Facility Name: **Transcontinental Gas Pipe Line Company, LLC – Compressor Station 120**
City: Stockbridge
County: Henry
AIRS #: 04-13-151-00025

Application #: TV-804646
Date Application Received: February 23, 2024
Permit No: 4922-151-0025-V-05-0

Program	Review Engineers	Review Managers
SSPP	Alexander Lagunas	Cynthia Dorrough
ISMU	Bob Scott	Dan McCain
SSCP	Sherry Waldron	William Fleming
Toxics	Sherry Waldron	William Fleming
Permitting Program Manager		Steve Allison

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: Transcontinental Gas Pipe Line Company, LLC – Compressor Station 120

2. Parent/Holding Company Name

Transcontinental Gas Pipe Line Company, LLC

3. Previous and/or Other Name(s)

Transco Compressor Station 120
Transcontinental Gas Pipe Line Company – Compressor Station 120

4. Facility Location

638 Valley Hill Road
Stockbridge, Georgia 30281

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

This facility is located in an area of attainment.

B. Site Determination

There are no other facilities which could 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
4922-151-0025-V-04-0	September 5, 2019	Title V Renewal
4922-151-0025-V-04-1	July 11, 2021	Incorporation of ozone season NO_X emission rate for Mainline Units No. 1 through 15 (Source Codes: ML1 through ML15)

D. Process Description

1. SIC Codes(s)

4922

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 natural gas compressor station. It does not make a "product".

3. Overall Facility Process Description

Transcontinental Gas Pipe Line Company, LLC – Compressor Station 120 is designated for natural gas compression/transmission. Natural gas combustion engines and a turbine are used to drive compression which move natural gas through the transmission line. All combustion equipment located at the facility is fired with pipeline-quality natural gas.

4. Overall Process Flow Diagram

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

E. Regulatory Status

1. PSD/NSR

The facility is a major source under PSD because emissions of NO_X, CO, and VOC exceed the major source threshold of 250 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_{10}	✓			✓
$PM_{2.5}$	✓			✓
SO_2	✓			✓
VOC	✓	✓		
NO_x	✓	✓		
CO	✓	✓		
TRS	N/A			
H_2S	N/A			
Individual HAP	✓	✓		
Total HAPs	✓	✓		

3. MACT Standards

The facility is a major source of HAPs as it emits more than the major source thresholds for both individual and total HAP emissions.

Compressor Turbine 01 (Source Code: ML16) is a Solar Centaur turbine that is subject to 40 CFR 63 Subpart YYYY. It is an *existing* unit and does not have to meet any of the requirements of this subpart, per 40 CFR 63.6090(b)(4).

The compressor engines (Source Codes: ML01 through ML15) and the emergency generators (Source Codes: AUX1 through AUX3) are subject to 40 CFR 63 Subpart ZZZZ. The compressor engines met the definition of *existing spark ignition 2 stroke lean burn (2SLB)* engines. Existing 2SLB engines do not have to meet any of the requirements of this subpart, per 40 CFR 63.6590(b)(3). The emergency generators are *existing emergency engines* that are less than 500 horsepower and must meet work practice and recordkeeping requirements.

4. Program Applicability (AIRS Program Codes)

Program Code	Applicable (y/n)
Program Code 6 - PSD	Y
Program Code 8 – Part 61 NESHAP	N
Program Code 9 - NSPS	Y
Program Code M – Part 63 NESHAP	Y

Regulatory Analysis

II. Facility Wide Requirements

A. Emission and Operating Caps:

None applicable.

B. Applicable Rules and Regulations

None applicable.

C. Compliance Status

None applicable.

D. Permit Conditions

None applicable.

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
ML01	Compressor Engine 01 Cooper GMW-10 (2SLB) 2,500 bhp	40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ 391-3-1-.02(2)(b) 391-3-1-.02(2)(g) 391-3-1-.02(2)(tt) 391-3-1-.02(2)(yy)	N/A	None
ML02	Compressor Engine 02 Cooper GMW-10 (2SLB) 2,500 bhp	40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ 391-3-1-.02(2)(b) 391-3-1-.02(2)(g) 391-3-1-.02(2)(tt) 391-3-1-.02(2)(yy)	N/A	None
ML03	Compressor Engine 03 Cooper GMW-10 (2SLB) 2,500 bhp	40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ 391-3-1-.02(2)(b) 391-3-1-.02(2)(g) 391-3-1-.02(2)(tt) 391-3-1-.02(2)(yy)	N/A	None
ML04	Compressor Engine 04 Cooper GMW-10 (2SLB) 2,500 bhp	40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ 391-3-1-.02(2)(b) 391-3-1-.02(2)(g) 391-3-1-.02(2)(tt) 391-3-1-.02(2)(yy)	N/A	None
ML05	Compressor Engine 05 Cooper GMW-10 (2SLB) 2,500 bhp	40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ 391-3-1-.02(2)(b) 391-3-1-.02(2)(g) 391-3-1-.02(2)(tt) 391-3-1-.02(2)(yy)	N/A	None
ML06	Compressor Engine 06 Cooper GMW-10 (2SLB) 2,500 bhp	40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ 391-3-1-.02(2)(b) 391-3-1-.02(2)(g) 391-3-1-.02(2)(tt) 391-3-1-.02(2)(yy)	N/A	None
ML07	Compressor Engine 07 Cooper GMW-10 (2SLB) 2,500 bhp	40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ 391-3-1-.02(2)(b) 391-3-1-.02(2)(g) 391-3-1-.02(2)(tt) 391-3-1-.02(2)(yy)	N/A	None
ML08	Compressor Engine 08 Cooper GMWA-10 (2SLB) 2,625 bhp	40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ 391-3-1-.02(2)(b) 391-3-1-.02(2)(g) 391-3-1-.02(2)(tt) 391-3-1-.02(2)(yy)	N/A	None

Emission Units		Applicable Requirements/Standards	Air Pollution Control Devices	
ID No.	Description		ID No.	Description
ML09	Compressor Engine 09 Cooper GMWA-10 (2SLB) 2,625 bhp	40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ 391-3-1-.02(2)(b) 391-3-1-.02(2)(g) 391-3-1-.02(2)(tt) 391-3-1-.02(2)(yy)	N/A	None
ML10	Compressor Engine 10 Cooper GMWA-10 (2SLB) 3,400 bhp	40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ 391-3-1-.02(2)(b) 391-3-1-.02(2)(g) 391-3-1-.02(2)(tt) 391-3-1-.02(2)(yy)	N/A	None
ML11	Compressor Engine 11 Cooper 10V-250 (2SLB) 3,400 bhp	40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ 391-3-1-.02(2)(b) 391-3-1-.02(2)(g) 391-3-1-.02(2)(tt) 391-3-1-.02(2)(yy)	N/A	None
ML12	Compressor Engine 12 Cooper 10V-250 (2SLB) 3,400 bhp	40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ 391-3-1-.02(2)(b) 391-3-1-.02(2)(g) 391-3-1-.02(2)(tt) 391-3-1-.02(2)(yy)	N/A	None
ML13	Compressor Engine 13 Cooper 10V-250 (2SLB) 3,400 bhp	40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ 391-3-1-.02(2)(b) 391-3-1-.02(2)(g) 391-3-1-.02(2)(tt) 391-3-1-.02(2)(yy)	N/A	None
ML14	Compressor Engine 14 Cooper 10V-250 (2SLB) 3,400 bhp	40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ 391-3-1-.02(2)(b) 391-3-1-.02(2)(g) 391-3-1-.02(2)(tt) 391-3-1-.02(2)(yy)	N/A	None
ML15	Compressor Engine 15 Cooper 10V-250 (2SLB) 3,400 bhp	40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ 391-3-1-.02(2)(b) 391-3-1-.02(2)(g) 391-3-1-.02(2)(tt) 391-3-1-.02(2)(yy)	N/A	None
ML16	Compressor Turbine 01 Solar Centaur 40-4500S 4,600 bhp Manufactured: 1980	40 CFR 60 Subpart A 40 CFR 60 Subpart GG 40 CFR 63 Subpart A 40 CFR 63 Subpart YYYY 391-3-1-.02(2)(b) 391-3-1-.02(2)(g) 391-3-1-.02(2)(tt) 391-3-1-.02(2)(yy)	N/A	None
AUX1	Generator Engine 01 Cooper JS-5G (4SRB) 375 bhp Manufactured: 1951	40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ 391-3-1-.02(2)(b) 391-3-1-.02(2)(g)	N/A	None

Emission Units		Applicable Requirements/Standards	Air Pollution Control Devices	
ID No.	Description		ID No.	Description
AUX2	Generator Engine 02 Cooper JS-5G (4SRB) 375 bhp Manufactured: 1951	40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ 391-3-1-.02(2)(b) 391-3-1-.02(2)(g)	N/A	None
AUX3	Generator Engine 03 Cooper JS-5G (4SRB) 375 bhp Manufactured: 1951	40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ 391-3-1-.02(2)(b) 391-3-1-.02(2)(g)	N/A	None
EmGen	Generator Engine 04 Olympian G75F1S (4SRB) 148 bhp Manufactured: Jan 1998	40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ 391-3-1-.02(2)(b) 391-3-1-.02(2)(g)	N/A	None

* 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.

The facility has renamed and reidentified the sources in Application #804646. The compressor engines (Source Codes: ML01 through ML15) were previously identified as Mainline Units No. 1 through No. 15. The compressor turbine (Source Code: ML16) was previously identified as Mainline Unit No. 16 (Source Code: T1). The generator engines (Source Code: AUX1, AUX2, and AUX3) were previously identified as Emergency Generator Unit No. 1 through No. 3. Generator Engine (Source Code: EmGen) was previously not listed in the equipment list.

B. Equipment & Rule Applicability

Emission and Operating Caps:

The compressor turbine (Source Code: ML16) is limited to 4,400 hours of operation during any 12 consecutive month period and the NO_X emissions are limited to 18.0 lb/hr. These limits were accepted by the facility in order to avoid PSD review.

Rules and Regulations Assessment:

40 CFR 60 Subpart GG – "Standards of Performance for Stationary Gas Turbines"

Applicable to the compressor turbine (Source Code: ML16).

This subpart applies to stationary gas turbines with a heat input at peak load equal to or greater than 10 MMBtu/hr and constructed after October 3, 1977.

The compressor turbine has a heat input capacity of 51.9 MMBtu/hr and was manufactured and installed in 1980, and thus is subject to this subpart. The turbine is subject to NO_X and SO_2 emission standards; however, PSD Avoidance imposes a more stringent standard for NO_X emissions. SO_2 emissions are limited to a total sulfur fuel content of no more than 0.8 percent, by weight.

40 CFR 60 Subpart JJJJ – "Standards of Performance for Stationary Spark Ignition Internal Combustion Engines"

Not applicable.

This subpart applies to stationary combustion engines constructed on July 1, 2007 or later.

The compressor engines (Source Codes: ML01 through ML15) and the generator engines (Source Codes: AUX1, AUX2, AUX3, and EmGen) were constructed prior to July 1, 2007 and thus not subject to this subpart.

40 CFR 60 Subpart KKKK – "Standards of Performance for Stationary Combustion Turbines"

Not applicable.

This subpart applies to combustion turbines constructed, modified, or reconstructed after February 18, 2005 and have a heat input greater than 10 MMBtu/hr.

The compressor turbine (Source Code: ML16) was constructed prior to February 18, 2005 and thus is not subject to this subpart.

40 CFR 63 Subpart YYYY – "National Emission Standards for Hazardous Air Pollutants for Stationary Combustion Turbines"

Applicable to the compressor turbine (Source Code: ML16).

This subpart applies to stationary combustion turbines located at major sources of HAP emissions.

The facility is a major source of HAP emissions and thus the turbine is subject to this subpart. The turbine is considered an *existing* turbine because it was constructed on or before January 14, 2003. Per 40 CFR 63.6090(b)(4), *existing* turbines do not have to meet the requirements of this subpart.

40 CFR 63 Subpart ZZZZ – "National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines"

Applicable to the compressor engines (Source Codes: ML01 through ML15) and the generator engines (Source Codes: AUX1, AUX2, AUX3, and EmGen).

This subpart applies to stationary combustion engines located at a major source of HAP emissions.

The facility is a major source of HAP emissions and thus the compressor engines and the generator engines are subject to this subpart. The compressor engines are *existing* two stroke lean burn (2SLB) engines because they were constructed prior to December 19, 2002 and have a site rating greater than 500 bhp. Per 40 CFR 63.6590(b)(3)(i), *existing 2SLB* stationary RICE with a site rating of more than 500 bhp located at a major source of HAP emissions do not have to meet the requirements of this subpart.

The generator engines are *existing* emergency generators because they have a site rating of less than or equal to 500 bhp and commenced construction before June 13, 2006. These engines are subject to Item 1 of Table 2c of this subpart, which includes maintenance requirements.

391-3-1-.02(2)(b) – "Visible Emissions"

Applicable to the compressor engines (Source Codes: ML01 through ML15), the compressor turbine (Source Code: ML16), and the generator engines (Source Codes: AUX1, AUX2, AUX3, and EmGen).

This rule applies to sources also subject to other emission limitation under the Georgia Rules.

The compressor engines, the compressor turbine, and the generator engines are subject to other rules and thus are subject to the visible emission standard of this rule.

391-3-1-.02(2)(g) – "Sulfur Dioxide"

Applicable to the compressor engines (Source Codes: ML01 through ML15), the compressor turbine (Source Code: ML16), and the generator engines (Source Codes: AUX1, AUX2, AUX3, and EmGen).

This rule applies to fuel-burning sources. All fuel-burning sources below 100 MMBtu/hr shall not burn fuel more than 2.5 percent sulfur, by weight.

391-3-1-.02(2)(tt) – "VOC Emissions from Major Sources"

Applicable to the compressor engines (Source Codes: ML01 through ML15) and the compressor turbine (Source Code: ML16).

This rule applies to sources that have potential VOC emissions exceeding 25 tons-per-year in a listed county.

The facility is located in Henry County, a listed county, and has sources exceeding 25 tons-per-year and are subject to this rule and VOC RACT.

391-3-1-.02(2)(yy) – "Emissions of Nitrogen Oxides from Major Sources"

Applicable to the compressor engines (Source Codes: ML01 through ML15) and the compressor turbine (Source Code: ML16).

This rule applies to sources that have potential NO_X emission exceeding 25 tons-per-year in a listed county.

The facility is located in Henry County, a listed county, and has sources exceeding 25 tons-per-year and as subject to this rule and NO_X RACT.

391-3-1-.02(2)(mmm) – "NO_X Emissions from Stationary Gas Turbines and Gas Engines used to Generate Electricity"

Applicable to the generator engines (Source Codes: AUX1, AUX2, AUX3, and EmGen).

This rule applies to stationary engines used to generate electricity located in a listed county. *Emergency standby stationary engines* are not subject to the emission limitations of this subpart.

The generator engines are stationary engines used to generate electricity in Henry County, a listed county and thus are subject to this subpart. The generator engines are considered *emergency standby stationary engines* and must meet the definition in 391-3-1-.02(2)(mmm)(4). The compressor engines do not generate electricity and thus are not subject to this rule.

C. Permit Conditions

Conditions have been retained from Permit No. 4922-151-0025-V-04-0/1. Minor changes have been made, including re-ordering.

Condition 3.2.1 sets a NO_X emission standard for the compressor turbine (Source Code: ML16), per PSD Avoidance. *Condition 3.2.1 (previously Condition 3.2.2) was listed first since it contains a NO_X emissions limitation.*

Condition 3.2.2 sets a limit on the hours of operation of the compressor turbine (Source Code: ML16), per PSD Avoidance.

Condition 3.3.1 establishes the applicability of 40 CFR 60 Subpart A and 40 CFR 60 Subpart GG to the operation of the compressor turbine (Source Code: ML16).

Condition 3.3.2 sets a sulfur fuel content standard to the fuel fired in the compressor turbine (Source Code: ML16), per 40 CFR 60 Subpart GG.

Condition 3.3.3 establishes the applicability of 40 CFR 63 Subpart A and 40 CFR 63 Subpart YYYY to the operation of the compressor turbine (Source Codes: ML16).

Conditions 3.3.4 through 3.3.10 have been organized to appear in numerical order.

Condition 3.3.4 establishes the applicability of 40 CFR 63 Subpart A and 40 CFR 63 Subpart ZZZZ to the operation of the generator engines (Source Codes: AUX1, AUX2, AUX3, and EmGen).

Condition 3.3.5 sets the operating standards for the generator engines (Source Codes: AUX1, AUX2, AUX3, and EmGen), including maintenance schedule, per 40 CFR 63 Subpart ZZZZ. *Previously Condition 3.3.6*

Condition 3.3.6 requires the operating standards set in Condition 3.3.5 apply at all times and operation of the equipment to minimize emissions, per 40 CFR 63 Subpart ZZZZ. *Previously Condition 3.3.11.*

Condition 3.3.7 requires the Permittee to operate the generator engines (Source Codes: AUX1, AUX2, AUX3, and EmGen) according to the manufacturer's instructions, per 40 CFR 63 Subpart ZZZZ. *Previously Condition 3.3.8.*

Condition 3.3.8 requires the minimization of idle time and startup time of the generator engines (Source Codes: AUX1, AUX2, AUX3, and EmGen), per 40 CFR 63 Subpart ZZZZ. *Previously Condition 3.3.7.*

Condition 3.3.9 permits an oil analysis program to extend the maintenance schedule as part of the operating limitations set in Condition 3.3.5, per 40 CFR 63 Subpart ZZZZ.

Condition 3.3.10 sets the criteria for the generator engines (Source Codes: AUX1, AUX2, AUX3, and EmGen) to be considered emergency generators under 40 CFR 63 Subpart ZZZZ. *Similar to previous Condition 3.3.10, expanded on.*

Condition 3.4.1 sets the visible emissions standard, per Rule (b).

Condition 3.4.2 sets the fuel sulfur content to the fuel burned in the compressor engines (Source Codes: ML01 through ML15), the compressor turbine (Source Code: ML16), and the generator engines (Source Codes: AUX1, AUX2, AUX3, and EmGen), per Rule (g).

Condition 3.4.3 requires the use of good combustion control practices for the operation of the compressor engines (Source Codes: ML01 through ML15) and the compressor turbines (Source Code: ML15), per Rule (tt).

Condition 3.4.4 sets a NO_X limit to the compressor engines (Source Codes: ML01 through ML15), per Rule (yy).

Condition 3.4.5 limits the operation of the generator engines (Source Codes: AUX1, AUX2, AUX3, and EmGen) to meet the definition of *emergency standby stationary engines*, per Rule (mmm). *New to permit, separated from previous Condition 3.3.10.*

Condition 3.4.6 limits emissions of nitrogen oxides from the generator engines (Source Codes: AUX1, AUX3, AUX3, and EmGen) if they cannot meet the definition set in Condition 3.4.5, per Rule (mmm). *New to permit.*

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

Condition 4.2.1 requires a performance test on the compressor turbine (Source Code: ML16) to demonstrate compliance with Condition 3.2.1 and to re-establish the outlet combustor temperature for Condition 5.2.1.

Condition 4.2.2 requires a NO_X compliance test whenever either the gas generator assembly or combustion can on the compressor turbine (Source Code: ML16) are replaced.

The compressor turbine (Source Code: ML16) is a Solar Centaur turbine. When the turbine is in need of an overhaul, it is conducted as part of Solar's turbine overhaul program. During an overhaul, the exiting turbine is removed, and an "exchange" turbine is installed during the same shutdown time period. Prior to shipment to a facility, the "exchange" turbine is tested at Solar's overhaul facility to document that all of a facility's original performance specifications and emissions standards are met.

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

Formation of NO_X emissions from the compressor turbine (Source Code: ML16) is related to the temperature of the combustion gases at the outlet of the combustor. As the combustor outlet temperature increases, the general trend is for NO_X emissions to increase. As a result, the combustor outlet temperature is monitored.

Formation of NO_X emissions from the compressor engines (Source Code: ML01 through ML15) is related to several engine operating parameters. The Division has determined that the three most useful are engine speed, ignition timing, and air manifold pressure. As a result, these parameters are monitored. In addition, a NO_X survey is required on these engines and may be conducted using a portable analyzer and is required to rotate among the engines.

Condition 5.2.1 requires a device to measure the combustor outlet temperature on the compressor turbine (Source Code: ML16).

Condition 5.2.2 requires monitoring device to measure:

1. Engine speed on the compressor engines (Source Code: ML01 through ML15) hourly,
2. Air manifold pressure on the compressor engines hourly
3. Percent Engine Load on the compressor engines hourly
4. Air manifold temperature on the compressor engines hourly
5. Hours of operation of the compressor engines daily
6. Ignition timing on the compressor engines quarterly
7. Fuel flow on the compressor engines hourly
8. Engine trapped volume on the compressor engines hourly
9. Non-resettable hour meter on the compressor turbine (Source Code: ML16)
10. Non-resettable hour meter on the generator engines (Source Codes: AUX1, AUX2, AUX3, and EmGen)

Condition 5.2.3 allows the facility not to monitor the sulfur content of the natural gas fired in the compressor turbine (Source Code: ML16) if the natural gas meets the definition in 40 CFR 60.331(u), per 40 CFR 60 Subpart GG.

Condition 5.2.4 requires a survey on at least one engine in each engine group and lists the criteria of these measurements.

C. Compliance Assurance Monitoring (CAM)

Not 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 semiannual basis.

B. Specific Record Keeping and Reporting Requirements

Condition 6.2.1 requires records of the hours of operation of the compressor turbine (Source Code: ML16) to show compliance with Condition 3.2.2.

Condition 6.2.2 requires a summary of the 12-consecutive month total of hours of operation of the compressor turbine (Source Code: ML16) in the semiannual report required in Condition 6.1.4.

Condition 6.2.3 requires an operating parameters summary document, listing the values or ranges of the engine speed, air manifold pressure, and engine timing, as determined during performance tests.

Condition 6.2.4 lists requirements for the compliance report related to the operation of the generator engines (Source Codes: AUX1, AUX2, AUX3, and EmGen) with the report required in Condition 6.1.4, per 40 CFR 63 Subpart ZZZZ.

Condition 6.2.5 requires records related to the operation of the generator engines (Source Codes: AUX1, AUX2, AUX3, and EmGen), per 40 CFR 63 Subpart ZZZZ.

Condition 6.2.6 requires records of the manufacturer's instructions or the maintenance plan, per 40 CFR 63 Subpart ZZZZ. *New to permit.*

Condition 6.2.7 requires records of maintenance on the generator engines (Source Codes: AUX1, AUX2, AUX3, and EmGen), per 40 CFR 63 Subpart ZZZZ. *Previously Condition 6.2.6.*

Condition 6.2.8 requires records of the hours of operation of the generator engines (Source Codes: AUX1, AUX2, AUX3, and EmGen). *Previously Condition 6.2.7.*

VII. Specific Requirements

A. Operational Flexibility

- Condition 7.1.2 allows the Permittee to change out certain components of the compressor turbine (Source Code: ML16) with refurbished equipment. The Permittee is required to notify the Division and conduct tests as required in Condition 4.2.2.

B. Alternative Requirements

- Not applicable.

C. Insignificant Activities

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

D. Temporary Sources

- None applicable.

E. Short-Term Activities

- None applicable.

F. Compliance Schedule/Progress Reports

- None applicable.

G. Emissions Trading

- None applicable.

H. Acid Rain Requirements

- None applicable.

I. Stratospheric Ozone Protection Requirements

The standard permit condition pursuant to 40 CFR 82 Subpart F has been retained 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.

J. Pollution Prevention

- None applicable.

K. Specific Conditions

- None applicable.

VIII. General Provisions

Generic provisions have been included in this permit to address the requirements in 40 CFR Part 70 that apply to all Title V sources, and the requirements in Chapter 391-3-1 of the Georgia Rules for Air Quality Control that apply to all stationary sources of air pollution.

Template Condition 8.14.1 was updated in September 2011 to change the default submittal deadline for Annual Compliance Certifications to February 28.

Template Condition Section 8.27 was updated in August 2014 to include more detailed, clear requirements for emergency generator engines currently exempt from SIP permitting and considered insignificant sources in the Title V permit.

Template Condition Section 8.28 was updated in August 2014 to more clearly define the applicability of the Boiler MACT or GACT for major or minor sources of HAP.

Addendum to Narrative

The 30-day public review started on month day, year and ended on month day, year. Comments were/were not received by the Division.

//If comments were received, state the commenter, the date the comments were received in the above paragraph. All explanations of any changes should be addressed below.//