5</sub> Atlanta nonattainment area designation on January 5, 2005. However, that area was redesignated as attainment on February 24, 2016.

The area is in attainment and/or unclassifiable for all other NAAQS.

## B. Site Determination

In the past, Plant Yates contracted with an ash processing facility located on site to process and sell some of the coal ash produced from the electric generating process at Plant Yates. Even though the ash processing facility and Plant Yates were located on contiguous property, they were deemed to be separate sources for purposes of Title V permitting due to the fact that there was no common control between Georgia Power Company and the ash processing facility. Therefore, the Title V permit for Plant Yates covers only those operations controlled solely by Georgia Power. The ash processing facility, which was itself a minor source under 40 CFR Part 70, operated under its minor source SIP permit. With the removal of coal burning capability from Plant Yates, the ash processing facility will no longer be in operation.

## C. Existing Permits

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
4911-077-0001-V-03-0	July 27, 2010	Title V Renewal Permit.
4911-077-0001-V-03-1	November 21, 2011	Incorporation of the Georgia Rule 391-3-1-.02(2)(sss) monitoring requirements into the permit for Units SG01, SG06, and SG07 and to correct a typographical error in Permit Condition 6.1.7a.
4911-077-0001-V-03-2	March 2, 2012	Template Conditions 6.1.3, 6.1.4 and 8.14.1 were updated in September 2011 to allow up to 60 days to submit periodic reports. Alternative reporting deadlines are allowed per 40 CFR 70.6, 40 CFR 60.19(f) and 40 CFR 63.10(a). Revision of the periodic reporting deadlines in Conditions 6.2.11 and 6.2.13.
4911-077-0001-V-03-3	March 1, 2013	Update the Title IV Acid Rain Program Phase II NO <sub>x</sub> Averaging Plan for years 2013 to 2017 for Emission Units SG01, SG02, SG03, SG04, SG05, SG06 and SG07 in Condition 7.9.7.
4911-077-0001-V-03-4	revoked	
4911-077-0001-V-03-5	August 29, 2014	The conversion of Units 6 and 7 from coal to natural gas.
4911-077-0001-V-03-6	November 26, 2014	Renewal of acid rain permit.
4911-077-0001-V-03-7	April 20, 2016	Update the Title IV Acid Rain Program Phase II NO <sub>x</sub> Averaging Plan for years 2015 to 2016 for Emission Units SG06 and SG07 in Condition 7.9.7.

## D. Process Description

### 1. SIC Codes(s)

4911

### 2. Description of Product(s)

Yates Steam-Electric Generating Plant generates electricity for sale.

### 3. Overall Facility Process Description

Plant Yates burns fossil fuel to generate electricity. This facility includes two steam electric generating units that exclusively burn natural gas. Unit 6 and Unit 7 each power their own steam turbine rated at 350 megawatts and exhaust through separate stack liners in the 805 ft stack.

### 4. Overall Process Flow Diagram

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

## E. Regulatory Status

### 1. PSD/NSR

This facility is a major source under PSD because it has potential emissions of PM, NO<sub>x</sub>, VOC, and CO greater than 100 tpy (it is one of the 28 named source categories under PSD). The facility was originally constructed before the PSD regulations were effective. Due to new permit condition 3.2.1, potential SO<sub>2</sub> emissions 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	N/A			✓
H <sub>2</sub> S	N/A			✓
Individual HAP	✓	✓		
Total HAPs	✓	✓		

### 3. MACT Standards

Plant Yates contains equipment that is subject to 40 CFR 63 Subpart DDDDD, National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters. The boilers are specifically exempt from the standard since they exclusively burn natural gas. However, the Water Bath Heater (Emission Unit ID: WBH1) is not exempt and is therefore subject to the rule.

### 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	No
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

None applicable.

#### C. Compliance Status

No non-compliance mentioned in Application 18929 for the facility.

#### D. Operational Flexibility

None applicable.

#### E. Permit Conditions

None applicable.

### III. Regulated Equipment Requirements

#### A. Brief Process Description

Plant Yates burns fossil fuel to generate electricity. This facility includes two steam electric generating units which exclusively burn natural gas. Unit 6 and Unit 7 each power their own steam turbine rated at 350 megawatts and exhaust through separate stack liners in the 805 ft stack. To support the electric generating units, the facility also utilizes a 9 MMBtu/hr water bath heater (Emission Unit ID: WBH1) that fires natural gas only.

In August of 2014, the facility's permit was modified to change Unit 6 and Unit 7 to fire natural gas only. Additionally, Units 1-5 were scheduled for decommissioning. With this modification, Plant Yates will no longer combust coal or fuel oil to generate power.

With the conversion to natural gas, the facility also installed a catalytic oxidizer on Units 6 and 7 to control VOC emissions from the combustion of natural gas.

#### B. Equipment List for the Process

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
SG06	Steam Generator Unit 6 (3,559 MMBtu/hr) (Natural Gas Fired)	391-3-1-.02(2)(b), (d), (g), (yy), (jjj), (sss), Acid Rain, 40 CFR 96	3.2.1, 3.2.2, 3.2.3, 3.4.1, 3.4.2, 3.4.3, 3.4.5, 3.4.6, 4.1.3, 5.2.1, 5.2.2, 5.2.3, 5.2.8, 6.1.7, 6.2.1, 6.2.3, 6.2.4, 6.2.10, 6.2.10, 6.2.12, 7.9.7	OC06	Oxidation catalyst
SG07	Steam Generator Unit 7 (3,559 MMBtu/hr) (Natural Gas Fired)	391-3-1-.02(2)(b), (d), (g), (yy), (jjj), (sss), Acid Rain, 40 CFR 96	3.2.1, 3.2.2, 3.2.3, 3.4.1, 3.4.2, 3.4.4, 3.4.5, 3.4.6, 4.1.3, 5.2.1, 5.2.2, 5.2.3, 5.2.8, 6.1.7, 6.2.1, 6.2.3, 6.2.4, 6.2.10, 6.2.12, 7.9.7	OC07	Oxidation catalyst
WBH1	Water Bath Heater Unit 1 (9 MMBtu/hr) (Natural Gas Fired)	391-3-1-.02(2)(d), (g), (rrr), 40 CFR 63 Subpart DDDDD	3.2.3, 3.3.1, 3.3.2, 3.4.7, 3.4.8, 3.4.9, 4.1.3, 5.2.4, 5.2.5, 5.2.7, 6.1.7, 6.2.11, 6.2.13, 6.2.14, 6.2.15	None	N/A

\* Generally applicable requirements contained in this permit may also apply to emission units listed above.

## C. Equipment &amp; Rule Applicability

## Emission and Operating Caps:

The electric generating units (Emission Unit IDs: SG06 and SG07) and the water bath heater are limited by Condition 3.2.3 to 121.5 tons of VOC per consecutive 12 month period. This emission limit was implemented in amendment 4911-077-0001-V-03-5 issued August 29, 2014 for the purpose of avoiding nonattainment NSR permitting.

Condition 3.2.1 limits the fuel fired in the electric generating units to natural gas only. This limits the PTE of SO<sub>2</sub> for SG06 and SG07 to 20 tpy using AP-42 emission factors as follows:

AP 42, Fifth Edition, Volume I Chapter 1: External Combustion Sources, Section 1.4 Natural Gas Combustion, Table 1.4-2 lists an SO<sub>2</sub> emission factor of 0.6 lb per MMscf.

$$SO_2 \text{ emissions per EGU} = \left( \frac{3,489,216 \text{ scf}}{\text{hr}} \right) \left( \frac{8760 \text{ hr}}{\text{yr}} \right) \left( \frac{1 \text{ MMSCF}}{10^6 \text{ scf}} \right) \left( \frac{0.6 \text{ lb}}{\text{MMscf}} \right) \left( \frac{\text{ton}}{2,000 \text{ lb}} \right)$$

$$SO_2 \text{ emissions per EGU} = 9.17 \text{ tons per year}$$

$$SO_2 \text{ emissions from SG06 and SG07} = 18.34 \text{ tons per year}$$

## Rules and Regulations Assessment:

Georgia Rule 391-3-1-.02(2)(b) – “Visible Emissions”

Rule (b) limits the opacity of visible emissions from any air contaminant source that is subject to some other emission limitation under 391-3-1-.02(2) unless the source is subject to another opacity standard in 391-3-1-.02. Under Rule (b), the opacity of visible emissions from regulated sources may not exceed 40 percent under this general visible emission standard. The emission units are subject to Georgia Rule 391-3-1-.02(2)(b).

Georgia Rule 391-3-1-.02 (2)(d) – “Fuel Burning Equipment”

Rule (d) limits emission of particulate matter from sources that meet the definition of “fuel-burning equipment”. The electric generating units (Emission Unit IDs: SG06 and SG07) are subject to Georgia Rule 391-3-1-.02(2) (d)1(iii) because they were under construction before January 1, 1972 and have a heat input capacity greater than 2,000 million Btu per hour.

Georgia Rule 391-3-1-.02 (2)(g) – “Sulfur Dioxide”

Georgia Rule (g) applies to all “fuel burning” sources. This rule limits the sulfur content of fuel burned in all fuel burning sources. The only fuel that will be burned in the electric generating units and process water heater at this facility is natural gas which inherently has a low sulfur content.

*Georgia Rule 391-3-1-.02 (2)(yy) – “Emissions of Nitrogen Oxides from Major Sources”*

Rule (yy) regulates the emissions of NO<sub>x</sub> from facilities in the metro Atlanta nonattainment area. The rule requires facilities subject to the rule to demonstrate Division approved Reasonably Achievable Control Technology (RACT) to control NO<sub>x</sub> emissions. Since Plant Yates is in Coweta County and emits more than the de minimums amount of NO<sub>x</sub>, Rule (yy) applies. Per Georgia Rule 391-3-1-.02 (2)(yy)5., the facility will comply with Georgia Rule (yy) by complying with rule (jjj).

*Georgia Rule 391-3-1-.02 (2)(jjj) – “NO<sub>x</sub> Emissions from Electric Utility Steam Generating Units.”*

Units SG06 and SG07 are currently subject to Georgia Rule (jjj), however upon the completion of the conversion to natural gas of Units 6 and 7, the units will no longer be subject to Georgia Rule (jjj). Units SG06 and SG07 will be subject to Georgia Rule (yy), however Georgia Power has agreed to continue to comply with the requirements of Georgia Rule (jjj) to satisfy the requirements of Georgia Rule (yy).

*Georgia Rule 391-3-1-.02 (2)(rrr) – “NO<sub>x</sub> Emissions from Small Fuel-Burning Equipment.”*

As a companion to rule (yy), Georgia Rule (rrr) regulates the emissions of NO<sub>x</sub> from small fuel burning units in the metro Atlanta nonattainment area. Rule (rrr) requires the small fuel burning equipment to be fired only with natural gas, propane, or LPG, and it requires a tune-up of equipment annually. Since the Water Bath Heater (Emission Unit ID: WBH1) is less than 10 MMBtu and meets the applicability requirements, rule (rrr) applies.

*Georgia Rule 391-3-1-.02 (2)(sss) – “Multipollutant Control for Electric Utility Steam Generating Units.”*

Georgia Rule (sss) applies to SG06 and SG07 because these units are specifically cited in the rule. However, the rule also states that the requirement to operate selective catalytic reduction (SCR) and flue gas desulfurization (FGD) controls does not apply when the units are operated as a natural gas-fired electric utility steam generating unit. Since the units have been converted to fire natural gas exclusively, the requirements of Georgia Rule (sss) do not apply.

*Georgia Rule 391-3-1-.02 (2)(uuu) – “SO<sub>2</sub> Emissions from Electric Utility Steam Generating Units.”*

Units SG06 and SG07 were previously subject to Georgia Rule (uuu) when units SG06 and SG07 fired coal for fuel. With the conversion of the units to fire natural gas exclusively, the units are now only operated as natural gas-fired electric utility steam generating units and are therefore exempt per Georgia Rule 391-3-1-.02(2)(uuu)5(ii).



*Prevention of Significant Deterioration (PSD):*

Emissions of NO<sub>x</sub>, CO, VOC, SO<sub>2</sub>, PM/PM<sub>10</sub> and opacity are subject to the requirements of 40 CFR 52.21. This regulation is applicable because potential emissions of one or more of the applicable air pollutants equal or exceed 100 tons per year. (Note: Plant Yates is one of the listed 28 source categories under the PSD.) This facility predates PSD regulations. Therefore, it has never been required to go through PSD review, but any modification to the facility must be evaluated as a PSD modification.

*40 CFR 63 Subpart DDDDD – National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters*

Subpart DDDDD (Boiler MACT) regulates emissions from boilers located at a major source of HAP emissions. The Boiler MACT provides an exemption for electric generating units that burn natural gas as 85% or greater of their total heat input. Units 6 and 7 combust natural gas exclusively and are therefore exempt from the Boiler MACT. The process water heater that supports the boilers is not covered under the exemption and is subject to the MACT standard.

*40 CFR 63 Subpart UUUUU – National Emission Standards for Hazardous Air Pollutants: Coal- and Oil-Fired Electric Utility Steam Generating Units*

Subpart UUUUU regulates emissions from electric utility boilers where coal or oil is used to fire the boilers. Units SG06 and SG07 previously fired coal and Subpart UUUUU applied. Both electric generating units have been converted to burn natural gas exclusively. With that conversion, Subpart UUUUU no longer applies.

D. Compliance Status

No non-compliant equipment is listed in Application 23807.

E. Operational Flexibility

The permit includes the standard conditions allowing section 502(b)(10) changes and off-permit changes. Additional operational flexibility provisions do not need to be incorporated into this Title V permit as the permit already provides sufficient flexibility for the facility. The applicant did not include any alternate operating scenarios in their Title V application.

## F. Permit Conditions

Permit Condition Number	Explanation
3.2.1	This condition codifies the requirement to only burn natural gas. The burning of natural gas allows the avoidance of several regulations. Particularly, this limit reduces SO <sub>2</sub> emissions to well below 2,000 tons per year and avoids the requirements of the SO <sub>2</sub> Data Requirements Rule (40 CFR 51.1200)
3.2.2	This condition defines the NO <sub>x</sub> emission limit for the 7-plant plan, on a combined basis, for the ozone season per rule 391-3-1-.03(8)(c)15.
3.2.3	This condition contains the NAA-NSR avoidance limits for VOC for the facility.
3.3.1	This condition states the general applicability of the Boiler MACT for the Water Bath Heater WBH1 as it is the only emission unit that is subject to the Boiler MACT.
3.3.2	This condition has the Boiler MACT work practice standards for the Water Bath Heater WBH1.
3.4.1	This condition contains the state rule (d) particulate matter limit for the boilers.
3.4.2	This condition contains the state rule (b) opacity limit for the boilers.
3.4.3	This condition limits NO <sub>x</sub> emissions per rule (yy) for Emission Unit SG06.
3.4.4	This condition limits NO <sub>x</sub> emissions per rule (yy) for Emission Unit SG07.
3.4.5	This condition allows the facility to comply with the 5-plant NO <sub>x</sub> plan as an alternative for compliance with conditions 3.4.3 and 3.4.4.
3.4.6	This condition allows the facility to comply with the 7-plant NO <sub>x</sub> plan as an alternative for compliance with conditions 3.4.3 and 3.4.4.
3.4.7	This condition contains the rule (d) opacity requirements for the water bath heater. Because the rule (b) requirements are less stringent, rule (b) is subsumed.
3.4.8	This condition contains the rule (d) particulate matter requirements for the water bath heater.
3.4.9	This condition contains the rule (g) requirements for the water bath heater.

**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****1. Individual Equipment**

None applicable.

**2. Equipment Groups (all subject to the same test requirements):**

None applicable.

## 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

#### 1. Individual Equipment:

The Plant Yates steam generating units (emission unit IDs SG06 and SG07) are fossil fuel fired boilers subject to Georgia Rules 391-2-1-.02(2)(b), (d), (g), and (yy), (jjj), and (sss) for visible emissions (opacity), particulate matter, sulfur dioxide, and nitrogen oxides.

The permit requires monitoring of the catalyst used for VOC control. Condition 5.2.2 requires the catalyst inlet temperature be monitored and recorded, and Condition 5.2.8 requires the catalyst be tested for effectiveness every 16,000 hours of operation.

A continuous opacity monitoring system (COMS) is no longer required by Rule 391-3-1-.02(6)(a)2(i) for the EGUs since the EGUs burn gaseous fuel only.

The permit requires the use the NO<sub>x</sub> CEMS and the procedures in Conditions 5.3.4, 5.3.5, and 5.3.6 to assure compliance with the NO<sub>x</sub> limits from Rules (yy) and (jjj).

Due to the nature of the combustion of natural gas, the likelihood of violation is minimal. Therefore, no additional monitoring is required.

#### 2. Equipment Groups (all subject to the same monitoring requirements):

None applicable.

### C. Compliance Assurance Monitoring (CAM)

The facility has implemented catalytic oxidizers for the control of CO. The facility does not have an annual limit on CO emissions. The oxidizers additionally control VOC emissions which are limited by the permit. However, the facility does not need the catalytic oxidizers to maintain compliance with the VOC limit. Therefore, with EPA concurrence, the Division has concluded that CAM does not apply.

## **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 basis.

Template Conditions 6.1.3 and 6.1.4 were updated in September 2011 to allow ~60 days to submit periodic reports. Alternative reporting deadlines are allowed per 40 CFR 70.6, 40 CFR 60.19(f) and 40 CFR 63.10(a).

### **B. Specific Record Keeping and Reporting Requirements**

The permittee is required by this permit to maintain fuel records for several purposes. Condition 6.2.1 is a general fuel recordkeeping requirement to ensure only natural gas is combusted at the facility and verifies quantities burned. Condition 6.2.2 requires the permittee to maintain records of fuel oil purchased at the facility. While the electric generating units no longer burn fuel oil, this condition remains to ensure sulfur standards are maintained when fuel oil is used elsewhere at the facility.

As discussed previously, the permittee is required to install and operate a NO<sub>x</sub> CEMS on the electric generating units. Records from the CEMS are maintained and used in Conditions 6.2.3 and 6.2.4 to demonstrate compliance with the 7-plant plan. Additionally, Condition 6.2.5 utilizes NO<sub>x</sub> CEMS data to show compliance with rule (jjj).

Conditions 6.2.10 through 6.2.12 require the permittee to calculate the 12-month rolling total of VOC emissions from the electric generating units and the water bath heater. The total is used to demonstrate compliance with the plant's VOC limits established in NAA/NSR avoidance Condition 3.2.3. This limit was established in the 4911-077-0001-V-03-5 amendment to the permit.

The recordkeeping and reporting requirements for the Water Bath Heater, as required by 63 CFR Subpart DDDDD, are contained in Conditions 6.2.14 through 6.2.16. These conditions require the permittee to maintain records of the tune-ups required in the permit and the operating hours of the unit. Additionally, the permittee must submit that information to the Division biennially.

## VII. Specific Requirements

### A. Operational Flexibility

Other than the standard conditions (7.1.1, 7.2.1, and 7.2.2), operational flexibility provisions have not been incorporated into this Title V Permit. The applicant did not include any alternative operating scenarios in their Title V Application or request any specific operational flexibility conditions.

### B. Alternative Requirements

There are no alternative requirements that need to be incorporated into the Title V Permit.

### C. Insignificant Activities

Refer to <http://gatv.georgiaair.org/GATV/default.asp> for the Online Title V Application.

Refer to the following forms in the Title V permit application:

- Form D.1 (Insignificant Activities Checklist)
- Form D.2 (Generic Emissions Groups)
- Form D.3 (Generic Fuel Burning Equipment)
- Form D.6 (Insignificant Activities Based on Emission Levels of the Title V permit application)

### D. Temporary Sources

Plant Yates has not requested to operate any temporary sources.

### E. Short-Term Activities

Yates Steam-Electric Generating Plant stated that they have the following short-term activities; sand blasting for maintenance purposes and asbestos removal in accordance with Georgia Rule 391-3-1-.02(9)(b)7. See Form D.5 of the Title V application for a more complete description.

Other than asbestos removal, which is subject to Georgia Rule 391-3-1-.02(9)(b)7, these operations are not subject to any state or federal air quality requirements other than the general provisions of the Georgia Rules for Air Quality Control. The general provisions and the requirement to keep records of the frequency and duration of these activities have been included in Section 7.6 of the permit.

### F. Compliance Schedule/Progress Reports

The facility is in compliance with all Air Quality Regulations. Therefore, no compliance schedule or progress reports are necessary.

### G. Emissions Trading

This facility is not involved in any emission trading programs besides being part of the Acid Rain Program. This facility is currently operating under a federally enforceable emissions cap. Nothing in this permit shall prohibit this facility from participation in an emissions trading or economic incentives program provided that the permit is amended to include permit terms that ensure that the emissions trades are quantifiable and enforceable.

### H. Acid Rain Requirements

This facility is subject to requirements in Title IV of the Clean Air Act. They are subject to 40 CFR 72 (permits), 73 (sulfur dioxide), 75 (monitoring), and 76 (nitrogen oxides).

Plant Yates was issued a Phase I Acid Rain Permit by US EPA. This permit will expire on December 31, 1999. The Phase II Acid Rain Permit emission limits will take effect on January 1, 2000. US EPA has determined that Phase I Acid Rain requirements do not need to be incorporated into the Title V Permit (see US EPA memo from Brian J. McLean, Director of the Acid Rain Division, dated March 15, 1994). This memo states, "States are not required to reference a Phase I permit in a Title V permit." The memo goes on to say, "A Phase I permit, however, is EPA-issued and its requirements are only enforceable by EPA and citizens under the Act."

Plant Yates submitted their Phase II Permit Application, No. 8233, dated December 18, 1995 to satisfy the requirements of 40 CFR 72.30(b)(2). The Phase II Acid Rain Permit was issued November 21, 1997 as Air Quality Permit No. 4911-077-0001-E-01-0. This permit, however, did not include the NOx requirements in 40 CFR part 76. US EPA was late promulgating the Phase II NOx requirements. As a result, affected sources were not required to submit their NOx compliance plans until January 1, 1998, which was after states were required to have issued the Phase II permits for SO2 (December 31, 1997).

Plant Yates submitted their Phase II NOx Compliance Plan (and NOx Averaging Plan), Application No. 10431, dated December 3, 1997 to satisfy the requirements of 40 CFR 76.9(b)(2). The NOx Averaging Plan was amended and is dated July 20, 1998.

At this time, all Phase II Acid Rain requirements are being incorporated into this Title V Permit. 40 CFR 72.50(a)(1) allows a complete Phase II Permit Application to be attached to the Title V Permit as part of the Permit. Yates Steam-Electric Generating Plant's Phase II Permit Application, as well as the Phase II NOx Compliance Plan and the Phase II NOx Averaging Plan, is attached to the Title V Permit as part of the Permit to ensure that all Acid Rain applicable requirements are incorporated into the Title V Permit.

**Specific SO<sub>2</sub> Requirements (40 CFR 73):**

In Table 2 of 40 CFR 73, EPA allocated the following number of SO<sub>2</sub> allowances to Units 6 and 7.

	Total Annual Phase II Allowance for 2010 and Beyond
SG06	10,696
SG07	10,521

The number of allowances actually held by an affected source in a unit account may differ from the number allocated by EPA. Neither of these conditions require a revision to the unit SO<sub>2</sub> allowance allocations identified in the Title IV Permit (see 40 CFR 72.84).

**Specific Monitoring Requirements (40 CFR 75):**

The facility is required, under 40 CFR 75, to monitor certain pollutants and parameters, including NO<sub>x</sub> emissions, SO<sub>2</sub> emissions, CO<sub>2</sub> emissions, flowrate, and heat input. These pollutants and parameters are reported directly to EPA, electronically, on a quarterly basis.

**Specific NO<sub>x</sub> Requirements (40 CFR 76):**

Plant Yates Units 6 and 7 are part of a Phase II NO<sub>x</sub> averaging plan submitted by Georgia Power Company in accordance with 40 CFR 76.11. Georgia Power has elected to comply with 40 CFR Part 76 by complying with the Phase II NO<sub>x</sub> averaging plan, in lieu of the standard limits. The plan is attached as part of the Title V permit. It is worth noting that this averaging plan includes units located outside the State of Georgia

**I. Stratospheric Ozone Protection Requirements**

The standard permit condition pursuant to 40 CFR 82 Subpart F has been included in the Title V Permit. These Title VI requirements apply to all air conditioning and refrigeration units containing ozone-depleting substances regardless of the size of the unit or of the source. Since Yates Steam-Electric Generating Plant has at least some air conditioners, chillers and refrigerators Subpart F is an applicable requirement.

Yates Steam-Electric Generating Plant does not service motor vehicles, so 40 CFR 82 Subpart B is not applicable.

**J. Pollution Prevention**

There are no pollution prevention provisions incorporated into this Title V Permit.

**K. Specific Conditions**

None Applicable.



L. Clean Air Interstate Rule (CAIR) Requirements

CAIR was replaced by the Cross State Air Pollution Rule (CSAPR) as of January 1, 2015. Condition 7.15.2 which required the facility to comply with the CAIR facility-wide annual NO<sub>x</sub> allocations has been deleted.

**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 December 1, 2016 and ended on January 3, 2017. Comments were received by the Division. The comments received from Georgia Power and the Division's responses to those comments are summarized below.

*Georgia Power Comment 1***Condition 6.2.14**

Georgia Power requests that Condition 6.2.14.d. be removed to accurately convey EPA's November 2015 Reconsideration to the Industrial Boiler MACT rule [40 CFR 63.7550(c)(1)].

According to 40 CFR 63.7550(c)(1), "If the facility is subject to the requirements of a tune up you must submit a compliance report with the information in paragraphs (c)(5)(i) through (iii) of this section, (xiv) and (xvii) of this section, and paragraph (c)(5)(iv) of this section for limited-use boiler or process heater."

The water bath heater (WBH1) at Plant Yates is not a limited use unit; therefore, Plant Yates should not be required to report the total operating time during the reporting period as stated in 40 CFR 63.7550(c)(5)(iv).

A proposed revision to the condition is as follows:

- 6.2.14 Every 2 years, beginning January 31, 2017, the Permittee shall prepare and submit to the Division by January 31, a compliance report covering the 2-year period, January 1-December 31, since the previous reporting period, containing the information specified below for WBH1. The first reporting period shall cover from February 26, 2015 to December 31, 2016 and shall be submitted by January 31, 2017.  
[40 CFR 63.7550(b) and (c)(1)]*
- a. Company and Facility name and address.*
  - b. Process unit information*
  - c. Date of report and beginning and end dates of the reporting period*
  - d. ~~The total operating time during the reporting period.~~*
  - e. The date of the most recent tune-up for each unit, including the date of the most recent burner inspection if delayed from the 2-year schedule.*
  - f. A statement by a responsible official with official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.*

*Division Response to Georgia Power Comment 1*

The Division agrees with the requested changes will revise Condition 6.2.14 as stated.