

Facility Name: Hartsfield – Jackson Atlanta International Airport
 City: Atlanta
 County: Clayton
 AIRS #: 04-13-063-00030

Application #: TV-14165
 Date Application Received: December 9, 2002
 Permit No: 4581-063-0030-V-02-0

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Introduction

This narrative is being provided to assist the reader in understanding the content of the attached draft Part 70 operating permit. Complex issues and unusual items are explained herein simpler terms and/or greater detail than is sometimes possible in the actual permit. This permit is being issued pursuant to: (1) Georgia Air Quality Act, O.C.G.A § 12-9-1, et seq. and (2) Georgia Rules for Air Quality Control, Chapter 391-3-1, and (3) Title V of the Clean Air Act. Section 391-3-1-.03(10) of the Georgia Rules for Air Quality Control incorporates requirements of Part 70 of Title 40 of the Code of Federal Regulations promulgated pursuant to the Federal Clean Air Act. The primary purpose of this permit is to consolidate and identify existing state and federal air requirements applicable to **Hartsfield – Jackson Atlanta International Airport** and to provide practical methods for determining compliance with these requirements. The following narrative is designed to accompany the draft permit and is presented in the same general order as the permit. It initially describes the facility receiving the permit, the applicable requirements and their significance, and the methods for determining compliance with those applicable requirements. This narrative is intended as an adjunct for the reviewer and to provide information only. It has no legal standing. Any revisions made to the permit in response to comments received during the public participation and EPA review process will be described in an addendum to this narrative.

I. Facility Description**A. Facility Identification**

1. Facility Name:

Hartsfield – Jackson Atlanta International Airport (HJAIA)

2. Parent/Holding Company Name

City of Atlanta

3. Previous and/or Other Name(s)

This site could also be known as “Hartsfield Airport,” “Atlanta Airport,” or “Department of Aviation.”

4. Facility Location

Department of Aviation
P.O. Box 20509, Atrium Suite 430
Atlanta, Georgia 30320 (Clayton County)

Directions: From I-75 South, take the ramp to I-285 West (Birmingham). At Riverdale Road exit, turn right and go approximately 1-1/4 miles and turn right into the airport just past the third set of traffic signal lights. Park in either the North or South Parking Lot System and come to the Department of Aviation offices in the Terminal Atrium which is located between the North and South Terminals, and between baggage claim and ticketing. Offices are on the top (4th) floor, directly above the clock tower.

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

The facility is located in the Atlanta ozone non-attainment area.

6. Class I Area Impacts

HJAIA is located within 200 km of a Class I area.

B. Site Determination

The City of Atlanta owns the Hartsfield – Jackson International Airport (HJAIA), all of which is located on contiguous property. Most of HJAIA is located in Clayton County, however, some of it is located in Fulton County. The City leases property to many other parties who may or may not operate stationary sources of air pollution. Some of the large airlines which operate at HJAIA conduct their own airplane maintenance on site. Since the City of Atlanta does not control the operations of these airlines, it has been deemed that the stationary sources of air pollution operated by these airlines are not part of the same Part 70 site as the stationary sources of air pollution operated by the City of Atlanta. It is believed that this Permit contains all the significant sources that are under the control of the City of Atlanta.

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
4581-063-0030-V-01-0	June 8, 1998	Initial Title V Permit
4581-063-0030-V-01-1	November 12, 2003	502(b)(10) change for the addition of three new boilers

D. Process Description

1. SIC Codes(s) - 4581
2. Description of Product(s)

This facility does not make a “product.” Its function is to operate and maintain the facilities at Hartsfield – Jackson Atlanta International Airport.

3. Overall Facility Process Description

This facility operates fuel burning equipment which is used primarily for space heating at the terminals. They also operate and maintain stationary engines which are used to generate electricity if power is lost from the electric utility.

4. Overall Process Flow Diagram

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

E. Regulatory Status

1. PSD/NSR

HJAIA is a major source for purposes of nonattainment New Source Review (NSR) because it has the potential to emit more than 25 tpy of NO_x in the Atlanta ozone nonattainment area. It is also a major source under the PSD regulations because it is one of the 28 named source categories under PSD (fossil fuel-fired boilers with total heat input capacity greater than 250 MMBtu/hr) and potential emissions are greater than 100 tpy for SO₂. HJAIA became one of the 28 named source categories when they added the fuel burning equipment sources at Concourse E in 1993.

The potential NO_x emissions from all the equipment that preceded the Concourse E expansion was greater than 50 tpy making the airport an existing major source at the time of the Concourse E expansion in 1993. The potential NO_x emissions from the equipment that was installed as part of the Concourse E expansion were limited below 25 tpy so the expansion would not be subject to NAA/NSR. Since this was an NSR avoidance condition, the potential NO_x emissions from the Concourse E expansion will never be allowed to exceed 25 tpy. The NAA/NSR Avoidance window is 1993-1998.

The pre-Concourse E equipment was a major source under PSD because it had the potential to emit more than 250 tpy of SO₂. To avoid subjection to PSD, the potential SO₂ emissions from the Concourse E expansion were limited below 40 tpy by limiting the amount of fuel oil that may be burned in the boilers. The limit was set low enough so that EPD did not have to consider limiting SO₂ emissions from the IC engines.

The boiler replacement project for the new terminal boilers does not trigger PSD for the attainment (criteria) air pollutants because the permit will restrict fuel oil usage to maintain potential SO₂ emissions below 40 tpy. The project does not trigger NAA/NSR for NO_x emissions because the permit will restrict NO_x emissions below 25 tpy.

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			✓
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

This facility is not major for HAPs. It is not subject to any proposed or final MACT Standards. This facility could be subject to a future MACT standard for combustion sources if area sources are covered by the rule.

4. Program Applicability (AIRS Program Codes)

Program Code	Applicable (y/n)
Program Code 6 - PSD	No
Program Code 8 – Part 61 NESHAP	No
Program Code 9 - NSPS	Yes
Program Code M – Part 63 NESHAP	No
Program Code V – Title V	Yes

Regulatory Analysis

II. Facility Wide Requirements

A. Emission and Operating Caps:

None applicable.

B. Applicable Rules and Regulations

Applicable facility-wide rules and regulations specified in Permit No. 4581-063-0030-V-01-0 are discussed in the initial Title V permit narrative for this facility. Please refer to this narrative.

Georgia Rule 391-3-1-.03(8)(c)13(ii) applies to this facility because potential NO_x emission equal or exceed 25 tpy. This rule limits the net emissions increase of NO_x and VOC emissions, each, to 25 tons over five consecutive calendar years.

C. Compliance Status

The facility is operating in compliance with their air quality permit.

D. Operational Flexibility

The applicant has not requested the inclusion of conditions implementing operational flexibility.

E. Permit Conditions

Condition 2.21 states that HJAIA is subject to the NSPS General Provisions.

Condition 2.3.1 was added which specifies an existing facility-wide requirement in accordance with Georgia Rule 391-3-1-.03(8)(c)13(ii), namely that the facility-wide net emissions increase of VOC and NO_x may not exceed 25 tons for each pollutant over five consecutive calendar years.

Condition 2.4.1 requires HJAIA to obtain written approval from the Division before they operate any additional emission units whose potential to emit of NO_x exceeds 1.0 tpy. This will ensure that an additional emission unit will be in compliance with Georgia Rule (yy) before it is installed.

III. Regulated Equipment Requirements

A. Brief Process Description

Initial Title V Permit

A brief process description is specified in the narrative for Title V Permit No. 4581-063-0030-V-01-0. Please refer to this narrative.

Modifications and Amendments

On November 12, 2003 the facility received Amendment No. 4581-063-0030-V-01-1 for the construction and operation of three boilers (SB04, SB05, and SB06) as replacements for boilers SB01, SB02, and SB03. The new boilers are to be dual fueled, namely natural gas and fuel oil (Jet A) fired. Boiler SB04 is rated at 60.5 MMBtu/hr for natural gas combustion and 57.2 MMBtu/hr for fuel oil combustion. Boilers SB05 and SB06 are rated at 47.1 MMBtu/hr for natural gas combustion and 44.5 MMBtu/hr for fuel oil combustion. These boilers will incorporate the use of ultra-low NO_x burners during natural gas combustion in order to comply with Georgia Rule (III) without the use of add-on control equipment.

B. Equipment List for the Process

Emission Units		Specific Limitations/Requirements		
ID No.	Description	Applicable Requirements/Standards	APCD* ID No.	Equipment Group
SB04	Boiler	391-3-1-.02(2)(d) 391-3-1-.02(2)(g) 391-3-1-.02(2)(III) 40 CFR 60 Subpart Dc NAA/NSR Avoidance for NO _x PSD Avoidance for SO ₂	None	SB00
SB05	Boiler	391-3-1-.02(2)(d) 391-3-1-.02(2)(g) 391-3-1-.02(2)(III) 40 CFR 60 Subpart Dc NAA/NSR Avoidance for NO _x PSD Avoidance for SO ₂	None	SB00
SB06	Boiler	391-3-1-.02(2)(d) 391-3-1-.02(2)(g) 391-3-1-.02(2)(III) 40 CFR 60 Subpart Dc NAA/NSR Avoidance for NO _x PSD Avoidance for SO ₂	None	SB00

Emission Units		Specific Limitations/Requirements		
ID No.	Description	Applicable Requirements/Standards	APCD* ID No.	Equipment Group
B001	Concourse E Boiler #1	40 CFR 60 Subpart Dc, 391-3-1-.02(2)(d), (g), and (yy), NSR Avoidance, PSD Avoidance	None	B000
B002	Concourse E Boiler #2	40 CFR 60 Subpart Dc, 391-3-1-.02(2)(d), (g), and (yy), NSR Avoidance, PSD Avoidance	None	B000
B003	Concourse E Boiler #3	40 CFR 60 Subpart Dc, 391-3-1-.02(2)(d), (g), and (yy), NSR Avoidance, PSD Avoidance	None	B000
PSG1	Peak Shaving Gen. 1	391-3-1-.02(2)(b), (g), and (mmm), NSR Avoidance	None	PSG0
PSG2	Peak Shaving Gen. 2	391-3-1-.02(2)(b), (g), and (mmm), NSR Avoidance	None	PSG0
PSG3	Peak Shaving Gen. 3	391-3-1-.02(2)(b), (g), and (mmm), NSR Avoidance	None	PSG0
PSG4	Peak Shaving Gen. 4	391-3-1-.02(2)(b), (g), and (mmm), NSR Avoidance	None	PSG0
PSG5	Peak Shaving Gen. 5	391-3-1-.02(2)(b), (g), and (mmm), NSR Avoidance	None	PSG0
PSG6	Peak Shaving Gen. 6	391-3-1-.02(2)(b), (g), and (mmm), NSR Avoidance	None	PSG0
PSG7	Peak Shaving Gen. 7	391-3-1-.02(2)(b), (g), and (mmm), NSR Avoidance	None	PSG0
PSG8	Peak Shaving Gen. 8	391-3-1-.02(2)(b), (g), and (mmm), NSR Avoidance	None	PSG0
EG01	Guard Post 79 Emergency Gen.	391-3-1-.02(2)(b), (g), and (mmm)	None	EG00

Emission Units		Specific Limitations/Requirements		
ID No.	Description	Applicable Requirements/Standards	APCD* ID No.	Equipment Group
EG02	North Parking Lot Emergency Gen.	391-3-1-.02(2)(b), (g), and (mmm)	None	EG00
EG10	North Vault (old) Emergency Gen.	391-3-1-.02(2)(b), (g), and (mmm)	None	EG00
EG11	North Vault (new) Emergency Gen.	391-3-1-.02(2)(b), (g), and (mmm)	None	EG00
EG12	South Vault Emergency Gen.	391-3-1-.02(2)(b), (g), and (mmm)	None	EG00
EG13	Concourse A Emergency Gen.	391-3-1-.02(2)(b), (g), and (mmm)	None	EG00
EG14	Concourse B Emergency Gen.	391-3-1-.02(2)(b), (g), and (mmm)	None	EG00
EG15	Concourse C Emergency Gen.	391-3-1-.02(2)(b), (g), and (mmm)	None	EG00
EG16	Concourse D Emergency Gen.	391-3-1-.02(2)(b), (g), and (mmm)	None	EG00
EG17	Terminal North Emergency Gen.	391-3-1-.02(2)(b), (g), and (mmm)	None	EG00
EG18	Terminal South Emergency Gen.	391-3-1-.02(2)(b), (g), and (mmm)	None	EG00
EG19	Main Terminal Emergency Gen. 1	391-3-1-.02(2)(b), (g), and (mmm)	None	EG00
EG20	Main Terminal Emergency Gen. 2	391-3-1-.02(2)(b), (g), and (mmm)	None	EG00

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

* APCD = Air Pollution Control Device

C. Equipment & Rule Applicability

Equipment and Rule Applicability specified in Permit No. 4581-063-0030-V-01-0 is discussed in the initial Title V permit narrative for this permit. Please refer to this initial Title V permit narrative. The initial Title V permit for the applicant included six boilers and twenty-one IC engines. The rule applicability for these boilers and IC engines is being re-evaluated in light of the adoption of Georgia Rules 391-3-1-.02(2)(III) and 391-3-1-.02(2)(mmm).

Existing Boilers in Equipment Group B000 - B001, B002, B003

Equipment Group B000 is comprised of three boilers, each of which was installed in 1993, burns natural gas as the primary fuel and Jet A fuel oil as backup fuel, and has a heat input capacity between 10 and 100 MMBtu/hr. These emission units are subject to Georgia Rules (d)2.(ii), (d)3, (g), and (yy). These emission units were subject to Georgia Rule (yy) because their potential to emit exceeded 1.0 tpy and the potential to emit of all Rule (yy) activities equal or exceeded 50 tpy. Georgia Rule (lll) was adopted by the DNR Board after issuance of the initial Title V permit for the airport. EPD evaluated the applicability of Georgia Rule (lll), rather than Georgia Rule (yy), for Equipment Group B000. Upon analysis, EPD has determined that the boilers in Equipment Group B000 are not subject to Georgia Rule (lll), rather than Georgia Rule (yy), because the boilers have not been modified (as defined in 40 CFR 60.14) on or after May 1, 1999. Therefore, the existing Georgia Rule (yy) conditions still apply.

Equipment Group EG00 – EG01, EG02, EG11, EG12, EG13, EG14, EG15, EG16, EG17, EG18, EG19, EG20

Equipment Group EG00 is comprised of thirteen IC engines and specific details of these engines are illustrated in the following table:

Source Code	Output Rating (kW)	Date Constructed	Operational Restrictions
EG01	894	Before 1992	Fuel type, emergency use, routine maintenance
EG02	894	Before 1992	Fuel type, emergency use, routine maintenance
EG10	894	Before 1992	Fuel type
EG11	894	Before 1992	Fuel type
EG12	894	Before 1992	Fuel type
EG13	894	Before 1992	Fuel type, emergency use, routine maintenance
EG14	894	Before 1992	Fuel type, emergency use, routine maintenance
EG15	894	Before 1992	Fuel type, emergency use, routine maintenance
EG16	894	Before 1992	Fuel type, emergency use, routine maintenance
EG17	894	Before 1992	Fuel type, emergency use, routine maintenance
EG18	894	Before 1992	Fuel type, emergency use, routine maintenance
EG19	1879	1992	Fuel type, emergency use, routine maintenance
EG20	1879	1992	Fuel type, emergency use, routine maintenance

The operational restrictions are in accordance with Georgia Rule 391-3-1-.02(2)(yy). From this analysis, EPD has determined that these engines were potentially subject to Georgia Rule 391-3-1-.02(2)(mmm), rather than Georgia Rule (yy), beginning May 1, 2003. The applicant did not

provide information in their Title V renewal application to support an exemption from Georgia Rule (mmm). Note: If the IC engines are exempt from Georgia Rule (mmm) then they are subject to Georgia Rule (yy). Thus, EPD is specifying that Georgia Rule (mmm) is an applicable requirement for the IC engines in Equipment Group EG00 during the ozone season in Condition 3.4.5. The permit also contains language which exempts an IC engine from this equipment group from the requirements of Georgia Rule (mmm)1(i) if the engine in question meets the definitions found in Georgia Rule (mmm)4(i) and 4(iii). Georgia Rule (mmm) imposes a short term NOx emission limit of 160 ppmvd at 15% oxygen since each engine was in operation before April 1, 2000.

Equipment Group PSG0 – PSG1, PSG2, PSG3, PSG4, PSG5, PSG6, PSG7, and PSG8

Equipment Group PSG0 is comprised of eight IC engines and specific details of these engines are illustrated in the following table:

Source Code	Output Rating (kW)	Date Constructed	Operational Restrictions
PSG1	1226	1993	Fuel type, emergency use, routine maintenance
PSG2	1226	1993	Fuel type, emergency use, routine maintenance
PSG3	1226	1993	Fuel type, emergency use, routine maintenance
PSG4	1226	1993	Fuel type, emergency use, routine maintenance
PSG5	1226	1993	Fuel type, emergency use, routine maintenance
PSG6	1226	1993	Fuel type, emergency use, routine maintenance
PSG7	1226	1993	Fuel type, emergency use, routine maintenance
PSG8	1226	1993	Fuel type, emergency use, routine maintenance

The operational restrictions are in accordance with Georgia Rule 391-3-1-.02(2)(yy). From this analysis, EPD has determined that these engines were potentially subject to Georgia Rule 391-3-1-.02(2)(mmm), rather than Georgia Rule (yy), beginning May 1, 2003. The applicant did not provide information in their Title V renewal application to support an exemption from Georgia Rule (mmm). Note: If the IC engines are exempt from Georgia Rule (mmm) then they are subject to Georgia Rule (yy). Thus, EPD is specifying that Georgia Rule (mmm) is an applicable requirement for the IC engines in Equipment Group PSG0 during the ozone season in Condition 3.4.5. The permit also contains language which exempts an IC engine from this equipment group from the requirements of Georgia Rule (mmm)1(i) if the engine in question meets the definitions found in Georgia Rule (mmm)4(i) and 4(iii). Georgia Rule (mmm) imposes a short term NOx emission limit of 160 ppmvd at 15% oxygen since each engine was in operation before April 1, 2000.

Equipment Group SB00 – SB04, SB05 and SB06

Amendment No. 4581-063-0030-V-01-1 added three new boilers to the facility. The allowable particulate matter emission rate from new boilers SB04, SB05, and SB06 is specified by Georgia Rule 391-3-1-.02(2)(d)2(ii). The following table illustrates the relationship between the allowable and anticipated actual particulate matter emission rates:

Boiler	Allowable PM Emission Rate (lb/MMBtu)	Anticipated Actual PM Emission Rate* (lb/MMBtu)
SB04	0.203 – NG 0.209 – FO	0.0076 – NG 0.0170 - FO
SB05	0.230 – NG 0.237 – FO	0.0076 – NG 0.0170 - FO
SB06	0.230 – NG 0.237 - FO	0.0076 – NG 0.0170 - FO

* Based on AP-42 and data taken from Appendix D of Permit Application No. 14517

The allowable opacity standard for each boiler is twenty (20) percent (6-minute average), except for one six-minute period per hour of not more than twenty-seven (27) opacity in accordance with 40 CFR 60 Subpart Dc and Georgia Rule 391-3-1-.02(2)(d)3.

There are no applicable state or federal emission standards for CO and VOC emissions from these new boilers. The net emissions increase of CO are below 100 tpy and thus there is no PSD Avoidance limit needed for CO emissions. The net emissions increase of VOCs is below 25 tons per year and thus there is no NAA/NSR Avoidance limit needed for VOC emissions.

The state fuel sulfur limit for the natural gas and fuel oil (including Jet A fuel) is specified by Georgia Rule 391-3-1-.02(2)(g), namely 2.5 weight percent. The federal fuel sulfur limit for the fuel oil (including Jet A fuel) is specified by 40 CFR 60 Subpart Dc, namely 0.5 weight percent. The applicant has requested a fuel oil sulfur content limit of 0.3 weight percent for PSD Avoidance purposes for SO₂ emissions (i.e., less than 40 tpy of SO₂ emissions net emissions increase). In addition, the applicant requests that the volume of fuel oil consumed by each boiler for PSD Avoidance purposes for SO₂ emissions be limited as follows: 743,000 gal/yr (SB04); 578,000 gal/yr (SB05); 578,000 gal/yr (SB06). The applicant submitted a calculation scheme to support these restrictions and that calculation scheme can be found in Section 4.3.3 of Permit Application No. 14517. EPD agrees with the applicant's conclusions.

The allowable short-term NO_x emission standard is 30 ppm, corrected to 3% oxygen, for the boilers during the ozone season (May 1 through September 30) in accordance with Georgia Rule 391-3-1-.02(2)(III)1(i). For purposes of NAA/NSR Avoidance, the net emissions increase of NO_x emissions must be less than 25 tons over five consecutive calendar years. The net emissions increase in NO_x emissions (i.e., potential NO_x emissions from new boilers minus the average actual NO_x emissions from the boilers to be replaced) exceeds 25 tons per year. Thus, HJAIA requests that the potential NO_x emissions from the new boilers be limited to 25 tpy. HJAIA proposes to utilize the ultra-low NO_x burner in each boiler which is anticipated to emit no more than 0.011 lb/MMBtu during natural gas combustion (0.011 lb/MMBtu is equivalent to 9 ppm, corrected to 3% oxygen).

There is no applicable state or federal emission limit for individual and total HAP emissions.

D. Compliance Status

The facility is operating in compliance with their air quality permit.

E. Operational Flexibility

None applicable.

F. Permit Conditions

Part 3.0 of the permit details the requirements for the emission units at the facility. Many of the conditions were simply carried over from Permit No. 4581-063-0030-V-01-0. However, the subsequent amendment modified these conditions, or over time the Division has updated the language and formatting of the conditions.

Equipment Emissions Caps and Operating Limits

Conditions 3.2.1, 3.2.2, 3.3.3, and 3.2.4 are discussed in Permit No. 4581-063-0030-V-01-0 in the initial Title V permit narrative. Please refer to this narrative.

Condition 3.2.5 lists the allowable fuels that the boilers in Equipment Group SB00 may accommodate for purposes of PSD Avoidance for SO₂ emissions and NAA/NSR Avoidance for NO_x emissions.

Conditions 3.2.6, 3.2.7, and 3.2.8 limit the fuel oil consumption by the boilers in Equipment Group SB00 for PSD Avoidance for SO₂ emissions.

Condition 3.2.9 limits the fuel oil sulfur content for PSD Avoidance for SO₂ emissions for the boilers in Equipment Group SB00.

Condition 3.2.10 restricts the allowable fuel that the boilers in Equipment Group SB00 may accommodate during the ozone season for purposes of compliance with Georgia Rule (III).

Condition 3.2.11 specifies the allowable NO_x emission rate from the boilers in Equipment Group SB00 on a combined basis for purposes of NAA/NSR Avoidance.

Equipment Federal Rule Standards

Boilers in Equipment Group B000 and SB00

Conditions 3.3.1 and 3.3.3 specify the requirements of 40 CFR Subpart Dc.

Boilers in Equipment Group B000

Condition 3.3.2 is discussed in Permit No. 4581-063-0030-V-01-0 in the initial Title V permit narrative. Please refer to this narrative.

Equipment SIP Rule Standards***Boilers in Equipment Groups B000 and SB00***

Condition 3.4.1 specifies the allowable PM emission rate in accordance with Georgia Rule (d)2(i) for the boilers.

IC engines in Equipment Groups EG00 and PSG0

Conditions 3.4.2 and 3.4.3 are discussed in Permit No. 4581-063-0030-V-01-0 in the initial Title V permit narrative. Please refer to this narrative.

Condition 3.4.5 defines the Georgia Rule (mmm) compliance schedule for each IC engine if HJAIA chooses to use these engines for non-emergency purposes.

Boilers in Equipment Group SB00

Condition 3.4.4 specifies the allowable ozone season NO_x emission rate in accordance with Georgia Rule (lll)1(i) for the boilers.

Equipment Standards Not Covered by a Federal or SIP Rule and Not Instituted as an Emission Cap or Operating Limit

Conditions 3.5.1 through 3.5.3 are discussed in Permit No. 4581-063-0030-V-01-0 in the initial Title V permit narrative. Please refer to this narrative.

Condition 3.5.4 specifies that for each IC engine in Equipment Groups EG00 and PSGO that cannot meet the definition of “Emergency standby stationary engine” found in Georgia Rule 391-3-1-.02(2)(mmm)4(i) and 4(iii), HJAIA shall only operate these IC engines in accordance with Georgia Rule 391-3-1-.02(2)(mmm)4(i).

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 prior to the date of the test(s) and a test plan is required to be submitted with the test notification. Test methods and procedures for determining compliance with applicable emission limitations are listed and test results are required to be submitted to the Division within 60 days of completion of the testing.

B. Specific Testing Requirements

1. Individual Equipment

Testing requirements specified in Permit No. 4581-063-0030-V-01-0 are discussed in the initial Title V permit narrative for this permit. Please refer to this narrative.

Conditions 4.2.1, 4.2.2, and 4.2.3 in Amendment 4581-063-0030-V-01-1 require an initial performance test for NO_x emissions from the boilers in Equipment Group SB00 to demonstrate compliance with Georgia Rule (III).

Conditions 4.2.4, 4.2.5, and 4.2.6 establish the applicable NO_x emission factors while burning natural gas in the boilers in Equipment Group SB00. The applicable NO_x emission factor will be the greater of the test results or 0.011 lb/MMBtu, which is the emission factor provided by HJAIA. This emission factor will be used to calculate NO_x emissions from the boiler during natural gas combustion.

Conditions 4.2.7, 4.2.8, and 4.2.9 require an initial performance test for opacity on the boilers in Equipment Group SB00 when burning fuel oil, as required in Subpart Dc.

Conditions 4.2.10 and 4.2.11 require either an initial performance test for NO_x emissions from the IC engines in Equipment Groups EG00 and PSG0 or certification that the engines are not subject to Georgia Rule (mmm).

2. Equipment Groups (all subject to the same test 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

1. Individual Equipment:

Monitoring requirements specified in Permit No. 4581-063-0030-V-01-0 are discussed in the initial Title V permit narrative for this permit. Please refer to this initial Title V permit narrative. As noted in Section III, the IC engines in Equipment Groups EG00 and PSG0 are assumed to be subject to Georgia Rule (mmm) during the ozone season unless otherwise proven by the applicant. Georgia Rule (mmm) limits the short term NOx emission rate from each applicable IC engine to 160 ppmvd at 15% oxygen during each ozone season.

To provide reasonable assurance that the NOx emissions limitations are not exceeded, monitoring is required. Monitoring consists of measurements of NOx and oxygen concentration using a portable analyzer (Conditional Test Method 30). Hartsfield is required to perform an initial measurement of the NOx concentration from each applicable IC engine by September 30, 2004. The frequency of monitoring will be contingent on whether the tested NOx emission rate is less than or equal to, or, greater than 50 percent of the allowable. A measurement at intervals of 120 hours of operation shall be conducted on the unit until a measurement is less than or equal to 50 percent of the allowable. At such a time that the measurement is less than or equal to 50 percent of the allowable, a measurement at an interval of 240 hours of operation shall be conducted. Following any measurement on a unit that is greater than 50 percent of the allowable, Hartsfield shall conduct a measurement at 120 hours of operation. Note that the monitoring provisions only apply during the ozone season and that they only apply to those IC engines that the applicant cannot certify compliance with Georgia Rule (mmm)4(i). An excursion is defined as any CTM-30 measurement that is in excess of 160 ppmvd at 15% oxygen.

Amendments and Modifications

Condition 5.2.1 establishes the monitoring requirements for the boilers, added in Amendment 4581-063-0030-V-01-1, to ensure that the applicable emission factors determined in Conditions 4.2.4, 4.2.5, and 4.2.6 are being maintained. The condition requires that NOx emissions be monitored using CTM-30 (a portable NOx analyzer) on a monthly basis until results show two consecutive measurements of less than the applicable emission factor, at which time the frequency is reduced to quarterly. Any exceedance of the applicable emission factor triggers daily monitoring until corrected. The Division has determined that this monitoring is needed because the emission factor provided by HJAIA

for natural gas combustion (0.011 lb/MMBtu) is unusually low, and HJAIA wants to use the emission factor to determine actual NO_x emissions.

Condition 5.2.2 establishes the monitoring requirements for the boilers to demonstrate compliance with the NO_x emission limit specified by Georgia Rule (III). This condition requires an initial CTM-30 measurement during May of each year. If results meet the specifications, less frequent monitoring is allowed.

Condition 5.2.3 requires that HJAIA install fuel meters on the boilers. These meters will track usage of natural gas and fuel oil. Fuel usage records are required under Subpart Dc.

Condition 5.2.4 requires HJAIA to install and operate hours meters on IC engines in Equipment Group PSG0. These records are then used to calculate NO_x emissions from the IC engines.

Condition 5.2.5 establishes the monitoring requirements for the IC engines to demonstrate compliance with the NO_x emission limit specified by Georgia Rule (mmm).

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

None applicable.

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.

A major difference in the change in the processing of permits within the Division is in regards to the reporting of deviations. Permit No. 4581-063-0030-V-01-0 and subsequent amendment do not expressly state excess emissions, excursions, or exceedances as the current Title V permit template so defines. Therefore Condition 6.1.7 is entirely new and was not carried over from any previous conditions in the initial permit or amendments.

Condition 6.1.7.b.i defines exceedances for Boilers B000 and IC engines PSG0 as any rolling annual average NO_x emissions greater than 24.9 tons. This is an exceedance because the facility is avoiding PSD review by limiting the boilers NO_x emissions, through monitoring and recordkeeping of the fuel records in each boiler in Equipment Group B000 and IC engines in Equipment Group PSG0.

Condition 6.1.7.b.ii defines an exceedance for Boilers in Equipment Group B000 as any twelve consecutive month fuel oil consumption which exceed 500,000 gallons. This is an exceedance because the facility is avoiding PSD review by limiting the boilers SO₂ emissions, through recordkeeping of the amount of fuel-fired in each boiler in Equipment Group B000.

Condition 6.1.7.b.iii defines an exceedance for Boiler SB04 as any twelve consecutive month fuel oil consumption which exceed 743,000 gallons. This is an exceedance because the facility is avoiding PSD review by limiting the boilers SO₂ emissions, through recordkeeping of the amount of fuel-fired in the boiler.

Condition 6.1.7.b.iv defines an exceedance for Boiler SB04 as each measurement of nitrogen oxides, during the ozone season, that exceeds 30 ppm. This is in regards to the limit placed on the boiler by Georgia Rule 391-3-.02(2)(III)1(i). Neither Georgia Rule (III) nor the Division's Procedures for Testing and Monitoring Sources of Air Pollutants defined an excess emission for this rule therefore it is an exceedance.

Condition 6.1.7.b.v defines an exceedance for Boiler SB05 as any twelve consecutive month fuel oil consumption which exceed 578,000 gallons. This is an exceedance because the facility is avoiding PSD review by limiting the boilers SO₂ emissions, through recordkeeping of the amount of fuel-fired in the boiler.

Condition 6.1.7.b.vi defines an exceedance for Boiler SB05 as each measurement of nitrogen oxides, during the ozone season, that exceeds 30 ppm. This is in regards to the limit placed on the boiler by Georgia Rule 391-3-.02(2)(III)1(i). Neither Georgia Rule (III) nor the Division's Procedures for Testing and Monitoring Sources of Air Pollutants defined as an excess emission for this rule therefore it is an exceedance.

Condition 6.1.7.b.vii defines an exceedance for Boiler SB06 as any twelve consecutive month fuel oil consumption which exceed 578,000 gallons. This is an exceedance because the facility is avoiding PSD review by limiting the boilers SO₂ emissions, through recordkeeping of the amount of fuel-fired in the boiler.

Condition 6.1.7.b.viii defines an exceedance for Boiler SB06 as each measurement of nitrogen oxides, during the ozone season, that exceeds 30 ppm. This is in regards to the limit placed on the boiler by Georgia Rule 391-3-.02(2)(III)1(i). This is not explicitly defined as an excess emission therefore it is an exceedance.

Condition 6.1.7.b.ix defines exceedances for Boilers SB00 as any rolling annual average NO_x emissions greater than 25 tons. This is an exceedance because the facility is avoiding PSD review by limiting the boilers NO_x emissions, through monitoring and recordkeeping of the fuel records in each boiler in Equipment Group SB00.

Condition 6.1.7.b.x defines an exceedance for Boilers SB00 as any fuel oil sulfur content greater than 0.3% by weight. This is an exceedance because the facility is avoiding PSD review by limiting the boilers SO₂ emissions, through recordkeeping of the sulfur content of the fuel-fired in each boiler.

Condition 6.1.7.b.xi defines an exceedance for Boilers B000 as any fuel oil sulfur content greater than 0.5% by weight. This is in regards to the limit placed on the facility by 40 CFR 60.42c(d) and 60.42c(i). This is not explicitly defined as an excess emission therefore it is an exceedance.

Condition 6.1.7.b.xii defines an exceedance for Emergency IC engines in Equipment Groups EG00 and PSG0 as any fuel oil sulfur content greater than 2.5% by weight. This is in regards to the limit placed on the IC engines by Georgia Rule 391-3-1-.02(2)(d). This is not explicitly defined as an excess emission therefore it is an exceedance.

Condition 6.1.7.c.i defines an excursion for Boiler SB04 as each measurement of nitrogen oxides that exceeds the applicable NO_x emission factor as per Condition 4.2.4. This is in regards to the applicability of Georgia Rule 391-3-.02(6)(b)1.

Condition 6.1.7.c.ii defines an excursion for Boiler SB05 as each measurement of nitrogen oxides that exceeds the applicable NO_x emission factor as per Condition 4.2.5. This is in regards to the applicability of Georgia Rule 391-3-.02(6)(b)1.

Condition 6.1.7.c.iii defines an excursion for Boiler SB06 as each measurement of nitrogen oxides that exceeds the applicable NO_x emission factor as per Condition 4.2.6. This is in regards to the applicability of Georgia Rule 391-3-.02(6)(b)1.

Condition 6.1.7.c.iv defines an excursion for IC Engines in Equipment Groups EG00 and PSG0 that cannot meet the definition of “Emergency Standby stationary engine” found in Georgia Rule 391-3-1-.02(2)(mmm)4, that exceeds 160 parts per million, corrected to 15 percent oxygen.

B. Specific Record Keeping and Reporting Requirements

Record keeping and reporting requirements specified in Permit No. 4581-063-0030-V-01-0 are discussed in the initial Title V permit narrative for this permit. Please refer to this narrative.

Amendments and Modification

Condition 6.2.3 required HJAIA to maintain monthly records of the hours of operation and purpose of each IC engine in Equipment Groups PSG0 and EG00.

Condition 6.2.4 requires HJAIA to maintain records which specify the natural gas and fuel oil usage for each boiler in Equipment Group B000.

Condition 6.2.5 requires HJAIA to maintain records which specify the natural gas and fuel oil usage for each boiler (Source Codes SB04, SB05, and SB06).

Condition 6.2.6 requires HJAIA to calculate and record the twelve consecutive month total quantity of fuel oil usage for each boiler (Source Codes SB04, SB05, and SB06).

Condition 6.2.7 requires HJAIA to calculate and record the twelve consecutive month total quantity of fuel oil usage for each boiler in Equipment Group B000.

Condition 6.2.8 was carried over from Condition 5.2.1 in Permit No. 4581-063-0030-V-01-1 about the fuel certification requirements for each shipment.

Condition 6.2.9 specifies what is needed for certification of fuel sulfur content of distillate fuel oil for compliance with Condition 3.2.4.

Conditions 6.2.10 and 6.2.11 provide the formulas and requirements that HJAIA follows to compute the rolling annual NOx emissions from the boilers in Equipment Group B000 and IC engines in Equipment Group PSG0 on a combined basis. NOx emissions are computed using the applicable emission factors and fuel usage records.

Conditions 6.2.12, 6.2.13, 6.2.14, and 6.2.15 provide the formulas and requirements that HJAIA follows to compute the rolling annual NOx emissions from the boilers (Source Codes SB04, SB05, and SB06) on a combined basis. NOx emissions are computed using the applicable emission factors and fuel usage records.

Conditions 6.2.16, 6.2.17, and 6.2.18 specify the 40 CFR 60 Subpart A reporting requirements for the boilers.

Condition 6.2.19 specifies additional information that HJAIA must submit as a part of the reporting requirement of Condition 6.1.7. This condition includes NOx emissions from Equipment Groups B000 and PSG0, fuel oil consumptions, fuel supplier certifications and NOx emissions from Equipment Group SB00.

Condition 6.2.20 requires HJAIA to submit information about each IC engine at the facility. This is to verify which IC engines are subject to Georgia Rule (mmm).

VII. Specific Requirements

A. Operational Flexibility

Operational flexibility does not need to be incorporated into this Title V Permit. The applicant did not include any alternative operating scenarios in their Title V Application.

B. Alternative Requirements

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

C. Insignificant Activities

A list of insignificant activities in existence at the facility at the time of the permit issuance is attached at the end of the Title V Permit. These insignificant emissions units may also be on Forms D.1, D.2, D.3, and D.6 of the Title V application.

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

D. Temporary Sources

HJAIA has not requested to operate any temporary sources.

E. Short-Term Activities

HJAIA is responsible for maintaining all the runways, taxiways, and rampways at the airport. Part of this responsibility includes applying ethylene glycol-based de-icing/anti-icing fluid during potential icing events, applying asphalt concrete as needed to maintain safe operation, and applying concrete stain (coating) as needed to maintain safe operations. See section D.5 of the Title V application for a more complete description.

These operations are not subject to any state or federal air quality requirements other than the general provisions of the Georgia Rules for Air Quality Control. This requirement and the requirement to keep records of the frequency and duration of these activities has been included in Section 7.6 of the permit.

F. Compliance Schedule/Progress Reports

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

G. Emissions Trading

This facility is not involved in any emission trading programs.

H. Acid Rain Requirements

This facility is not subject to any requirements in Title IV of the Clean Air Act.

I. Stratospheric Ozone Protection Requirements

This facility is not subject to any requirements in the Title VI Stratospheric Ozone Protection Requirements.

J. Pollution Prevention

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

K. Specific Conditions

Not 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.

Addendum to Narrative

EPD issued draft Title V Permit 4581-063-0030-V-02-0 for Hartsfield-Jackson Atlanta International Airport in Atlanta, Georgia on February 19, 2004. The public notice for this permit was published in the Clayton News Daily on March 5, 2004 and in the Fulton County Daily Report on March 5, 2004. The public comment period expired April 5, 2004. Comments were received from Hartsfield – Jackson Atlanta International Airport on April 5, 2004. Each comment is printed below, followed by a discussion of the comment and any changes made to the permit as a result.

Review of Applicant's Comments

1. City of Atlanta Department of Aviation (DOA) respectfully requests that the facility description on the permit cover page be reworded to read: "Facility primarily engaged in operating and maintaining Hartsfield – Jackson Atlanta International Airport, including, but not limited to, fuel burning equipment used for heating and cooling and stationary internal combustion engines used for generation of electricity."

Response: EPD agrees and has revised this accordingly.

2. Draft permit condition numbers 3.2.10, 3.4.4, 3.4.5, 5.2.2, and 5.2.5 define the ozone season as the time period beginning May 1 and ending September 30. Draft permit condition numbers 3.5.2, 3.5.3, and 6.2.2 define the ozone season as the time period beginning April 1 and ending October 31. Please revise these conditions as necessary to reflect a consistent definition of the ozone season.

Response: EPD agrees that the period of April 1 through October 30, during which the limits in draft permit condition nos. 3.5.2, 3.5.3, and 6.2.2 are indicated as being applicable, is not the ozone season. This period actually extends one month earlier and one month later than the Georgia ozone season and yet, contradictorily, each of these conditions states that this period is the ozone season. That is clearly not true and should be corrected. Therefore the language indicating that April 1 through October 30 is the ozone season will be removed.

However, the period during which the requirements of condition nos. 3.5.2, 3.5.3, and 6.2.2 are effective will not be changed. These requirements were set by a Rule(yy) RACT determination which was included in identical conditions in the initial Title V permit, No. 4581-063-0030-V-01-0. To change these conditions would require that EPD carry out a new case-by-case NOx RACT determination; that is not within the scope of Title V renewal permitting.

Note that Rule(yy) is a year-round requirement; there is no connection between Rule(yy) and the ozone season. Therefore, NOx limiting permit conditions can be effective for any period of time specified.

3. Draft permit condition 6.2.10 requires monthly NOx emissions from burning natural gas in boilers of Equipment Group B000 to be computed using an emission factor of 140 pounds per million cubic feet (lb/mmcf) of natural gas. DOA believes that the NOx emissions from the combustion of natural gas would be more accurately calculated based on the most recent EPA AP-42 NOx emission factor of 100 lb/mmcf for this type equipment.

Response: EPD agrees and has revised this condition accordingly.

4. Draft permit condition 5.2.2.c requires that if the initial measurement of NO_x concentration is equal to or greater than 30 ppm (@ 3% O₂), then monitoring must continue on a daily basis until the measurement shows the NO_x concentration is less than 30 ppm (@ 3% O₂). Draft permit condition 6.1.7.b. defines each measurement of NO_x that exceeds 30 ppm (@ 3% O₂) as an exceedance. DOA respectfully requests that additional information be included in the permit to state when such exceedance, if applicable, must be considered as a deviation from permit conditions for compliance purposes.

Response: Condition 6.1.7.b.iv, vi, and viii specifically states that each measurement (by CTM-30) of Nitrogen Oxides from Boilers SB04, SB05, and SB06, during the ozone season, that exceeds 30 ppm, corrected to 3 percent oxygen, is an exceedance, which is one kind of “deviation”. EPD believes that this is an appropriate and clear definition and no additional information is warranted. The Stationary Source Compliance Program will use their discretion, when such exceedances occur based on the information provided by the facility, and determine if enforcement action is needed.

5. Multiple conditions throughout the draft permit make inconsistent reference to fuel oil and Jet A fuel used in combustion devices (i.e., 3.2.3, 3.2.5, 3.2.9, 3.2.10, 4.1.3, 4.2.7 through 4.2.9, 5.2.1, 5.2.3, and 6.1.7). The DOA respectfully requests that all references to liquid fuels in the permit meet a consistent usage, such as “fuel oil, including Jet A fuel,” where fuel oil is defined as in draft permit condition 6.2.9 and Jet A is defined as in draft permit condition 6.2.8.

Response: Upon examination, EPD agrees that the fuel oil, Jet A fuel oil, and No. 2 fuel oil references in Draft Condition Nos. 3.2.1, 3.2.3, 3.2.4, 3.2.5, 3.2.6, 3.2.7, 3.2.8, 3.2.9, 3.2.10, 3.3.2, 4.1.3.i, 4.2.7, 4.2.8, 5.2.2.d, 5.2.3, 6.1.7.b.ii, 6.1.7.b.iii, 6.1.7.b.v, 6.1.7.b.vii, 6.1.7.b.x, 6.1.7.b.xi, 6.1.7.b.xii, 6.2.4, 6.2.5, 6.2.6, 6.2.7, 6.2.8, 6.2.9, 6.2.10, 6.2.12, 6.2.13, 6.2.14, 6.2.19.b, 6.2.19.c, 6.2.19.d, 6.2.19.e, 6.2.19.f, and 6.2.19.g need to be clarified and corrected where applicable.

EPD examined Title V Application No. 14165 and initial Title V Permit No. 4581-063-0030-V-01-0 to identify the permitted fuel types for use in the boilers and IC engines. EPD examined Draft Permit No. 4581-063-0030-V-02-0 to identify the proposed fuel types for the boilers and IC engines. This examination reveals the following observations related to fuel oil, Jet A fuel oil, and No. 2 fuel oil:

Draft Condition No.	Equipment ID	Equipment Group	Listed Fuels in Draft Permit	Allowable Fuel(s)	Draft Condition Revised to Reference
3.2.1	NA	B000	Fuel Oil	Jet A Fuel Oil	Jet A Fuel Oil
3.2.3	NA	B000	Jet A Fuel Oil	Jet A Fuel Oil	NCN
3.3.2	NA	B000	Fuel Oil	Jet A Fuel Oil	See note 1
6.1.7.b.iii	NA	B000	Fuel Oil Jet A fuel	Jet A Fuel Oil	Jet A Fuel Oil
6.1.7.b.xi	B001 B002 B003	B000	Fuel Oil	Jet A Fuel Oil	Jet A Fuel Oil
6.2.4	NA	B000	Fuel Oil	Jet A Fuel Oil	Jet A Fuel Oil
6.2.8	NA	B000	Jet A Fuel Oil	Jet A Fuel Oil	NCN
6.2.19.b	NA	B000	Jet A Fuel Oil	Jet A Fuel Oil	NCN

Draft Condition No.	Equipment ID	Equipment Group	Listed Fuels in Draft Permit	Allowable Fuel(s)	Draft Condition Revised to Reference
6.2.19.f	NA	B000	Jet A Fuel Oil	Jet A Fuel Oil	NCN
6.2.10	NA	B000	Distillate Fuel Oil	Jet A Fuel Oil	Jet A Fuel Oil No. 2 Fuel Oil
3.2.5	NA	SB00	Jet A Fuel Oil	Jet A Fuel Oil	NCN
3.2.6	SB04	SB00	Jet A Fuel Oil	Jet A Fuel Oil	NCN
3.2.7	SB05	SB00	Jet A Fuel Oil	Jet A Fuel Oil	NCN
3.2.8	SB06	SB00	Jet A Fuel Oil	Jet A Fuel Oil	NCN
3.2.9	NA	SB00	Fuel Oil	Jet A Fuel Oil	Jet A Fuel Oil
3.2.10	NA	SB00	Fuel Oil	Jet A Fuel Oil	Jet A Fuel Oil
4.2.7	SB04	SB00	Fuel Oil	Jet A Fuel Oil	Jet A Fuel Oil
4.2.8	SB05	SB00	Fuel Oil	Jet A Fuel Oil	Jet A Fuel Oil
4.2.9	SB06	SB00	Fuel Oil	Jet A Fuel Oil	Jet A Fuel Oil
5.2.1.d	NA	SB00	Fuel Oil	Jet A Fuel Oil	Jet A Fuel Oil
5.2.3	NA	SB00	Fuel Oil	Jet A Fuel Oil	Jet A Fuel Oil
6.1.7.b.iii	SB04	SB00	Fuel Oil Jet A Fuel	Jet A Fuel Oil	Jet A Fuel Oil
6.1.7.b.v	SB05	SB00	Fuel Oil Jet A Fuel	Jet A Fuel Oil	Jet A Fuel Oil
6.1.7.b.vii	SB06	SB00	Fuel Oil Jet A Fuel	Jet A Fuel Oil	Jet A Fuel Oil
6.1.7.b.x	SB04 SB05 SB06	SB00	Fuel Oil Jet A Fuel	Jet A Fuel Oil	Jet A Fuel Oil
6.2.5.b	SB04 SB05 SB06	SB00	Fuel Oil Jet A Fuel	Jet A Fuel Oil	Jet A Fuel Oil
6.2.7	SB04 SB05 SB06	SB00	Fuel Oil Jet A Fuel	Jet A Fuel Oil	Jet A Fuel Oil
6.2.8	NA	SB00	Jet A Fuel Oil	Jet A Fuel Oil	NCN
6.2.12	SB04	SB00	Fuel Oil	Jet A Fuel Oil	Jet A Fuel Oil
6.2.13	SB05	SB00	Fuel Oil	Jet A Fuel Oil	Jet A Fuel Oil
6.2.14	SB06	SB00	Fuel Oil	Jet A Fuel Oil	Jet A Fuel Oil
6.2.19.c	SB04	SB00	Jet A Fuel Oil	Jet A Fuel Oil	NCN
6.2.19.d	SB05	SB00	Jet A Fuel Oil	Jet A Fuel Oil	NCN
6.2.19.e	SB06	SB00	Jet A Fuel Oil	Jet A Fuel Oil	NCN
6.2.19.f	NA	SB00	Jet A Fuel Oil	Jet A Fuel Oil	NCN
3.2.4	NA	EG00	Jet A Fuel Oil No. 2 Fuel Oil	Jet A Fuel Oil No. 2 Fuel Oil	NCN
6.1.7.b.xii	NA	EG00	Fuel Oil	Jet A Fuel Oil No. 2 Fuel Oil	Jet A Fuel Oil No. 2 Fuel Oil
6.2.8	NA	EG00	Jet A Fuel Oil	Jet A Fuel Oil	NCN

Draft Condition No.	Equipment ID	Equipment Group	Listed Fuels in Draft Permit	Allowable Fuel(s)	Draft Condition Revised to Reference
				No. 2 Fuel Oil	
6.2.9	NA	EG00	Fuel Oil other than Jet A fuel Oil	Jet A Fuel Oil No. 2 Fuel Oil	No. 2 Fuel Oil
6.2.19.f	NA	EG00	Jet A Fuel Oil	Jet A Fuel Oil No. 2 Fuel Oil	NCN
6.2.19.g	NA	EG00	Fuel Oil other than Jet A fuel Oil	Jet A Fuel Oil No. 2 Fuel Oil	No. 2 Fuel Oil
3.2.4	NA	PSG0	Jet A Fuel Oil No. 2 Fuel Oil	Jet A Fuel Oil No. 2 Fuel Oil	NCN
6.1.7.b.xii	NA	PSG0	Fuel Oil	Jet A Fuel Oil No. 2 Fuel Oil	Jet A Fuel Oil No. 2 Fuel Oil
6.2.8	NA	PSG0	Jet A Fuel Oil	Jet A Fuel Oil No. 2 Fuel Oil	NCN
6.2.9	NA	PSG0	Fuel Oil other than Jet A fuel Oil	Jet A Fuel Oil No. 2 Fuel Oil	NCN
6.2.10	NA	PSG0	Distillate Oil	Jet A Fuel Oil No. 2 Fuel Oil	Jet A Fuel Oil No. 2 Fuel Oil
6.2.19.f	NA	PSG0	Jet A Fuel Oil	Jet A Fuel Oil No. 2 Fuel Oil	Jet A Fuel Oil
6.2.19.g	NA	PSG0	Fuel Oil other than Jet A fuel Oil	Jet A Fuel Oil No. 2 Fuel Oil	No. 2 Fuel Oil
4.1.3.i	NA	NA	Fuel Oil	Jet A Fuel Oil No. 2 Fuel Oil	See note 2

NCN = No Change to Draft Permit Condition Necessary

Note 1 = Equipment Group B000 is subject to NSPS Dc, and the Equipment Group may burn natural gas or Jet A Fuel Oil. Condition 3.3.3 specifies that Equipment Group B000 shall not fire any Jet A fuel in the boilers that contains greater than 0.5 weight percent sulfur. Jet A fuel has a fuel sulfur content of 0.3 weight percent therefore will meet the fuel sulfur limit imposed by NSPS Dc.

Note 2 = Method 19 adequately addresses both types of fuel oil – Jet A fuel and No. 2 fuel oil. Method 19 is a procedural method that refers back to the appropriate ASTM for that fuel. Also, since Jet A and No. 2 fuel oil are both low sulfur fuels, the Method is appropriate for determining sulfur content.

Based on EPD's re-examination of the types of fuel oil (i.e., fuel oil, Jet A fuel oil, and/or No. 2 fuel oil), EPD believes that the changes noted in the table above will clear up the confusion presented by HJAIA.

6. DOA respectfully requests that draft permit condition 5.2.5 be revised and clarified by inserting the phrase “that cannot meet the definition of ‘Emergency standby stationary engine’ found in Georgia Rule 391-3-1-.02(2)(mmm)4” into the introductory sentence following “. . . Equipment Groups EG00 and PSG0.”

Response: EPD agrees and has revised this condition accordingly.

7. Because DOA does not receive discreet deliveries of fuel oil, including Jet A fuel, for used in its combustion devices, as a practical matter we could not comply with draft permit conditions 6.2.8 and 6.2.9 as written for a statement from the supplier. DOA respectfully requests that the phrase “For each shipment of Jet A fuel oil/fuel oil” in these conditions be replaced with the phrase “For each quarterly period that Jet A fuel/fuel oil is.”

Response: EPD agrees and has revised these conditions accordingly.

8. Draft permit condition 6.2.20 would require that specific information for each stationary internal combustion engine “shall be submitted” by DOA to EPD. However, draft permit conditions 4.2.11 and 5.2.6 allow that DOA “may submit” essentially the same information to EPD. Therefore, draft permit conditions 4.2.11 and 5.2.6 appear to be superfluous and DOA respectfully requests that they be removed from the permit. Alternatively, these two conditions could be revised to state “The Permittee shall submit the written documentation required under Condition 6.2.20 to the Division . . .”

Response: EPD agrees that Draft Condition Nos. 4.2.11, 5.2.6, and 6.2.20 ask for the same information to be reported on or before January 31, 2004. EPD agrees to delete Draft Condition Nos. 4.2.11 and 5.2.6. In addition, EPD has modified Draft Condition Nos. 4.2.10 and 5.2.5 to clarify when these conditions are effective.

9. Draft permit condition 7.6.1.a. refers to the application of ethylene glycol-based de-icing/anti-icing fluid, which DOA no longer uses. DOA only uses propylene glycol-based deicing/anti-icing fluid. DOA respectfully requests that this requirement be revised to reflect the usage of propylene glycol-based die-icing/anti-icing fluid.

Response: EPD agrees and has revised this condition accordingly.

10. Draft permit condition 7.12 indicates the issuance date of the original Title V permit 4581-063-0030-V-01-0 is 05/8/1998. DOA believes it would be more appropriate to identify the effective date of each permit. The effective date for the original Title V permit is 06/08/1998.

Response: EPD agrees and has revised this condition accordingly.

11. The Title V renewal application files available for public review on the EPD website do not contain the latest amendment information to the renewal application (submitted February 2004).

Response: This comment is noted EPD will make sure that the most recent documents are on the website as soon as practicable.

PERMIT REVISIONS FOR HARTSFIELD – JACKSON ATLANTA INTERNATIONAL AIRPORT
4581-063-0030-V-02-0

Permit Cover Page Description

Facility primarily engaged in operating and maintaining Hartsfield – **Jackson** Atlanta International Airport, including, **but not limited to**, fuel burning equipment **used for heating and cooling and stationary internal combustion engines used for generation of electricity.**

- 3.2.1 The Permittee shall limit the firing of ~~fuel oil~~ **Jet A fuel** in the boilers in Equipment Group B000 such that the total quantity of **Jet A fuel** burned during any 12 consecutive month period does not exceed 500,000 gallons.
[PSD Avoidance for SO₂, 391-3-1-.03(2)(c)]
- 3.2.4 The Permittee shall not fire any fuel other than ~~natural gas~~, Jet A fuel or #2 fuel oil in any source in Equipment Group EG00 or PSG0.
[391-3-1-.03(2)(c)]
- 3.2.9 The Permittee shall not fire ~~fuel oil~~ **Jet A fuel** in boilers in Equipment Group SB00 that contains greater than 0.3 weight percent sulfur.
[PSD Avoidance – 40 CFR 52.21; 391-3-1-.02(2)(g)(subsumed); 40 CFR 60.42c(d)(subsumed)]
- 3.2.10 The Permittee shall not fire any ~~fuel oil~~ **Jet A fuel** in boilers in Equipment Group SB00 during the ozone season (May 1 through September 30).
[391-3-1-.03(2)(c)]
- ~~3.3.2 Fuel oil fired in the boilers in Equipment Group B000 shall meet the specifications for fuel oil numbers 1 or 2, as defined by the American Society for Testing and Materials in ASTM D396, Standard Specification for Fuel Oils. No fuel oil shall be fired in these boilers that contains greater than 0.5 weight percent sulfur.
[40 CFR 60.42c(d)]~~
- 3.3.3 The Permittee shall not fire Jet A fuel in boilers in Equipment Group B000 that contains greater than 0.5 weight percent sulfur.
[40 CFR 60.42c(d)]**
- 3.5.2 If documentation is submitted to the Division confirming that certain fuel burning equipment in Equipment Group B000 is not operated ~~during the ozone season~~ **from** April 1 through October 31, such equipment shall be exempt from the annual tune-up requirement.
[391-3-1-.02(2)(yy)]

- 3.5.3 With the exception of periods of natural gas curtailment, the Permittee shall fire only natural gas ~~during the ozone season~~ **from** April 1 through October 31, in all fuel burning equipment in Equipment Group B000 and fuel burning equipment in Attachment B subject to Georgia Rule 391-3-1-.02(2)(yy). Fuel burning equipment includes all boilers and water heaters but not internal combustion engines such as electric generators. [391-3-1-.02(2)(yy)]
- 4.1.3 Performance and compliance tests shall be conducted and data reduced in accordance with applicable procedures and methods specified in the Division's Procedures for Testing and Monitoring Sources of Air Pollutants. The methods for the determination of compliance with emission limits listed under Sections 3.2, 3.3, 3.4, and 3.5 are as follows:
- i. Method 19, Section 5.2.2 shall be used to determine the sulfur content of ~~fuel oil~~ **No. 2 fuel oil and Jet A fuel**.
- 4.2.7 Within 60 days after achieving maximum steam production by boiler SB04, but no later than 180 days after initial startup, the Permittee shall conduct a performance test for opacity of emissions while the boiler is firing ~~fuel oil~~ **Jet A fuel** only. [391-3-1-.02(6)(b)1, 40 CFR 60.11, and 40 CFR 60.45c]
- 4.2.8 Within 60 days after achieving maximum steam production by boiler SB05, but no later than 180 days after initial startup, the Permittee shall conduct a performance test for opacity of emissions while the boiler is firing ~~fuel oil~~ **Jet A fuel** only. [391-3-1-.02(6)(b)1, 40 CFR 60.11, and 40 CFR 60.45c]
- 4.2.9 Within 60 days after achieving maximum steam production by boiler SB06, but no later than 180 days after initial startup, the Permittee shall conduct a performance test for opacity of emissions while the boiler is firing ~~fuel oil~~ **Jet A fuel** only. [391-3-1-.02(6)(b)1, 40 CFR 60.11, and 40 CFR 60.45c]
- 4.2.10 The Permittee shall conduct performance tests for nitrogen oxides emissions from each IC engine in Equipment Groups EG00 and PSG0 by September 30, 2004 to verify compliance with Condition 3.4.5. **In order for an engine, to avoid these testing requirements and to avoid the applicable monitoring requirements noted in Condition 5.2.5, the Permittee shall submit written documentation to the Division (certification by a Responsible Official) that the particular IC engine will only operate in accordance with Georgia Rule 391-3-1-.02(2)(mmm)4(i) during the ozone season. Such documentation must be received by the Division on or before July 31, 2004. [391-3-1-.02(6)(b)1]**
- 4.2.11 ~~The Permittee may submit written documentation to the Division (certification by a Responsible Official) that the particular IC engine will only operate in accordance with Georgia Rule 391-3-1-.02(2)(mmm)4(i) during the ozone season to avoid the applicable testing requirements noted in Condition 4.2.10 and avoid the applicable monitoring requirements noted in Condition 5.2.5. Such documentation must be received by the Division on or before July 31, 2004. [391-3-1-.02(6)(b)1]~~

- 5.2.1 Within 30 days following the performance test required by Condition 4.2.1, 4.2.2, 4.2.3, whichever is applicable, the Permittee shall monitor emissions of nitrogen oxides (NOx) from boilers in Equipment Group SB00, whichever is applicable, using the following protocol: [NAA/NSR Avoidance, 391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]
- a. For any calendar month during which the applicable boiler (SB04, SB05, or SB06) is operated on natural gas for more than 168 hours and/or is operated on ~~fuel oil~~ **Jet A fuel** for more than 168 hours, except as provided for in (e) of this condition, the Permittee shall conduct measurements of Nitrogen oxides (NOx) and oxygen in the exhaust gas of the unit. The measurement period shall consist of one (1) test run thirty minutes in duration.
 - d. Following any monthly measurement of Nitrogen oxides emissions (lb/MMBtu) which is determined to be greater than the applicable NOx emission factor for natural gas (0.011 lb/MMBtu or the emission factor as established by the applicable performance test required in Condition Nos. 4.2.1, 4.2.2, or 4.2.3, which ever is greater) or for ~~fuel oil~~ **Jet A fuel** (0.15 lb/MMBtu), the Permittee shall make adjustments to the boiler and conduct a new measurement within one day. Daily measurements shall be continued until a measurement shows the Nitrogen Oxides emissions are less than or equal to the applicable NOx emission factor.
- 5.2.3 The Permittee shall install, calibrate, maintain, and operate the following monitoring devices for the measurement of the indicated parameters on each boiler with ID numbers SB04, SB05, and SB06. Data shall be recorded at the frequencies specified below. Where such performance specification(s) exist, each system shall meet the applicable performance specification(s) of the Division's monitoring requirements. [391-3-1-.02(6)(b)1, 40 CFR 70.6(a)(3)(i), NAA/NSR Avoidance, PSD Avoidance for SO₂, Alternative Monitoring of Fuel Consumption under NSPS Dc, Approved by U.S. EPA Region 4 on August 14, 1996]
- a. A ~~fuel oil~~ **Jet A fuel** consumption meter or other method acceptable to the Division to measure fuel oil fired (in gallons). Data shall be recorded as needed to ensure reliable and accurate monthly totals.
- 5.2.5 The Permittee shall, each Ozone season, beginning May 1, 2005, monitor emissions of Nitrogen oxides (NOx) from each IC engine in Equipment Groups EG00 and PSG0 **that cannot meet the definition of "Emergency standby stationary engine" found in Georgia Rule 391-3-1-.02(2)(mmm)4**, using the following protocol: [391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]
- g. **For emergency standby generator engines, submit written documentation to the Division (certification by a Responsible Official) that the particular IC engine will only operate in accordance with Georgia Rule 391-3-1-.02(2)(mmm)4(i) during the ozone season to avoid the applicable monitoring requirements noted in Condition 5.2.5. Such documentation must be received by the Division on or before July 31, 2004.**

- 5.2.6 ~~The Permittee may submit written documentation to the Division (certification by a Responsible Official) that the particular IC engine will only operate in accordance with Georgia Rule 391-3-1-.02(2)(mmm)4(i) during the ozone season to avoid the applicable monitoring requirements noted in Condition 5.2.5. Such documentation must be received by the Division on or before July 31, 2004. [391-3-1-.02(6)(b)1]~~
- 6.1.7 For the purpose of reporting excess emissions, exceedances, or excursions in the report required in Condition 6.1.4, the following excess emissions, exceedances, and excursions shall be reported:
[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]
- b. Exceedances: (means for the purpose of this Condition and Condition 6.1.4, any condition that is detected by monitoring or record keeping that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) do not meet the applicable emission limitation or standard consistent with the averaging period specified for averaging the results of the monitoring)
- ii. Any total twelve consecutive month ~~fuel oil (including Jet A fuel)~~ **Jet A fuel** consumption in the boilers in Equipment Group B000 which exceeds 500,000 gallons.
 - iii. Any twelve consecutive month total ~~fuel oil (including Jet A fuel)~~ **Jet A fuel** consumption in the boiler with emission unit ID SB04 which exceeds 743,000 gallons.
 - v. Any twelve consecutive month total ~~fuel oil (including Jet A fuel)~~ **Jet A fuel** consumption in the boiler with emission unit ID SB05 which exceeds 578,000 gallons.
 - vii. Any twelve consecutive month total ~~fuel oil (including Jet A fuel)~~ **Jet A fuel** consumption in the boiler with emission unit ID SB06 which exceeds 578,000 gallons.
 - x. Any time ~~fuel oil~~ **Jet A fuel** fired in boilers SB04, SB05, or SB06 has a sulfur content which exceeds 0.3 percent, by weight.
 - xi. Any time ~~fuel oil~~ **Jet A fuel** fired in boilers in Equipment Group B000 has a sulfur content which exceeds 0.5 percent, by weight
 - xii. Any time ~~fuel oil~~ **Jet A fuel and/or No.2 Fuel oil** fired in generators in Equipment Groups EG00 or PSG0 has a sulfur content which exceeds 2.5 percent, by weight.
- 6.2.2 The Permittee shall notify the Division in writing in the event of a natural gas curtailment ~~during the ozone season~~ **from** April 1 through October 31. This notification shall be postmarked within ten days after the curtailment is over and shall include the length of curtailment and the quantity and type of emergency fuel burned. [391-3-1-.02(2)(yy)]

- 6.2.4 The Permittee shall retain monthly records specifying the quantity of ~~fuel oil~~ **Jet A fuel** (gallons) and natural gas (million cubic feet) burned in each boiler in Equipment Group B000. These records shall be available for inspection or submittal to the Division upon request. [391-3-1-.02(6)(b)1, 40 CFR 70.6(c)(3)i, NAA/NSR Avoidance, 40 CFR 60.48c(g) and Alternative Monitoring of Fuel Consumption under NSPS Subpart Dc, approved by US EPA Region 4 on August 14, 1996]
- 6.2.5 The Permittee shall retain the following monthly records:
- The quantity (in million cubic feet) of natural gas consumed by each boiler with emission unit ID Nos. SB04, SB05, and SB06.
 - The quantity (in gallons) of ~~fuel oil (including Jet A fuel)~~ **Jet A fuel** consumed by each boiler with emission unit ID Nos. SB04, SB05, and SB06.

These records shall be maintained in a format suitable and available for inspection and submittal. [PSD Avoidance; NAA/NSR Avoidance, and Alternative Monitoring of Fuel Consumption under NSPS Subpart Dc, approved by US EPA Region 4 on August 14, 1996]

- 6.2.6 The Permittee shall use the records of the monthly quantity of ~~fuel oil (including Jet A fuel)~~ **Jet A fuel** required in Condition 6.2.5 to calculate and record the twelve consecutive month total quantity of ~~fuel oil (including Jet A fuel)~~ **Jet A fuel** from each boiler with emission unit ID Nos. SB04, SB05, and SB06. The twelve consecutive month total shall be calculated each month by adding that month's quantity of ~~fuel oil (including Jet A fuel)~~ **Jet A fuel** to the monthly quantity from the previous eleven months. These records (including calculations) shall be maintained in a format suitable and available for inspection and submittal. [NAA/NSR Avoidance, PSD Avoidance for SO₂, 391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]
- 6.2.7 The Permittee shall use the records of the monthly quantity of ~~fuel oil (including Jet A fuel)~~ **Jet A fuel** required in Condition 6.2.4 to calculate and record the twelve consecutive month total quantity of ~~fuel oil (including Jet A fuel)~~ **Jet A fuel** from the boilers in Equipment Group B000 on a combined basis. The twelve consecutive month total shall be calculated each month by adding that month's quantity of ~~fuel oil (including Jet A fuel)~~ **Jet A fuel** to the monthly quantity from the previous eleven months. These records (including calculations) shall be maintained in a format suitable and available for inspection and submittal. [PSD Avoidance for SO₂; 391-3-1-.02(6)(b)1 and 40 CFR 70.6(c)(3)(i)]
- 6.2.8 ~~For each shipment of Jet A fuel oil,~~ **For each quarterly period that Jet A fuel is received** for use in the emission units in Equipment Group SB00, B000, EG00, or PSG0, the Permittee shall obtain from the fuel supplier a statement that the fuel complies with the specifications for Jet A as defined by the American Society for Testing and Materials in ASTM D1655 - "Standard Specifications for Aviation Turbine Fuels." [40 CFR 60.48c(e) and (f) - (for SB00 and B000), 391-3-1-.02(6)(b)1, and 40 CFR 70.6(a)(3)]

- 6.2.9 ~~For each shipment of fuel oil, other than Jet A,~~ **For each quarterly period that No. 2 fuel oil is received** for use in the emission units in Equipment Group EG00 or PSG0, the Permittee shall obtain from the fuel supplier a statement that the fuel complies with the specifications for Number 2 fuel oil as defined by the American Society for Testing and Materials in ASTM D396 - "Standard Specifications for Fuel Oils."

~~[40 CFR 60.48c(e) and (f) (for B000), 391-3-1-.02(6)(b)1, and 40 CFR 70.6(a)(3)]~~

- 6.2.10 The Permittee shall use the monthly records required in Condition Nos. 6.2.3 and 6.2.4 to compute and record the monthly NOx emissions (tons) from Equipment Groups B000 and PSG0 on a combined basis. These records shall be available for inspection or submittal to the Division upon request. Monthly NOx emissions (tons) shall be computed using the following equation:

[NAA/NSR Avoidance, 391-3-1-.03(6)(b)1 and 40 CFR 70.6(c)(3)(i)]

$$E = (140 \mathbf{100} * NG + 0.020 * FO + 0.024 * BGEN)/2000$$

Where:

E = NOx emissions (tons) for the month.

NG = The amount of natural gas (in million cubic feet) burned in Equipment Group B000 for the month.

FO = The amount of ~~distillate fuel oil~~ **Jet A fuel** (in gallons) burned in Equipment Group B000 **on a combined basis** for the month.

BGEN = The number of horsepower-hours generated by emission units in Equipment Group PSG0 for the month. Each emission units monthly horsepower-hours shall be calculated by multiplying the actual hours of operation for that source by its maximum engine power output.

Emission Factor ~~140-100~~ = ~~140-100~~ pounds of NOx per million cubic feet of natural gas.

Emission Factor 0.020 = 0.020 pounds of NOx per gallon of ~~fuel oil~~ **Jet A fuel**.

Emission Factor 0.024 = 0.024 pounds of NOx per horsepower – hour.

- 6.2.12 The Permittee shall calculate and record the monthly NOx emissions from boiler SB04 using the applicable NOx emission factor and fuel usage records for each month of boiler operation. These records (including calculations) shall be maintained in a format suitable and available for inspection and submittal. Monthly NOx emissions shall be calculated using the following equation:

[NAA/NSR Avoidance, 391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

$$E = [(NG*EF_{ng}) + (OIL*0.15 \text{ lb/MMBtu})]/[2000 \text{ lb/ton}]$$

Where:

E = Monthly NOx emissions (tons) from boiler SB04

NG = Monthly natural gas usage (in MMBtu heat input)

EF_{ng} = applicable natural gas emission factor (greater of 0.011 lb/MMBtu or the emission factor derived from performance tests required in Condition 4.2.1

OIL = Monthly ~~fuel oil~~ **Jet A fuel** usage (in MMBtu heat input)

- 6.2.13 The Permittee shall calculate and record the monthly NOx emissions from boiler SB05 using the applicable NOx emission factor and fuel usage records for each month of boiler operation. These records (including calculations) shall be maintained in a format suitable and available for inspection and submittal. Monthly NOx emissions shall be calculated using the following equation:

[NAA/NSR Avoidance, 391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

$$E = [(NG * EF_{ng}) + (OIL * 0.15 \text{ lb/MMBtu})] / [2000 \text{ lb/ton}]$$

Where:

E = Monthly NOx emissions (tons) from boiler SB05

NG = Monthly natural gas usage (in MMBtu heat input)

EF_{ng} = applicable natural gas emission factor (greater of 0.011 lb/MMBtu or the emission factor derived from performance tests required in Condition 4.2.2)

OIL = Monthly ~~fuel oil~~ **Jet A fuel** usage (in MMBtu heat input)

- 6.2.14 The Permittee shall calculate and record the monthly NOx emissions from boiler SB06 using the applicable NOx emission factor and fuel usage records for each month of boiler operation. These records (including calculations) shall be maintained in a format suitable and available for inspection and submittal. Monthly NOx emissions shall be calculated using the following equation:

[NAA/NSR Avoidance, 391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

$$E = [(NG * EF_{ng}) + (OIL * 0.15 \text{ lb/MMBtu})] / [2000 \text{ lb/ton}]$$

Where:

E = Monthly NOx emissions (tons) from boiler SB06

NG = Monthly natural gas usage (in MMBtu heat input)

EF_{ng} = applicable natural gas emission factor (greater of 0.011 lb/MMBtu or the emission factor derived from performance tests required in Condition 4.2.3)

OIL = Monthly ~~fuel oil~~ **Jet A fuel** usage (in MMBtu heat input)

- 6.2.19 The following records shall be submitted as part of the reporting requirement of Condition 6.1.7.
- g. ~~Fuel oil (other than Jet A)~~ **No. 2 Fuel oil** certifications for **No. 2** fuel oil burned in the emission units in Equipment Group EG00, and PSG0 and a statement signed by a Part 70 responsible official of the affected facility that the records of fuel supplier certifications submitted represent all of the **No. 2** fuel oil was not burned during the quarter, the report should state that no **No. 2** fuel oil was burned during the quarter.

- 7.6.1 The Permittee shall maintain records of the duration and frequency of the following Short-term Activities:
- a. Application of ~~ethylene~~ **propylene** glycol-based de-icing/anti-icing fluid to runways, taxiways, and rampways during potential icing events.
 - b. Application of asphalt concrete to runways, taxiways, and rampways as needed to maintain safe operations.
 - c. Application of concrete stain (coating) to runways, taxiways, and rampways as needed to maintain safe operations.

These activities shall be conducted without unreasonably interfering with the enjoyment of life or use of property in any affected area of this State.

[391-3-1-.02(2)(a)1]

7.12 Revocation of Existing Permits and Amendments

The following Air Quality Permits, Amendments, and 502(b)10 are subsumed by this permit and are hereby revoked:

Air Quality Permit and Amendment Number(s)	Dates of Original Permit or Amendment Issuance
4581-063-0030-V-01-0	5/08/1998 6/08/1998
4581-063-0030-V-01-1	11/12/2003