

Facility Name: **Hammond Steam-Electric Generating Plant**

City: Coosa

County: Floyd

AIRS #: 04-13-115-00003

Application #: 17926

Date SIP Application Received:

Date Title V Application Received: January 15, 2008

Permit No: 4911-115-0003-V-02-4

Program	Review Engineers	Review Managers
SSPP	Renee Browne	Michelle Keith
SSCP	Dave Sheffield	Deanna Oser
ISMP	Pierre Sanon	James Eason
TOXICS	N/A	N/A

Introduction

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

I. Facility Description

A. Existing Permits

Table 1 below lists the current Title V permit, and all administrative amendments, minor and significant modifications to that permit, and 502(b)(10) attachments. Comments are listed in Table 2 below.

Table 1: Current Title V Permit and Amendments

Permit/Amendment Number	Date of Issuance	Comments	
		Yes	No
4911-115-0003-V-02-0	11/15/05	✓	
4911-115-0003-V-02-1	January 31, 2006	✓	
4911-115-0003-V-02-2	December 20, 2006	✓	
4911-115-0003-V-02-3	March 7, 2007		✓

Table 2: Comments on Specific Permits

Permit Number	Comments
4911-115-0003-V-02-0	Effective date January 1, 2006
4911-115-0003-V-02-1	Added wet limestone Flue Gas Desulfurization scrubber. Also added a Materials Handling System.
4911-115-0003-V-02-2	Changes made due to public comments on Amendment No. 4911-115-0003-V-02-1. Amendment No. 4911-115-0003-V-02-1 revoked with issuance of this amendment.
4911-115-0003-V-02-3	Incorporate changes made to Georgia Rule for Air Quality Control 391-3-1-.02(2)(jjj) passed by the Georgia Department of Natural Resources Board on December 6, 2006.

B. Regulatory Status

1. PSD/NSR/RACT

This facility is a major source under PSD because it has potential emissions of PM, SO₂, and CO greater than 100 tpy (it is one of the 28 named source categories under PSD). It was originally constructed before the PSD regulations were effective.

2. Title V Major Source Status by Pollutant

Table 3: Title V Major Source Status

Pollutant	Is the Pollutant Emitted?	If emitted, what is the facility's Title V status for the Pollutant?		
		Major Source Status	Major Source Requesting SM Status	Non-Major Source Status
PM	✓	✓		
PM ₁₀	✓	✓		
SO ₂	✓	✓		
VOC	✓			✓
NO _x	✓	✓		
CO	✓	✓		
TRS	✓			✓
H ₂ S	✓			✓
Individual HAP	✓	✓		
Total HAPs	✓	✓		

II. Proposed Modification

A. Description of Modification

Modification of Conditions 3.4.6 thru 3.4.9 of permit no. 4911-115-00003-V-02-0 to establish one ozone season NO_x target for the scrubber stack, which has one common liner for Units 1-4, that is equivalent to the two ozone season NO_x targets for the existing stack, which has a liner for Units 1-3 and one for Unit 4. Modification of Condition 5.2.1 to include Source 3, comprised of electric utility steam generating units with emission unit ID Nos. SG01, SG02, SG03, and SG04, combined exhaust, located in the 675 foot stack. Removal of Condition 6.2.12 so that analyses of compliant fuel use need not be reported quarterly. Analyses showing non-compliant results will continue to be reported quarterly and complete fuel use and analyses records will continue to be maintained, as required by the permit. This change will make the Hammond permit consistent with other Georgia Power permits.

B. Emissions Change

Table 4: Emissions Change Due to Modification

Pollutant	Is the Pollutant Emitted?	Net Actual Emissions Increase (Decrease) (tpy)	Net Potential Emissions Increase (Decrease) (tpy)
PM	Yes	0	0
PM ₁₀	Yes	0	0
SO ₂	Yes	0	0
VOC	Yes	0	0
NO _x	Yes	(-29)	(-29)
CO	Yes	0	0
TRS	Yes	0	0
H ₂ S	Yes	0	0
Individual HAP	Yes	0	0
Total HAPs	Yes	0	0

C. PSD/NSR Applicability

The proposed modification is not subject to review under 40 CFR 52, Prevention of Significant Deterioration (PSD) as discussed in Part IV.C of this narrative.

IV. Regulated Equipment Requirements

B. Equipment List for the Process

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), (jjj), and Acid Rain	3.2.1, 3.2.2, 3.2.3, 3.4.1, 3.4.2, 3.4.3, 3.4.6, 3.4.8, 3.4.9, Section 7.9	EP01 FGD1	Electrostatic Precipitator FGD
SG02	Steam Generator Unit 2	391-3-1-.02(2)(b), (d), (g), (jjj), and Acid Rain	See SG01	EP02 FGD1	Electrostatic Precipitator FGD
SG03	Steam Generator Unit 3	391-3-1-.02(2)(b), (d), (g), (jjj), and Acid Rain	See SG01	EP03 FGD1	Electrostatic Precipitator FGD
SG04	Steam Generator Unit 4	391-3-1-.02(2)(b), (d), (g), (jjj), and Acid Rain	3.2.1, 3.2.2, 3.2.3, 3.4.1, 3.4.2, 3.4.3, 3.4.6, 3.4.8, 3.4.9, Section 7.9	EP04 SCR4 FGD1	Electrostatic Precipitator Selective Catalytic Reduction FGD
CHS	Coal Handling System	391-3-1-.02(2)(n)	3.4.4, 3.4.5	none	n/a
AHS	Ash Handling System	391-3-1-.02(2)(n)	3.4.4, 3.4.5	none	n/a
MHS	Materials Handling System	391-3-1-.02(2)(n)	3.4.4, 3.4.5	none	n/a

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

C. Equipment & Rule Applicability

Applicable Rules and Regulations -

GASC 391-3-1-.02(2)(jjj) NO_x Emissions from Electric Utility Steam Generating Units currently applies to HRSG (Heat Steam Recovery Generator) Units 1-4. The facility wants to establish one ozone season NO_x target for the scrubber stack, which has one common liner for Units 1-4, that is equivalent to the current two ozone season NO_x targets for the existing stack, which has a liner for Units 1-3 and one for Unit 4 as presented in the current permit no. 4911-115-0003-V-02-0.

D. Compliance Status

The facility is currently in compliance.

E. Operational Flexibility

There are no changes in operational flexibility associated with this modification.

F. Permit Conditions

Permit Condition 3.4.6 was modified to provide one NO_x target for all four units (ID SG01, SG02, SG03 and SG04) that reflects the existing two NO_x targets.

Permit Condition 3.4.7 was removed and the condition number will be reserved.

Permit Conditions 3.4.8 and 3.4.9 were modified to remove the reference to condition number 3.4.7.

V. Testing Requirements (with Associated Record Keeping and Reporting)

A. Individual Equipment:

There are no changes in testing requirements.

VI. Monitoring Requirements (with Associated Record Keeping and Reporting)

Condition 5.2.1 a, and b will be modified to reflect all four units (ID SG01, SG02, SG03 and SG04) vent to one combined stack.

Condition 5.2.1 c will be modified as the second paragraph will be assigned Condition 5.2.1.d and assigns the identifier Source 3 to the scrubber exhaust stack from units SG01, SG02, SG03 and SG04.

The CAM plan for the new Source 3 will not be addressed with this amendment.

VII. Other Record Keeping and Reporting Requirements

Condition 6.2.9 is modified to remove the reference to condition number 3.4.7.

Condition 6.2.12 is deleted so that analyses of compliant fuel use need not be reported quarterly.

Addendum to Narrative

The 30-day public review started on May 1, 2008 and ended on June 02, 2008. Comments were not received by the Division.