

Facility Name: **Robins Combustion Turbine – Electric Generating Plant**

City: Warner Robins

County: Houston

AIRS #: 04-13-153-00040

Application #: 846123

Date Title V Application Received: June 25, 2024

Permit No: 4911-153-0040-V-05-1

Program	Review Engineers	Review Managers
SSPP	Jada Levers	Cynthia Dorrough
Permitting Program Manager		Steve Allison

Introduction

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

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

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

Table 1: Current Title V Permit and Amendments

Permit/Amendment Number	Date of Issuance	Comments	
		Yes	No
4911-153-0040-V-05-0	July 6, 2023		x

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

The facility is a major source under 40 CFR 52.21 (PSD regulations) because emissions of NO_x, CO, VOC, SO₂, PM, and opacity are subject to the requirements of PSD. Potential emissions of one or more applicable criteria air pollutants (NO_x and CO) equal or exceed 250 tons per year, thus subjecting the facility to this regulation. Please Note that Robins Combustion Turbine – Electric Generating Plant is not one of the listed 28 source categories under the PSD where the major source threshold is 100 tons per year. Other applicable criteria air pollutants (PM, VOC, and SO₂) are subject to PSD, because potential emissions equal or exceed their respective PSD significant emission threshold.

Each combustion turbine was constructed in 1994 and is subject to both 40 CFR 52.21 (PSD) and 40 CFR 60 Subpart GG (NSPS). The PSD limits are much more stringent than the NSPS limits, therefore, the NSPS emissions limits for NO_x and SO₂ are subsumed by PSD emissions limits, while the recordkeeping and reporting requirements of the NSPS have been retained.

The allowable emission rates are carried over from the PSD permit as follows:

Pollutant	Fired Using Natural Gas	Fired Using Fuel Oil
NO _x	25ppm	42ppm
SO ₂		0.5% sulfur content (daily)
		0.3% sulfur content (annual average)
CO	25ppm (100% load)	75ppm
	120ppm (75% load)	
	300ppm (50% load)	
PM	0.01 lb/MMBtu	0.03 lb/MMBtu
VOC	0.06 lb/MMBtu	0.05 lb/MMBtu
Opacity	10%	20%

2. Title V Major Source Status by Pollutant

Table 3: 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			✓
Total GHGs	yes			✓

II. Proposed Modification

A. Description of Modification

Renewal of the Acid Rain Permit for the calendar years 2025 through 2029. The current Acid Rain Permit has been approved through the calendar year 2024, expiring on December 31, 2024. This Acid Rain Permit becomes effective on January 1, 2025.

B. Emissions Change

There is no change in emissions associated with this modification.

C. PSD/NSR Applicability

This modification does not classify as a new major source or major modification for PSD attainment areas.

VIII. Specific Requirements

A. Operational Flexibility

None Applicable.

B. Alternative Requirements

None Applicable.

C. Insignificant Activities

See Attachment B for the list of Insignificant Activities associated with this modification.

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

Part 7.9 of the permit has been updated to include the Acid Rain Permit requirements for the calendar years 2025 through 2029 for Emission Units with ID Nos. CT1 and CT2.

I. Prevention of Accidental Releases

None Applicable.

J. Stratospheric Ozone Protection Requirements

None Applicable.

K. Pollution Prevention

None Applicable.

L. Specific Conditions

None Applicable.

Addendum to Narrative

The 30-day public review started on January 15, 2025, and ended on February 14, 2025. Comments were not received by the Division.