

Facility Name: **Hawk Road Energy Facility**
City: Franklin
County: Heard
AIRS #: 04-13-149-00005

Application #: TV-825404
Date Application Received: March 15, 2024
Permit No: 4911-149-0005-V-09-0

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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: Hawk Road Energy Facility
2. Parent/Holding Company Name

Hawk Road Energy Facility. Oglethorpe Power Corporation acquired Heard County Power from Dynegy Incorporated on May 1, 2009. Permit Number 4911-149-0005-V-06-0 was for an ownership change from Heard County Power to Oglethorpe Power Corporation.

3. Previous and/or Other Name(s)

Heard County Power is the previous name for the facility.

4. Facility Location

624 Hawk Road
Franklin, GA 30217

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

Heard County has been designated an attainment area.

B. Site Determination

There are no other facilities which could possibly be considered contiguous or adjacent and under common control with the Title V site. The electric power generating facility, Tenaska Georgia Partners, L.P. AIRS No. 14900004, is located less than a mile away from the Title V site but is not affiliated with Hawk Road Energy Facility.

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
4911-149-0005-V-08-0	September 26, 2019	Title V Renewal
4911-149-0005-V-08-1	November 20, 2023	Acid Rain Application Renewal

D. Process Description

1. SIC Codes(s)

4911

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 facility produces electricity for sale.

3. Overall Facility Process Description

The Hawk Road Energy Facility (hereinafter "facility") consists of three Siemens Westinghouse 501F simple cycle combustion turbines (CT1, CT2, and CT3). The combustion turbines, CT1, CT2, and CT3, have design power outputs of 179 megawatts (MW), 179 MW, and 208 MW, respectively. All three combustion turbines have a maximum heat input of 1,820 million British thermal units per hour (MMBtu/hr), each. All three units fire natural gas exclusively, and each unit exhausts through its own stack. The formation of nitrogen oxides (NO_x) from each of the combustion turbines are minimized through the use of Dry Low NO_x burner systems. Water, injected into the pilot nozzle of the combustion basket, may be added to further reduce the NO_x emissions.

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 PSD major source because it has potential emissions of nitrogen oxides (NO_x) and carbon monoxide (CO) greater than 250 tpy (it is not one of the 28 named source categories under PSD).

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	Yes			✓
PM ₁₀	Yes			✓
PM _{2.5}	Yes			✓
SO ₂	Yes			✓
VOC	Yes			✓
NO _x	Yes	✓		
CO	Yes	✓		
TRS	N/A			
H ₂ S	N/A			
Individual HAP	Yes			✓
Total HAPs	Yes			✓

3. MACT Standards

40 CFR 63 Subpart ZZZZ, “NESHAP for Stationary Reciprocating Internal Combustion Engines (RICE)”, gives emission standards and work practice requirements for stationary RICE at both major and area sources of HAP. The rule defines existing sources at area sources as units that were constructed or reconstructed before June 12, 2006. Otherwise, the unit is considered a new RICE. The Hawk Road Energy facility operates one 250 kW emergency diesel generator and one 275 hp emergency fire water pump, both of which are considered existing units. The engines, which meet the definition of emergency units, do not have any emission limitations or testing requirements per the rule. The Hawk Road Energy facility is in compliance with all applicable requirements in the rule, including the generator and fire water pump each being equipped with a non-resettable hour meter. These requirements are covered in the General Section 8 of the permit with Condition 8.27.3. The engines were included with the insignificant units based on emission levels. If the equipment were listed in Table 3.1, where the significant equipment is listed, then actual permit conditions citing the rule, would be in the permit instead of just the general Condition. 8.27.3.

4. Program Applicability (AIRS Program Codes)

Program Code	Applicable (y/n)
Program Code 6 - PSD	Yes
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

Not applicable.

C. Compliance Status

The facility did not indicate any non-compliance issues in the application.

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
CT1	Siemens Westinghouse 501F Combustion Turbine	391-3-1-.02(2)(b) 391-3-1-.02(2)(g) 391-3-1-.02(2)(nnn) 40 CFR 52.21(j) 40 CFR 60 Subpart A 40 CFR 60 Subpart GG Acid Rain Regulations CSAPR Regulations	DLN WI	Dry Low NOx Combustor Water Injection
CT2	Siemens Westinghouse 501F Combustion Turbine	391-3-1-.02(2)(b) 391-3-1-.02(2)(g) 391-3-1-.02(2)(nnn) 40 CFR 52.21(j) 40 CFR 60 Subpart A 40 CFR 60 Subpart GG Acid Rain Regulations CSAPR Regulations	DLN WI	Dry Low NOx Combustor Water Injection
CT3	Siemens Westinghouse 501F Combustion Turbine	391-3-1-.02(2)(b) 391-3-1-.02(2)(g) 391-3-1-.02(2)(nnn) 40 CFR 52.21(j) 40 CFR 60 Subpart A 40 CFR 60 Subpart GG Acid Rain Regulations CSAPR Regulations	DLN WI	Dry Low NOx Combustor Water Injection

* 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.

B. Equipment & Rule Applicability

Equipment and Rule Applicability for this renewal permit is based on the requirements for the emission units as permitted in existing Permit No. 4911-149-0005-V-08-0.

Combustion Turbine, CT1, CT2, and CT3

The combustion turbines are subject to the requirements of 40 CFR 60, Subpart GG – “Standards of Performance for Stationary Gas Turbines” because they each have a heat input at peak load equal to or greater than 10.7 gigajoules per hour [10.14 MMBtu/hr], based on the lower heating value of the fuel fired; and because the turbines were constructed after October 3, 1977. The NSPS General Provisions [40 CFR 60, Subpart A] also apply to each turbine. In addition, each turbine is subject to 40 CFR 52.21, Prevention of Significant Deterioration, because the facility has the potential to emit greater than or equal to 250 tons per year of a criteria pollutant. This facility is not one of the 28 named sources because the facility does not utilize steam in electric power generation.

The allowable NOx emission rate from this Equipment Group is specified by New Source Performance Standards (NSPS) Subpart GG [40 CFR 60.332(b)], Georgia Air Quality Rule 391-3-1-.02(2)(nnn)

and by BACT. BACT specifies the most stringent NO_x emission rate, and therefore the BACT limit subsumes the NSPS Subpart GG limit. The limit established under the PSD review is 15 ppmvd @ 15% oxygen. The facility can reasonably achieve this limit by utilizing the Dry Low NO_x burner technology and the retrofitted water injection nozzle technology.

The Georgia Air Quality Rule (nnn) NO_x limit of 30 ppmvd at 15% oxygen is included in the permit as a separate limit even though it is greater than the NO_x PSD limit of 15 ppmvd at 15% oxygen, because the facility is subject to the SIP emission standard during startup and shutdown. Since language has been included in the permit to exclude periods of startup and shutdown for the PSD limit, the SIP emission standard is not subsumed by the PSD limit and is not being excluded in the startup and shutdown conditions.

As there are no national or state air quality rules regarding specific standards for CO and combustion turbines, only PSD review determined the allowable CO limit for the combustion turbines. The limit placed on the turbines is based on good combustion design. The CO emissions limit is 25 ppmvd @ 15% oxygen as specified by the manufacturer's design specifications.

The allowable particulate matter (PM) emission rate for the combustion turbines is established pursuant to 40 CFR 52.21(j) which specifies the application of best available control technology (BACT). For combustion turbines, BACT for PM is achieved by firing a clean burning fuel, natural gas. The limit established under the PSD review is PM emissions less than 0.005 lb/MMBtu.

Sulfur dioxide (SO₂) and sulfuric acid mist, formed from SO₂ and water, are emitted in low quantities because of the use of natural gas, which contains very little sulfur. Therefore, the SO₂ and sulfuric acid mist emissions will remain below the PSD significance threshold if the operation of the facility is limited to 4,000 hours per year. However, the Acid Rain Program regulates the SO₂ emissions from the turbines. The facility is required to adhere to the NSPS Subpart GG Sulfur limit of 0.8 percent by weight sulfur limit, which subsumes Georgia Air Quality rule 391-3-1-.02(2)(g). In order to provide a reasonable assurance of compliance with this regulation, the facility must maintain semiannual records of the sulfur content of the natural gas that is received at the facility.

Volatile organic compound (VOC) emission limits are established only by PSD. Limiting the total hours of operation to 4,000 hours per year provides assurance that the VOC emissions will be less than the PSD significance threshold.

The allowable opacity limit is determined by BACT for PSD and Georgia Rule 391-3-1-.02(2)(b). Georgia Rule (b) is subsumed by the more stringent BACT opacity standard. The PSD review specified a limit of 10% opacity, which will be achieved with the use of the clean burning fuel, natural gas.

During previous Title V permitting processing, the Division added language to allow exclusions during startup and shutdown periods. If during the defined startup and shutdown period an excess emission occurs, the facility may exclude the reading from excess emissions reporting. However, Condition 3.3.4 requires the facility to maintain an annual emissions cap. All emissions, including those during startup and shutdown, are included in the annual emissions calculations. The NO_x emissions cap is 210 tpy for each combustion turbine, giving the facility a NO_x emissions total of 630

tpy. This limitation is based on the PSD application, which uses the 4,000 hours of operation and 15 ppmvd NOx emissions to calculate the total NOx emissions.

The following table illustrates the allowable emissions limits for the combustion turbines at the facility.

Table 1: Allowable Emissions Limits

NOx (annual)	210 tpy per combustion turbine
NOx	15 ppmvd@ 15% O ₂
CO	25 ppmvd@ 15% O ₂
PM	0.005 lb/MMBtu
Opacity	10 %

Cross-State Air Pollution Rule (Transport Rule)

The CSAPR took effect on January 1, 2015. The existing combustion turbines are regulated as “existing units” under CSAPR as discussed in the following regulatory provisions (1) Annual NOx per 40 CFR Part 97.411(b) and Part 97.412; (2) Ozone Season NOx per 40 CFR Part 97.511(b) and Part 97.512; and (3) Annual SO₂ Group 2 in 40 CFR Part 97.711(b) and Part 97.712.

250 kW Emergency Diesel Generator, 275 hp Firewater Pump

40 CFR 63 Subpart ZZZZ

40 CFR 63 Subpart ZZZZ NESHAP for Stationary Reciprocating Internal Combustion Engines (RICE) gives emissions standards and work practice requirements for stationary RICE at both major and area sources of HAP. The rule defines existing sources at area sources as units that were constructed or reconstructed before June 12, 2006. Otherwise, the unit is considered a new RICE. Per the application, the Hawk Road facility operates one 250 kW emergency diesel generator and one 275 hp, both of which are considered existing units. The engines, which meet the definitions of emergency units, do not have any emission limitations or testing requirements per the rule. The facility stated in the application that it is in compliance with all applicable requirements in the rule, including the generator and fire pump each being equipped with a non-resettable hour meter.

C. Permit Conditions

Condition 3.3.1 places a twelve consecutive month operating limit of 4,000 hours for each combustion turbine, CT1, CT2 and CT3.

Condition 3.3.2 allows only fire pipe-line quality natural gas to be fired in combustion turbines CT1, CT2, and CT3.

Condition 3.3.3 states the BACT limits for NOx, CO, particulate matter, and opacity in the discharge from the combustion turbines CT1, CT2, and CT3.

Condition 3.3.4 places a twelve consecutive month NOx emissions cap of 210 tons on each combustion turbine, CT1, CT2 and CT3.

Condition 3.3.5 states the NO_x limit per NSPS Subpart GG for each combustion turbine, CT1, CT2 and CT3. The condition has been modified to remove the exemption for startup and shutdown periods to match the regulation and to define the variables used in the equation, as requested in the renewal application.

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

Not 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

The combustion turbines CT1, CT2, and CT3 are subject to BACT limits of 15 ppm (corrected to 15 percent oxygen) for NO_x. This limit subsumes 40 CFR 60 Subpart GG and Georgia Rule 391-3-1-.02(2)(nnn). Additionally, the combustion turbines are subject to the monitoring requirements of the Acid Rain Rule. The facility is required to use the Continuous Emissions Monitoring Systems (CEMS) to monitor emissions of NO_x and report (by Condition 6.1.7) any 1-hour period during which the average NO_x emissions are equal to or greater than 15 ppm corrected to 15 percent oxygen.

The NO_x CEMS will also be used to determine the NO_x mass emission rate. This will be used in reporting to provide assurance of compliance with the annual NO_x emissions cap each combustion turbine has. The facility must now obtain and record the pound per MMBtu heat input based on the lower heating value.

The turbines are also subject to CO emission limitation of 25 ppm corrected to 15 percent oxygen. The SIP Permit required that each turbine be tested for results at the maximum and minimum loads in the normal operating range. The test results showed the turbines to be well in compliance with the CO limitation at both maximum and minimum load. All units were tested at a minimum load of approximately 122 MW. The likelihood that the facility will have a CO emission violation is very low (See Test Results of the May 26, 2001, performance test below), therefore CO monitoring is not necessary.

Test Results: Carbon Monoxide Emissions

	CT1		CT2		CT3	
	Run 1	Run 2	Run 1	Run 2	Run 1	Run 2
Operating Load (MW)	124.5	178.1	123.1	166.6	121	174.4
CO Emissions (PPM @15% O₂)	1.5	<1.0	3.2	<1.0	<1.0	<1.0

The visible emission limit from Georgia Rule 391-3-1-.02(2)(b) is subsumed by PSD, therefore the limit is more stringent for the turbines. However, the Division decided that the use of the clean burning fuel, natural gas, meets the requirements of BACT and thus there is a negligible chance of the visible emissions exceeding the limit. Therefore, the Division is not imposing monitoring of a visible emission/particulate matter or a surrogate parameter to verify compliance.

To assure compliance with the operational hours limit specified by Condition 3.3.1, the operating hours of each combustion turbine are monitored and recorded monthly.

Condition 5.2.1 requires a CEMS for measuring nitrogen oxides (NO_x) concentrations in ppm and diluent concentration (oxygen) in percent (%) in the discharge to the atmosphere from each simple cycle combustion turbine (Source Codes CT1, CT2, and CT3).

Condition 5.2.2 requires a system to continuously monitor and record the cumulation of hours of operation for each turbine, CT1, CT2, and CT3, and the quantity of natural gas, burned in each combustion turbine in units of million BTUs per hour.

Condition 5.2.3 requires the calculation of a three-hour average NO_x emission rate (in ppmvd corrected to 15% oxygen) for each turbine using the NO_x emission rate determined in accordance with Condition 5.2.1a. This condition applies from May 1 through September 30 of each year. The condition has been modified to include additional language to clarify the calculation methodology for the NO_x 3-hour rolling averages prepared during the ozone season for demonstrating compliance with the NO_x emission limit in Georgia Rule (nnn).

C. Compliance Assurance Monitoring (CAM)

Not Applicable. As outlined in 40 CFR 64.2(b)(1)(vi), emission limitations or standards for which a Title V permit specifies a continuous monitoring method are exempt from the CAM regulations. Since NO_x CEMS are used for each CT, the requirements of 40 CFR 64 do 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.

B. Specific Record Keeping and Reporting Requirements

Subpart GG [40 CFR 60.334(b)(2)] requires daily monitoring of the sulfur content and nitrogen content of the natural gas. The facility's existing permit requires that the sulfur content of the natural gas be tracked and recorded on a semi-annual basis. Hawk Road Energy Facility will be required to maintain semi-annual analysis certifications, provided by the supplier, for the sulfur content of the natural gas burned in the turbines, and any semi-annual analysis of which shows a sulfur content in excess of 0.8 weight percent must be reported as an excess emission, as defined by Subpart GG. Semiannual analysis by the fuel supplier is an alternate fuel sampling frequency for combustion turbines subject to Subpart GG and was approved by EPA Region 4, March 31, 1988. The facility is also required to record the hours of operation for each combustion turbine.

Condition 6.2.1 requires the record keeping of a semiannual analysis of the gas obtained from the supplier in order to monitor the sulfur content of natural gas burned in the combustion turbines (Source Codes CT1, CT2, and CT3).

Condition 6.2.2 states that no determination of the nitrogen content of the natural gas burned in the combustion turbines (Source Codes CT1, CT2, and CT3) is required. By claiming an F-value of zero and not claiming an allowance for fuel bound nitrogen, the facility is not required to monitor the nitrogen content of the fuel as described in 40 CFR 60.334(h)(2).

Condition 6.2.3 is the recordkeeping requirement for the mass emission rate (lb/hr) of NO_x from each combustion turbine (Source Codes CT1, CT2, and CT3).

Condition 6.2.4 is the recordkeeping requirement for the data required by Condition 5.2.2a, concerning total hours of operation of each combustion turbine (Source Codes CT1, CT2, and CT3) and twelve-consecutive month total hours of operation.

Condition 6.2.5 containing the quarterly reporting requirements has been moved to Condition 6.1.7d. i. and ii. as requested in the renewal application. The condition is reserved to maintain the numbering of the remaining permit conditions for recordkeeping purposes.

Conditions 6.2.6 through 6.2.9 incorporate recordkeeping and reporting for startup and shutdown and the NO_x annual limit. Condition 6.2.6 regarding definitions of startup and shutdown has been modified to include special testing conditions as requested in the renewal application. Condition 6.2.7 requires the company to record the duration of each startup and shutdown for each combustion turbine.

Condition 6.2.10 contains the equation that corrects emissions of nitrogen oxides to 15 percent oxygen.

VII. Specific Requirements

A. Operational Flexibility

This 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 their permit already provides sufficient flexibility for the facility. The applicant did not include any alternative operating scenarios in their Title V permit application.

B. Alternative Requirements

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

C. Insignificant Activities

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

C. Temporary Sources

This section is not applicable to this facility. 40 CFR 70.6(e) requires the Division to provide for the permitting of certain types of temporary sources. This facility currently has no such sources and is unlikely to have such sources in the future. However, they may add temporary sources provided that the facility follows any necessary regulatory procedures for the operation of such sources. This may include amending the Title V permit, if necessary.

D. Short-Term Activities

This facility is not requesting to operate any short-term activities.

F. Compliance Schedule/Progress Reports

No compliance schedule or progress reports are required.

G. Emissions Trading

This facility is not involved in any emission trading programs besides being part of the Acid Rain Program.

H. Acid Rain Requirements

The facility is subject to the requirements in Title IV of the Clean Air Act. They are subject to 40 CFR 72 (permits), 73 (sulfur dioxide), and 75 (monitoring). They are not subject to the nitrogen oxide provisions (40 CFR 76) of the Acid Rain regulations, because the turbines do not have the ability to burn coal.

Hawk Road Energy Facility submitted a Phase II Permit Application for a renewal of the Phase II Acid Rain Permit for the years 2024 through 2028 to satisfy the requirements of 40 CFR 72.3(b)(2). The Phase II Acid Rain Application is located in Appendix D of the permit. The facility is required, under 40 CFR 75, to monitor certain pollutants and parameters, including NO_x emissions, SO₂ emissions, CO₂ emissions, and heat input. These pollutants and parameters are reported directly to EPA, electronically, on a quarterly basis.

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 Hawk Road Energy Facility has air conditioners, chillers and refrigerators, Subpart F is an applicable requirement.

J. Pollution Prevention

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

K. Specific Conditions

None applicable.

L. Cross State Air Pollution Rule (CSAPR) Allowance Trading Program Requirements

The U.S. EPA issued the Cross-State Air Pollution Rule (CSAPR) in July 2011. In the CSAPR rulemaking, EPA determined that air pollution transported from EGUs in Georgia would unlawfully affect other states' ability to attain or maintain the 1997 8-hour Ozone NAAQS, the 1997 Annual PM_{2.5} NAAQS, and the 2006 24-hour PM_{2.5} NAAQS and included Georgia in the CSAPR ozone season NO_x trading program and the annual SO₂ and NO_x trading programs.

In 2017 Georgia updated its rules for Georgia units for CSAPR state trading programs for annual NO_x, annual SO₂ emissions, and ozone season NO_x emissions. The update revised the Georgia Rules for Air Quality Control to include CSAPR as follows: 391–3–1–.02(12) was revised to include Georgia's "Cross State Air Pollution Rule NO_x Annual Trading Program;" 391–3–1–.02(13) was revised to include Georgia's "Cross State Air Pollution Rule SO₂ Annual Trading Program;" and 391–3–1–.02(14) was added to include "Georgia's Cross State Air Pollution Rule NO_x Ozone Season Trading Program."

With a few exceptions, the Georgia rules comprising Georgia's CSAPR state trading program for annual NO_x emissions either incorporated by reference or adopted full-text replacements for all of the provisions of 40 CFR 97.401 through 97.435; the Georgia rules comprising Georgia's CSAPR state trading program for SO₂ emissions either incorporated by reference or adopted full-text replacements for all of the provisions of 40 CFR 97.701 through 97.735; and the Georgia rules comprising Georgia's CSAPR state trading program for NO_x ozone season emissions either incorporated by reference or adopted full-text replacements for all of the provisions of 40 CFR 97.501 through 97.535.

Since the Georgia CSAPR state trading programs have been integrated with the federal CSAPR NO_x Annual Trading Program, the federal CSAPR SO₂ Group 2 Trading Program, and the federal CSAPR NO_x Ozone Season Group 1 Trading Program, respectively, and are substantively identical to the federal trading programs.

Hence, the U.S. EPA website maintains a table indicating the applicable CSAPR programs for Georgia as follows:

States that are affected by the Cross-State Air Pollution Rule (CSAPR)

<u>State</u>	<u>Required to Reduce Emissions of NO_x during the Ozone Season (1997 Ozone NAAQS)</u>	<u>Required to Reduce Emissions of NO_x during the Ozone Season (2008 Ozone NAAQS)</u>	<u>Required to Reduce Annual Emissions of SO₂ and NO_x (1997 Annual PM_{2.5} NAAQS)</u>	<u>Required to Reduce Annual Emissions of SO₂ and NO_x (2006 24-Hour PM_{2.5} NAAQS)</u>	<u>*SO₂ Group</u>
<u>Georgia</u>	<u>X</u>		<u>X</u>	<u>X</u>	<u>2</u>

* The final CSAPR divides the states required to reduce SO₂ into two groups. Both groups must reduce their SO₂ emissions beginning in Phase I. Group 1 states must make significant additional reductions in SO₂ emissions for Phase II in order to eliminate their significant contribution to air quality problems in downwind areas.

Permit Condition 7.15.1 identifies the units subject to CSAPR, and the applicable CSAPR Programs.

Permit Condition 7.15.2 outlines the Annual NO_x, SO₂, and Ozone Season NO_x Emissions Requirements

Permit Condition 7.15.3 outlines the monitoring, reporting, and recordkeeping requirements associated with CSAPR.

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.//