

TITLE V ADMINISTRATIVE AMENDMENT APPLICATION REVIEW

Facility Name: **Chattahoochee Energy Facility**

City: Franklin

County: Heard

AIRS #: 04-13-149-00006

Application #: 13512

Date Title V Application Received: January 2, 2002 and April 1, 2003 (13512)

Permit No: 4911-149-0006-V-02-0

| Program | Review Engineer | Review Manager |
|--|------------------------|-----------------------|
| SSPP | Susan Jenkins | James Capp |
| ISMP (for increased monitoring) | Not Applicable | Not Applicable |

Introduction

This narrative is being provided to assist the reader in understanding the content of the 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 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.

I. Facility Description

A. Existing Permits

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

Table 1: Current Title V Permit and Amendments

| Permit/Amendment Number | Date of Issuance | Comments | |
|-------------------------|-------------------|----------|----|
| | | Yes | No |
| 4911-149-0006-V-01-0 | January 15, 2002 | X | |
| 4911-149-0006-V-01-1 | February 14, 2003 | X | |

Table 2: Comments on Specific Permits

| Permit Number | Comments |
|----------------------|---|
| 4911-149-0006-V-01-0 | Construction and Part 70 Permit for Power Block 8 at Plant Wansley. Equipment was originally permitted under the name of Georgia Power – Plant Wansley. |
| 4911-149-0006-V-01-1 | Minor Modification without Construction for the revision of Condition Nos. 3.3.14.a, 3.3.14.b, and 6.1.7.b.viii and the addition of Condition 8.23.1. |

B. Regulatory Status

1. PSD/NSR

The Wansley Steam-Electric Generating Plant (AFS No. 149-00001), the Chattahoochee Energy Facility (AFS No. 149-00006), and the Municipal Electric Authority of Georgia – Wansley Unit 9 (AFS No. 149-00007) comprise the same Title I and Title V site. The Title I site is a major source under the PSD/NSR regulations because potential emissions of NO_x exceed 100 tons per year. Note: The Title I site is classified as one of the 28 named source categories under PSD – *Fossil-fuel boilers (or combination thereof) totaling more than 250 MMBtu per hour heat input.*

2. Title V Major Source Status by Pollutant: The following table illustrates the potential to emit for the entire Title V site.

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 | X | X | | |
| PM ₁₀ | X | X | | |
| SO ₂ | X | X | | |
| VOC | X | X | | |
| NO _x | X | X | | |
| CO | X | X | | |
| TRS | N/A | | | N/A |
| H ₂ S | N/A | | | N/A |

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 |
| Individual HAP | X | X | | |
| Total HAPs | X | X | | |

II. Proposed Amendment

A. Description of Amendment

Oglethorpe Power Corporation (OPC) submitted notification to EPD (dated December 28, 2001 and received January 2, 2002) of a change in name and ownership of the Wansley Combined Cycle Energy Facility (WCCEF) located at the existing Wansley Steam-Electric Generating Plant in Heard County, Georgia. As of December 28, 2001 the new owner was Chattahoochee EMC and the new facility name was “Chattahoochee Energy Facility.” EPD acknowledged receipt of the application in a letter to OPC dated January 11, 2002. OPC’s December 28, 2001 letter failed to provide the information required by 40 CFR 70.7(d)(1)(iv) for a Part 70 Administrative Amendment encompassing a change in ownership. With this in mind, EPD noted in the January 11, 2002 letter that, “Since the modification includes the request for a change of ownership, you must submit a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new permittee.” OPC submitted the requested information in a letter to EPD dated July 8, 2002.

OPC notified EPD, later in the summer of 2002, that ownership of the WCCEF would revert back to OPC from Chattahoochee EMC. Thus, EPD delayed issuance of the name change/ownership change until OPC could verify the date of such transfer. OPC submitted a letter to EPD, dated March 28, 2003 stating that the transfer in ownership of WCCEF from Chattahoochee EMC to OPC would occur in the next 30 days. OPC notes that the name of the facility will not be WCCEF but Chattahoochee Energy Facility.

Application No. 13512 is processed as a Title V Administrative Amendment for a change in the name of the facility from WCCEF to Chattahoochee Energy Facility.

Note: Please note that the facility address will change as a result of this name change. The address in the existing permit and amendment for the WCCEF is the address for the Plant Wansley coal plant, which is Roopville. As construction of WCCEF got underway, OPC got an address from the post office for their mail. The post office assigned “3461 Hollingsworth Ferry Road, Franklin, Georgia 30217” as the facility location address for the WCCEF. It is important to note that Plant Wansley has two gates – one of the northeast side of the plant (closer to Roopville) and one on the southwest side of the plant (closer to Franklin). The WCCEF is closer to the southwest plant entrance on the northeast side. The physical location of the WCCEF has not changed.

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- B. Emission and Operating Caps: Not Applicable.
- C. Monitoring and Recordkeeping: Not Applicable.
- D. Permit Conditions

Sections 1.1, 1.2, and 1.3 are updated to reflect the new name of the facility.