

**Final Determination**  
Georgia Power Company  
Expansion of the Wansley Steam-Electric Generating Plant  
located in Heard County, Georgia

On November 30, 1999, Georgia Power Corporation (Georgia Power) submitted to the Environmental Protection Division (EPD) an application for an air quality permit to construct and operate a combined-cycle facility at the Wansley Steam-Electric Generating Plant in Heard County, Georgia. On May 26, 2000, EPD issued a Preliminary Determination stating that the construction and operation of the combined-cycle facility should be approved. The Preliminary Determination contained a draft Air Quality Permit for the construction and operation of the combined-cycle facility.

The Division requested that Georgia Power place a public notice in a newspaper of general circulation in the area of the proposed facility notifying the public of the proposed construction and providing the opportunity for written public comment and public hearing. Such public notice was placed in the *Atlanta Journal-Constitution* and the *Franklin News and Banner* on May 31, 2000. The public comment period expired July 12, 2000. A public hearing and public meeting on the proposed combined-cycle facility at Plant Wansley was held in Newnan, Georgia on July 10, 2000.

During the comment period, comments were received from Georgia Power, the U.S. EPA, and from members of the public. A discussion of the opinions/concerns of the public are included with this Final Determination in Appendix A. The proposed changes to the draft Air Quality Permit will not significantly change the emission limits or compliance strategy of the Permit. The requested changes are listed below along with the changes made to the final Permit. A copy of the final permit is provided in Appendix B.

Georgia Power's Comments on the Proposed Permit

1. Condition 3.1

Georgia Power requests that the phrase "DLN Burner" be changed to "Low NOx Burner."

**Response:** EPD has no problem with this administrative change.

2. Condition Nos. 3.3.5, 3.3.6, and 3.3.7

Each of these conditions define the date that construction be completed on Phases I, II, and III. Georgia Power requests that these dates be September 1, 2002 (Phase I), September 1, 2004 (Phase II), and September 1, 2005 (Phase III) rather than June 1 of the respective years.

**Response:** Georgia Power noted in the permit application that they anticipate that commercial operation of these phases will begin mid-year of the years noted above. Now Georgia Power requests that the completion of construction and commercial operation start-up be September 1 of these years in order to allow for any unforeseen construction issues. EPD agrees to this change.

3. Condition Nos. 3.3.11, 3.3.12, 3.3.14, and 3.3.15

The legal authority for each of these conditions indicates that the requirements of PSD subsume the requirements of the remaining applicable state and federal requirements. Georgia Power clarified that compliance with any subsumed limit must be evaluated by appropriate performance testing methodologies, available data and the subsumed limit itself, according to the EPA White Paper No. 2, issued March 1996.

**Response:** The proposed combined-cycle facility is subject to overlapping applicable requirements governing the same emission units. As a result, some of the emission units are subject to parallel sets of

requirements. The result, in this case, is that some of the requirements are redundant and unnecessary as a practical matter, even though the requirements still legally apply to the source. The proposed permit “streamlines” multiple overlapping requirements into one set that will assure compliance with all applicable requirements. Compliance with the streamlined requirement will be deemed compliance with the listed requirement. EPD agrees that excursions of the most stringent limit are not necessarily indicative of noncompliance with the subsumed limits. EPD has removed the New Source Performance Standard (NSPS) citations from Condition Nos. 5.2.14f and 5.2.14h.

4. Condition 3.3.14

Condition 3.3.14 proposes an operational restriction on the new turbines to not operate below 127.50 MW, except during periods of startup or shutdown for purposes of PSD. Georgia Power requests that this operational restriction be set at 85 MW which reflects fifty percent (50) percent load. They state that the proposed BACT emission levels and BACT assumes operation of the turbines at 50% load.

**Response:** Emissions of CO and total organic compounds are dependant upon temperature in the turbine combustion chamber and typically increase as the temperature decreases. Additionally, the combustion temperature for a given turbine load is also very consistent and only decreases with a decrease in turbine load. Seventy-five (75) percent load was chosen as the minimum permitted operating level (Note that 75 percent of base load is approximately 170 MW (each CT)\*0.75 equals 127.5 MW). Upon further review of application number 11857, EPD agrees to revising Condition 3.3.14 to reflect 85 MW as long as the required performance testing shows compliance with the applicable emission limits at 50% load.

5. Condition 3.3.15

Condition 3.3.15 proposes a NOx BACT of 3.5 ppmvd, corrected to 15% oxygen, during any thirty (30) day rolling average. Georgia Power requests a NOx BACT of 0.013 lb/MMBtu.

**Response:** EPD is not inclined to set the NOx BACT limit in “lb/MMBtu”, in part, because allowable NOx emission limits for turbines and IC generators is defined in ppm in the Georgia Rules for Air Quality and in the New Source Performance Standards.

6. Condition 3.3.21

Georgia Power requests that the phrase “dry low NOx burners” be revised to read “low NOx burners.”

**Response:** EPD agrees to the change.

7. Condition Nos. 3.4.8 and 3.4.9

Georgia Power requests that the phrase “commences operation” be put in quotation marks.

**Response:** EPD does not believe this editorial change is necessary.

8. Condition 4.1.3

Georgia Power requests that Method 7 or 7E be included as an alternative method for determination of NOx from the CT/HRSG combined stack.

**Response:** Method 20 is proposed as the applicable test method to determine NOx emissions from combustion turbines, in accordance with NSPS GG [40 CFR 60.335(c)(3)]. EPD cannot include Method 7 or 7E as an alternative method until EPA comes out with rulemaking on this issue.

9. Condition 4.2.2c  
Georgia Power requests that the reference to “75 percent load” be revised to state “50 percent load.”

**Response:** EPD agrees to this change based on comment 4 above.

10. Condition Nos. 4.2.2g - 1  
Condition Nos. 4.2.2g-1 require on-site testing of seven different HAP emissions. Georgia Power requests that these conditions include language which allows the submittal of HAP emission test results for a similar unit at base load if such data becomes available before the testing deadline in Condition 4.2.2.

**Response:** EPD agrees to add language in Condition 4.2.2 that allows for Division approved HAP emission test results for a similar unit at base load to be used in lieu of on-site testing.

11. Condition 4.2.3  
Georgia Power requests that the sentence “A separate performance test is completed at the end of each operating day after the initial performance test” , with “After the initial performance test is completed, NOx emission limit compliance determinations for each affected unit will be completed at the end of each operating day.”

**Response:** The language in Condition 4.2.3 comes directly from 40 CFR 60 Subpart Da[40 CFR 60.46a(e) and (f)] which requires “a separate performance test” at the end of each operating day. EPD believes, in this case, that only EPA can alter this requirement. Thus, no change to this condition is proposed.

12. Condition 5.2.1c  
Georgia Power requests that the phrase “each combustion turbine” be revised to read “in the respective emission units.”

**Response:** EPD agrees to this change.

13. Condition 5.2.14g  
Georgia Power requests that the reference to “127.50 MW” be revised to “85 MW.”

**Response:** EPD agrees to this change based on item 4 above.

14. Condition 5.3.8  
Georgia Power requests that the reference to “six months” in a quarter be corrected to say “three months” in a quarter.

**Response:** EPD agrees to this change.

15. Request for Inclusion of an Additional Condition  
Georgia Power requests that a startup, shutdown and malfunction excess emission provision be included in the permit to reflect the requirements of 40 CFR 60.8. They voiced concern that by requesting that emission limits be streamlined, they did not intend to preclude the use of applicable startup, shutdown and malfunction provisions.

**Response:** 40 CFR 60.8(c) states, "... Operations during periods of startup, shutdown, and malfunction shall not constitute representative conditions for the purpose of a performance test nor shall emissions in excess of the level of the applicable emission limit during periods of startup, shutdown, and malfunction be considered a violation of the applicable emission limit unless otherwise specified in the applicable standard." The NSPS General Provisions continue,

"At all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source."

Terms of exclusion of startup, shutdown, and malfunction (SSM) are provided in Condition Nos. 8.13.1 and 8.17.1. EPD is not inclined to elaborate any further on SSM in the permit.

#### Georgia Power's Comments on the Preliminary Determination

16. Summary Page

Georgia Power states that the potential VOC emissions listed at 322.37 tons per year should be listed as 595.7 tpy.

**Response:** EPD agrees that the inclusion of "322.37" is a typographical error and the correct potential VOC emission rate from the new combined-cycle facility is 595.7 tpy.

17. Page 3, First Paragraph

Georgia Power objects to EPD's conclusion that potential NOx emissions proposed were not based on the highest hourly emission rate for the turbine and duct burner.

**Response:** While that was EPD's initial observation, upon further review, EPD agrees with Georgia Power. EPD believes that the potential NOx emission rate of 1040.7 tpy is based on the highest hourly NOx emission rate for the turbine and duct burner, combined.

18. Page 7, Second Paragraph

Georgia Power noted a typographical error as it relates to stating the allowable NSPS Subpart GG NOx emission limit.

**Response:** EPD agrees that the allowable NSPS Subpart GG NOx emission limit is 108 ppmvd at 15% oxygen and not 75 ppmvd at 15% oxygen as noted.

19. Page 11, Third Paragraph

Georgia Power voiced concern that EPD stated that “The typical weight percent sulfur content of very low sulfur distillate fuel oil is less than 0.05.” They request deletion of this sentence.

**Response:** EPD believes that the sentence in question is correct and does not mislead the reader. Hence, this sentence is not deleted.

20. Page 14, First Paragraph

Georgia Power disagrees with EPD’s position that the uncontrolled CO emission rate of 138 lb/hr should have been used for the BACT economic analysis instead of the weighted average uncontrolled CO emission rate of 94 lb/hr. The weighted average uncontrolled emission rate of 94 lb/hr represents a realistic worst case operation mode of 1,000 hours using power augmentation and the remaining 7,760 hours per year at the highest emission rate mode without power augmentation.

**Response:** EPD stands behind its statement that the CO BACT economic analysis should have considered 138 lb/hr instead of 94 lb/hr. EPD bases this belief on the fact that Georgia Power requested a CO BACT emission limit of 138 lb/hr in Table 1-2 of their permit application.

21. Page 14, Conclusions

Georgia Power notes a typographical error in that “29.5” should read as “27.2”

**Response:** EPD stands behind the CO BACT limit of 29.5 ppm @ 15% oxygen because Georgia Power requested such a CO BACT emission limit in Table 1-2 of their permit application.

22. Page 15, First Table

Georgia Power noted that EPD incorrectly cited the allowable PM emission limit established by NSPS Subpart Da.

**Response:** EPD agrees that this the allowable PM emission limit established by NSPS Subpart Da should have read as 0.03 lb/MMBtu and not 0.013 lb/MMBtu.

23. Page 16, Third Column

Georgia Power notes that the BACT NOx emission limit should be 0.013 lb/MMBtu and that the BACT CO emission limit should be 0.061 lb/MMBtu.

**Response:** EPD only agrees to correct the CO BACT emission limit to 0.061 lb/MMBtu. No change is proposed to the NOx BACT emission limit units of ppmvd at 15% oxygen.

24. Page 21, Item 4

Georgia Power requests that the reference to “75” be revised to “50.”

**Response:** EPD agrees to this change as a result of comment 4, noted above.

25. Page 25, Next to Last Paragraph

Georgia Power noted that the proposed stack height for the combustion turbines is 132 feet, not 131 feet, and the plant base elevation is approximately 727 feet, not 755 feet.

**Response:** EPD agrees to these changes as they were noted as proposed by Georgia Power in the permit application.

26. Page 29, First Paragraph under Growth

Georgia Power disagrees with EPD's statement that "The proposed project will be operated remotely."

**Response:** EPD has no problem revising the discussion of "Growth" to not include this statement.

27. Page 33, First Paragraph

Georgia Power requests that the reference to "75% load" be revised to "50% load."

**Response:** EPD agrees to this change as a result of comment 4, noted above.

EPA Region IV's Comments

28. Condition 3.3.15

Condition 2.2a defines the NOx BACT emission limit, and EPA voiced concern that the proposed averaging period for assessing NOx emissions compliance is a 30-day rolling average. EPA considers this as an unusually long averaging period for compliance purposes, especially in light of the fact that Condition 4.2.3 of the draft permit allows emissions during startups and shutdowns to be excluded from compliance calculations.

**Response:** EPD set the averaging period for assessing NOx emissions compliance on a 30-day rolling average because EPD believes that vendor guarantees for turbine and duct burner performance do not always equate to reliable, long-term operating performance, especially when the new equipment has never before been operated. This, in addition, to the "very" low proposed NOx limit, led EPD to consider an averaging period greater than one hour. Lastly, EPD is aware that EPA has defined the NSPS Subpart Da NOx limit with an averaging period of "30 steam generating unit operating days." With these facts in mind, EPD believes that it is appropriate to define the averaging period for assessing NOx emissions compliance on a 30-day rolling average.

EPD understands EPA's concerns; however, EPD excluded emissions during startup and shutdown because NSPS GG and NSPS Da exclude emissions during these operational times. With this in mind, EPD does not propose to remove this exclusion; however, EPD will review this approach on a case-by-case basis for future air quality permits.

29. Page 4-13 of the Permit Application

Page 4-13 of the permit application contains the following statement: "It is also evident from discussions with certain Region IV states that the current threshold for BACT in determining required technologies is set at \$5000 per ton of pollutant removed or greater." EPA seeks concurrence from EPD that EPD did not base its BACT determination on this statement.

**Response:** EPD concurs with EPA. EPD has not established \$5000 per ton of pollutant removed or greater as the cutoff in making a BACT cost-effectiveness study.

30. Page 14 of the Preliminary Determination

EPA voiced concern that EPD did not consider catalytic oxidation as BACT because EPA Region IV has not required this control option as BACT.

**Response:** EPD is not inclined to require catalytic oxidation as BACT in this case because it is not cost effective.

31. Page 19 of the Preliminary Determination

Page 19 of the Preliminary Determination refers to EPA's interpretative ruling on Section 112(g) applicability for combustion turbines. The reference cites the *Federal Register* of April 21, 2000 (65 FR 21363). EPA noted that the interpretative ruling published on April 21, 2000 was subsequently replaced by a corrected ruling.

**Response:** EPD so notes the revised interpretative ruling date. No conclusions as to 112(g) applicability are changed as a result of this new interpretative ruling.

EPA Modeling questions are addressed in Appendix C of this Final Determination.

MODIFIED PERMIT CONDITIONS  
 PERMIT NO. 4911-149-0001-V-01-2  
 EXPANSION AT PLANT WANSLEY

**PART 3.0 REQUIREMENTS FOR EMISSION UNITS**

**Note:** Except where an applicable requirement specifically states otherwise, the averaging times of any of the Emissions Limitations or Standards included in this permit are tied to or based on the run time(s) specified for the applicable reference test method(s) or procedures required for demonstrating compliance.

3.1 Emission Units

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements / Standards	Corresponding Permit Conditions	ID No.	Description
SG01	Steam Generator Unit 1	391-3-1-.02(2)(b), (d), (g), and Acid Rain	3.2.1, 3.2.2, 3.4.1, 3.4.2, 3.4.3, Section 7.9	EP01 SCR1	ESP SCR
SG02	Steam Generator Unit 2	391-3-1-.02(2)(b), (d), (g), and Acid Rain	See SG01	EP02 SCR2	ESP SCR
CT5A	Combustion Turbine Unit 5A	40 CFR 60 Subpart GG and 391-3-1-.02(2)(b) and (g)	3.2.3, 3.2.5, 3.3.1, 3.3.2, 3.3.3	W15 A	Water Injection
SB01	Start-up Boiler Unit 1	391-3-1-.02(2)(b), (d), and (g)	3.2.4, 3.4.2, 3.4.3, 3.4.4	none	n/a
SB02	Start-up Boiler Unit 2	391-3-1-.02(2)(b), (d), and (g)	See SB01	none	n/a
CHS	Coal Handling System	391-3-1-.02(2)(n)	3.4.5, 3.4.6	none	n/a
AHS	Ash Handling System	391-3-1-.02(2)(n)	See CHS	none	n/a
CT6A	Combustion Turbine Unit 6A	40 CFR 60 Subpart GG 40 CFR 52.21 391-3-1-.02(2)(b) and (g) Acid Rain	3.3.4, 3.3.5, 3.3.8, 3.3.10, 3.3.11, 3.3.13-3.3.20, 3.3.22, 3.4.7, 4.2.2, 4.2.3, 5.2.1, 5.2.7-5.2.10, 5.2.12-5.2.14, 5.3.7, 5.3.8, 6.2.4, 6.2.6-6.2.10	LC6A SC6A	<del>DLN Burner</del> <b>Low NOx Burner</b> SCR

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements / Standards	Corresponding Permit Conditions	ID No.	Description
DB6 A	HRSG, for combustion turbine CT6A, supplementary fired by Duct Burner Unit 6A.	40 CFR 60 Subpart Da 40 CFR 52.21 391-3-1-.02(2)(b) and (g) Acid Rain	3.3.4, 3.3.5, 3.3.10, 3.3.12, 3.3.13, 3.3.15- 3.3.19, 3.3.21, 3.3.22, 3.4.7, 4.2.2, 4.2.3, 5.2.1, 5.2.7-5.2.9, 5.2.11, 5.3.7, 5.3.8, 6.2.4- 6.2.10	LD6 A SC6A	<del>DLN Burner</del> <b>Low NOx Burner SCR</b>
CT6B	Combustion Turbine Unit 6B	40 CFR 60 Subpart GG 40 CFR 52.21 391-3-1-.02(2)(b) and (g) Acid Rain	Same as CT6A	LC6B SC6B	<del>DLN Burner</del> <b>Low NOx Burner SCR</b>
DB6B	HRSG, for combustion turbine CT6B, supplementary fired by Duct Burner Unit 6B.	40 CFR 60 Subpart Da 40 CFR 52.21 391-3-1-.02(2)(b) and (g) Acid Rain	Same as DB6A	LD6B SC6B	<del>DLN Burner</del> <b>Low NOx Burner SCR</b>
CT7A	Combustion Turbine Unit 7A	40 CFR 60 Subpart GG 40 CFR 52.21 391-3-1-.02(2)(b) and (g) Acid Rain	Same as CT6A	LC7A SC7A	<del>DLN Burner</del> <b>Low NOx Burner SCR</b>
DB7 A	HRSG, for combustion turbine CT7A, supplementary fired by Duct Burner Unit 7A.	40 CFR 60 Subpart Da 40 CFR 52.21 391-3-1-.02(2)(b) and (g) Acid Rain	Same as DB6A	LD7 A SC7A	<del>DLN Burner</del> <b>Low NOx Burner SCR</b>
CT7B	Combustion Turbine Unit 7B	40 CFR 60 Subpart GG 40 CFR 52.21 391-3-1-.02(2)(b) and (g) Acid Rain	Same as CT6A	LC7B SC7B	<del>DLN Burner</del> <b>Low NOx Burner SCR</b>
DB7B	HRSG, for combustion turbine CT7B, supplementary fired by Duct Burner Unit 7B.	40 CFR 60 Subpart Da 40 CFR 52.21 391-3-1-.02(2)(b) and (g) Acid Rain	Same as DB6A	LD7B SC7B	<del>DLN Burner</del> <b>Low NOx Burner SCR</b>
CT8A	Combustion Turbine Unit 8A	40 CFR 60 Subpart GG 40 CFR 52.21 391-3-1-.02(2)(b) and (g) Acid Rain	3.3.4, 3.3.6, 3.3.8, 3.3.10, 3.3.11, 3.3.13-3.3.20, 3.3.22, 3.4.8, 4.2.2, 4.2.3, 5.2.1, 5.2.7-5.2.10, 5.2.12-5.2.14, 5.3.7, 5.3.8, 6.2.4, 6.2.6-6.2.10	LC8A SC8A	<del>DLN Burner</del> <b>Low NOx Burner SCR</b>

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements / Standards	Corresponding Permit Conditions	ID No.	Description
DB8 A	HRSG, for combustion turbine CT8A, supplementary fired by Duct Burner Unit 8A.	40 CFR 60 Subpart Da 40 CFR 52.21 391-3-1-.02(2)(b) and (g) Acid Rain	3.3.4, 3.3.6, 3.3.8, 3.3.10, 3.3.12-3.3.19, 3.3.21, 3.3.22, 3.4.8, 4.2.2, 4.2.3, 5.2.1, 5.2.7-5.2.9, 5.2.11, 5.3.7, 5.3.8, 6.2.4-6.2.10	LD8 A SC8A	<del>DLN Burner</del> <b>Low NOx Burner</b> SCR
CT8B	Combustion Turbine Unit 8B	40 CFR 60 Subpart GG 40 CFR 52.21 391-3-1-.02(2)(b) and (g) Acid Rain	Same as CT8A	LC8B SC8B	<del>DLN Burner</del> <b>Low NOx Burner</b> SCR
DB8B	HRSG, for combustion turbine CT8B, supplementary fired by Duct Burner Unit 8B.	40 CFR 60 Subpart Da 40 CFR 52.21 391-3-1-.02(2)(b) and (g) Acid Rain	Same as DB8A	LD8B SC8B	<del>DLN Burner</del> <b>Low NOx Burner</b> SCR
CT9A	Combustion Turbine Unit 9A	40 CFR 60 Subpart GG 40 CFR 52.21 391-3-1-.02(2)(b) and (g) Acid Rain	3.3.4, 3.3.6, 3.3.9, 3.3.10, 3.3.11, 3.3.13-3.3.20, 3.3.22, 3.4.9, 4.2.2, 4.2.3, 5.2.1, 5.2.7-5.2.10, 5.2.12-5.2.14, 5.3.7, 5.3.8, 6.2.4, 6.2.6-6.2.10	LC9A SC9A	<del>DLN Burner</del> <b>Low NOx Burner</b> SCR
DB9 A	HRSG, for combustion turbine CT9A, supplementary fired by Duct Burner Unit 9A.	40 CFR 60 Subpart Da 40 CFR 52.21 391-3-1-.02(2)(b) and (g) Acid Rain	3.3.4, 3.3.7, 3.3.9, 3.3.10, 3.3.12-3.3.19, 3.3.21, 3.4.9, 4.2.2, 4.2.3, 5.2.1, 5.2.7-5.2.9, 5.2.11, 5.3.7, 5.3.8, 6.2.4-6.2.10	LD9 A SC9A	<del>DLN Burner</del> <b>Low NOx Burner</b> SCR
CT9B	Combustion Turbine Unit 9B	40 CFR 60 Subpart GG 40 CFR 52.21 391-3-1-.02(2)(b) and (g) Acid Rain	Same as CT9A	LC9B SC9B	<del>DLN Burner</del> <b>Low NOx Burner</b> SCR
DB9B	HRSG, for combustion turbine CT9B, supplementary fired by Duct Burner Unit 9B.	40 CFR 60 Subpart Da 40 CFR 52.21 391-3-1-.02(2)(b) and (g) Acid Rain	Same as DB9A	LD9B SC9B	<del>DLN Burner</del> <b>Low NOx Burner</b> SCR

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

### 3.3

#### Equipment Federal Rule Standards

- 3.3.5 The construction of Phase I (source codes CT6A, DB6A, CT6B, DB6B, CT7A, DB7A, CT7B, and DB7B) shall be completed by no later than **September 1, 2002** ~~June 1, 2002~~. In the event that construction of any of these units is not completed by the date specified, and absent approval by the Division for an extension of the completion date, this Permit shall become null and void with respect to that unit and all units yet to be constructed. The Permit will remain in full force and effect with regard to any units for which construction has been completed by the applicable construction deadline. [40 CFR 52.21(r)(2)]
- 3.3.6 The construction of Phase II (source codes CT8A, DB8A, CT8B, and DB8B) shall be completed by no later than **September 1, 2004** ~~June 1, 2004~~. In the event that construction of any of these units is not completed by the date specified, and absent approval by the Division for an extension of the completion date, this Permit shall become null and void with respect to that unit and all units yet to be constructed. The Permit will remain in full force and effect with regard to any units for which construction has been completed by the applicable construction deadline. [40 CFR 52.21(r)(2)]
- 3.3.7 The construction of Phase III (source codes CT9A, DB9A, CT9B, and DB9B) shall be completed by no later than **September 1, 2005** ~~June 1, 2005~~. In the event that construction of any of these units is not completed by the date specified, and absent approval by the Division for an extension of the completion date, this Permit shall become null and void with respect to that unit and all units yet to be constructed. The Permit will remain in full force and effect with regard to any units for which construction has been completed by the applicable construction deadline. [40 CFR 52.21(r)(2)]
- 3.3.14 The Permittee shall not operate the combustion turbines (CT6A, CT6B, CT7A, CT7B, CT8A, CT8B, CT9A, and CT9B) below **85 MW** ~~127.50 MW~~, except during periods of startup or shutdown. [40 CFR 52.21(j)]
- 3.3.21 The Permittee shall install and operate, as BACT for NO<sub>x</sub> on each duct burner in HRSGs DB6A, DB6B, DB7A, DB7B, DB8A, DB8B, DB9A, and DB9B, ~~dry~~ low NO<sub>x</sub> burners for natural gas combustion. [40 CFR 52.21(j)]

## **PART 4.0 REQUIREMENTS FOR TESTING**

### 4.2 Specific Testing Requirements

4.2.2 Within 60 days after achieving the maximum production rate at which each affected facility will be operated, but not later than 180 days after the initial startup of each affected facility, the Permittee shall conduct the following performance tests and furnish to the Division a written report of the results of such performance tests:

- c. Performance tests on two affected facilities that are part of Phase I, (CT6A/DB6A, CT6B/DB6B, CT7A/DB7A, and CT7B/DB7B), for CO at base load and at **50 percent load** ~~75 percent load~~.  
[40 CFR 52.21 and 391-3-1-.02(6)(b)1.(i)]

**4.2.4 The Permittee may submit emission tests results for air pollutants noted in Condition Nos. 4.2.2g through 4.2.2l for a similar unit at base load if such data becomes available before the testing deadline noted in Condition 4.2.2. Such emission test results may only be used to comply with the applicable testing requirements noted in Condition Nos. 4.2.2g through 4.2.2l upon written approval by the Division.**

## **PART 5.0 REQUIREMENTS FOR MONITORING (and Related Record Keeping and Reporting)**

### 5.2 Specific Monitoring Requirements

#### 5.2.1 Individual Equipment

The Permittee shall install, calibrate, maintain, and operate continuous monitoring systems for the measurement of the following pollutants or parameters on the following equipment. Each system shall meet the applicable performance specification(s) of the Division's monitoring requirements.

- c. Monitoring systems to monitor and record the fuel consumption being fired in ~~each combustion turbine~~ ~~( the emission unit ID numbers CT6A, CT6B, CT7A, CT7B, CT8A, CT8B, CT9A, and CT9B)~~ and in each duct burner (emission unit ID DB6A, DB6B, DB7A, DB7B, DB8A, DB8B, DB9A, and DB9B).  
[40 CFR 52.21; 391-3-1-.02(6)(b)1.; 40 CFR 70.6(a)(3)(i), and 40 CFR 60.334(a) for combustion turbines (subsumed)]

5.2.14 For the purposes of reporting deviations and/or excess emissions as required by Condition 5.3.1, deviations and/or excess emissions are:

f. Any thirty (30) day rolling average NO<sub>x</sub> emission rate which exceeds 3.5 ppmvd, corrected to 15 percent oxygen, from each of the affected facilities noted in Condition 3.3.10.

[40 CFR 70.6(a)(3)(iii)(A) and ~~40 CFR 60.334(c)(1) for combustion turbines (subsumed)~~]

g. Any hour period during which the average megawatt output of a turbine (CT6A, CT6B, CT7A, CT7B, CT8A, CT8B, CT9A, and CT9B) is less than **85 MW** ~~127.50 MW~~. For the purpose of this condition, a one-hour period means any 60-minute period commencing on the hour.

[40 CFR 70.6(a)(3)(iii)(A)]

h. Any semiannual analysis of the natural gas fired in ~~any turbine~~ **(turbines with emission unit ID numbers CT6A, CT6B, CT7A, CT7B, CT8A, CT8B, CT9A, and CT9B)** whose sulfur content exceeds 0.01 weight percent.

[40 CFR 70.6(a)(3)(iii)(A); and ~~40 CFR 60.334(c)(2)(subsumed)~~]

### 5.3 Record Keeping and Reporting Requirements

5.3.8 The Permittee shall submit reports of the nitrogen oxides emissions from each of the combustion turbine and duct burner combined stacks specified in Condition 3.3.10 for each calendar quarter (quarters ending March 31, June 30, September 30, and December 31). The reports shall be postmarked by the 30th day following the end of each quarter, April 30, July 30, October 30, and January 30, respectively. The reports shall contain the total 12-consecutive month total nitrogen oxides emissions for each of the ~~six~~ **three** months in the quarter. A 12-consecutive month total shall be the total for a month in the reporting period plus the totals for the previous eleven consecutive months. The reports shall be prepared from the records retained in Condition 5.2.9.

[40 CFR 52.21, 391-3-1-.02(6)(b)1(i), and 40 CFR 70.6(a)(3)(i)]

**APPENDIX A**

**Memorandum on Public Hearing/Public Meeting on July 10, 2000  
in Newnan, Coweta County, Georgia**

**APPENDIX B**

**FINAL PSD/TITLE V PERMIT FOR EXPANSION AT PLANT WANSLEY**

**APPENDIX C**

**EPD RESPONSE TO EPA MODELING QUESTIONS**