

Facility Name: **Transco Compressor Station 120**
 City: Stockbridge
 County: Henry
 AIRS #: 04-13-151-00025

Application #: TV-17155
 Date Application Received: December 15, 2006
 Permit No: 4922-151-0025-V-02-0

| Program | Review Engineers | Review Managers |
|----------------|-------------------------|------------------------|
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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 **Transco Compressor Station 120** 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:

Transco Compressor Station 120

2. Parent/Holding Company Name

Transcontinental Gas Pipe Line Corporation

3. Previous and/or Other Name(s)

No previous names have been identified.

4. Facility Location

683 Valley Hill Road
Stockbridge, Georgia 30281

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

This facility is located in the Atlanta 8-hour ozone nonattainment area as well as the Atlanta PM 2.5 nonattainment area. This facility is also in a former 1-hour ozone nonattainment area, which is subject to more stringent New Source Review rules than the areas in the 8-hour ozone standard nonattainment area.

B. Site Determination

There are no other facilities which could possibly be contiguous or adjacent and under common control.

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 |
|--|--------------------------------|--------------------------------------|
| 4922-151-0025-V-01-0 | June 26, 2002 | Initial Title V permit |
| 4922-151-0025-V-01-1 | September 14, 2004 | Clarify two conditions |
| 4922-151-0025-V-01-2 | April 11, 2006 | Revision to PSD avoidance conditions |

D. Process Description

1. SIC Codes(s)

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The SIC Code(s) identified above were assigned by EPD's Air Protection Branch for purposes pursuant to the Georgia Air Quality Act and related administrative purposes only and are not intended to be used for any other purpose. Assignment of SIC Codes by EPD's Air Protection Branch for these purposes does not prohibit the facility from using these or different SIC Codes for other regulatory and non-regulatory purposes.

Should the reference(s) to SIC Code(s) in any narratives or narrative addendum previously issued for the Title V permit for this facility conflict with the revised language herein, the language herein shall control; provided, however, language in previously issued narratives that does not expressly reference SIC Code(s) shall not be affected.

2. Description of Product(s)

This facility is a Natural Gas Compressor Station. It does not make a "product."

3. Overall Facility Process Description

Transcontinental Gas Pipe Line Corporation operates several compressor stations in Georgia and adjacent states. These compressor stations, also referred to as pump stations or boost stations, are located along the Transco gas transmission line. Natural gas internal combustion engines are used to drive compressor pumps which move the gas through the transmission line.

4. Overall Process Flow Diagram

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

E. Regulatory Status

1. PSD/NSR

This facility is currently classified as a major source, according to PSD regulations, because it has potential emissions of NO_x, CO, and VOC greater than 250 tons per year (it is not one of the 28 named source categories under PSD). For the combustion turbine with source code T1, Transco has accepted a PSD avoidance limit of 4,400 hours of operation per year and 18.0 pounds of NO_x per hour (Conditions 3.2.1 and 3.2.2). The facility is a major source under the nonattainment provisions of NSR because it has potential emissions of NO_x greater than 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 | ✓ | | | ✓ |
| PM ₁₀ | ✓ | | | ✓ |
| SO ₂ | ✓ | | | ✓ |
| VOC | ✓ | ✓ | | |
| NO _x | ✓ | ✓ | | |
| CO | ✓ | ✓ | | |
| TRS | ✓ | | | ✓ |
| H ₂ S | ✓ | | | ✓ |
| Individual HAP | ✓ | ✓ | | |
| Total HAPs | ✓ | ✓ | | |

3. MACT Standards

The facility is a major source for single HAP and combined HAPs because each PTE for acetaldehyde, acrolein, and formaldehyde is greater than 10 tpy, respectively, and the PTE for combined HAPs is greater than 25 tpy.

Turbine Solar Centaur (ID No. T1) is subject to 40 CFR 63, Subpart YYYY – “National Emission Standards for Hazardous Air Pollutants for Stationary Combustion Turbines.” Turbine T1 is an existing unit and does not have to meet any of the requirements of this Subpart or Subpart A, per 40 CFR 63.6090(b)(4). Not even initial notification is required for an existing stationary combustion turbine.

Mainline Units 1 through 15 (ID Nos. ML01 – ML15) are subject to 40 CFR 63, Subpart ZZZZ – “National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines.” These engines meet the definition of existing spark ignition 2 stroke lean burn (2SLB) engines. Existing 2SLB engines do not have to meet any of the requirements of this Subpart or Subpart A, per 40 CFR 63.6590(b)(3). Not even initial notification is required for an existing 2SLB engine.

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 | no |
| Program Code M – Part 63 NESHAP | yes |
| Program Code V – Title V | yes |

Regulatory Analysis

II. Facility Wide Requirements

- A. Emission and Operating Caps:
None applicable.
- B. Applicable Rules and Regulations
None applicable.
- C. Compliance Status
None applicable.
- D. Operational Flexibility
None applicable.
- E. Permit Conditions
None applicable.

III. Regulated Equipment Requirements

A. Brief Process Description

This plant is one of several compressor stations that Transcontinental Gas Pipe Line Corporation operates in North Georgia and adjacent states. These compressor stations, also referred to as pump stations or boost stations, are located along the Transco gas transmission line. Natural gas fueled combustion engines are used to drive compressor pumps which move the gas through the transmission line.

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 |
| ML01 | Mainline Unit No.1 | 391-3-1-.02(2)(b)1, 391-3-1-.02(2)(g)2, 391-3-1-.02(2)(tt), 391-3-1-.02(2)(yy), 40 CFR 63 Subpart ZZZZ Atlanta Ozone Attainment SIP | 3.3.4, 3.4.1, 3.4.2, 3.4.3, 5.2.2, 5.2.5, 6.1.7, 6.2.3 | None | None |
| ML02 | Mainline Unit No.2 | 391-3-1-.02(2)(b)1, 391-3-1-.02(2)(g)2, 391-3-1-.02(2)(tt), 391-3-1-.02(2)(yy), 40 CFR 63 Subpart ZZZZ Atlanta Ozone Attainment SIP | 3.3.4, 3.4.1, 3.4.2, 3.4.3, 5.2.2, 5.2.5, 6.1.7, 6.2.3 | None | None |
| ML03 | Mainline Unit No.3 | 391-3-1-.02(2)(b)1, 391-3-1-.02(2)(g)2, 391-3-1-.02(2)(tt), 391-3-1-.02(2)(yy), 40 CFR 63 Subpart ZZZZ Atlanta Ozone Attainment SIP | 3.3.4, 3.4.1, 3.4.2, 3.4.3, 5.2.2, 5.2.5, 6.1.7, 6.2.3 | None | None |
| ML04 | Mainline Unit No.4 | 391-3-1-.02(2)(b)1, 391-3-1-.02(2)(g)2, 391-3-1-.02(2)(tt), 391-3-1-.02(2)(yy), 40 CFR 63 Subpart ZZZZ Atlanta Ozone Attainment SIP | 3.3.4, 3.4.1, 3.4.2, 3.4.3, 5.2.2, 5.2.5, 6.1.7, 6.2.3 | None | None |
| ML05 | Mainline Unit No.5 | 391-3-1-.02(2)(b)1, 391-3-1-.02(2)(g)2, 391-3-1-.02(2)(tt), 391-3-1-.02(2)(yy), 40 CFR 63 Subpart ZZZZ Atlanta Ozone Attainment SIP | 3.3.4, 3.4.1, 3.4.2, 3.4.3, 5.2.2, 5.2.5, 6.1.7, 6.2.3 | None | None |
| ML06 | Mainline Unit No.6 | 391-3-1-.02(2)(b)1, 391-3-1-.02(2)(g)2, 391-3-1-.02(2)(tt), 391-3-1-.02(2)(yy), 40 CFR 63 Subpart ZZZZ Atlanta Ozone Attainment SIP | 3.3.4, 3.4.1, 3.4.2, 3.4.3, 5.2.2, 5.2.5, 6.1.7, 6.2.3 | None | None |
| ML07 | Mainline Unit No.7 | 391-3-1-.02(2)(b)1, 391-3-1-.02(2)(g)2, 391-3-1-.02(2)(tt), 391-3-1-.02(2)(yy), 40 CFR 63 Subpart ZZZZ Atlanta Ozone Attainment SIP | 3.3.4, 3.4.1, 3.4.2, 3.4.3, 5.2.2, 5.2.5, 6.1.7, 6.2.3 | None | None |

| Emission Units | | Specific Limitations/Requirements | | Air Pollution Control Devices | |
|----------------|-----------------------|--|--|-------------------------------|-------------|
| ID No. | Description | Applicable Requirements/Standards | Corresponding Permit Conditions | ID No. | Description |
| ML08 | Mainline Unit No.8 | 391-3-1-.02(2)(b)1, 391-3-1-.02(2)(g)2, 391-3-1-.02(2)(tt), 391-3-1-.02(2)(yy), 40 CFR 63 Subpart ZZZZ Atlanta Ozone Attainment SIP | 3.3.4, 3.4.1, 3.4.2, 3.4.3, 5.2.2, 5.2.5, 6.1.7, 6.2.3 | None | None |
| ML09 | Mainline Unit No.9 | 391-3-1-.02(2)(b)1, 391-3-1-.02(2)(g)2, 391-3-1-.02(2)(tt), 391-3-1-.02(2)(yy), 40 CFR 63 Subpart ZZZZ Atlanta Ozone Attainment SIP | 3.3.4, 3.4.1, 3.4.2, 3.4.3, 5.2.2, 5.2.5, 6.1.7, 6.2.3 | None | None |
| ML10 | Mainline Unit No.10 | 391-3-1-.02(2)(b)1, 391-3-1-.02(2)(g)2, 391-3-1-.02(2)(tt), 391-3-1-.02(2)(yy), 40 CFR 63 Subpart ZZZZ Atlanta Ozone Attainment SIP | 3.3.4, 3.4.1, 3.4.2, 3.4.3, 5.2.2, 5.2.5, 6.1.7, 6.2.3 | None | None |
| ML11 | Mainline Unit No.11 | 391-3-1-.02(2)(b)1, 391-3-1-.02(2)(g)2, 391-3-1-.02(2)(tt), 391-3-1-.02(2)(yy), 40 CFR 63 Subpart ZZZZ Atlanta Ozone Attainment SIP | 3.3.4, 3.4.1, 3.4.2, 3.4.3, 5.2.2, 5.2.5, 6.1.7, 6.2.3 | None | None |
| ML12 | Mainline Unit No.12 | 391-3-1-.02(2)(b)1, 391-3-1-.02(2)(g)2, 391-3-1-.02(2)(tt), 391-3-1-.02(2)(yy), 40 CFR 63 Subpart ZZZZ Atlanta Ozone Attainment SIP | 3.3.4, 3.4.1, 3.4.2, 3.4.3, 5.2.2, 5.2.5, 6.1.7, 6.2.3 | None | None |
| ML13 | Mainline Unit No.13 | 391-3-1-.02(2)(b)1, 391-3-1-.02(2)(g)2, 391-3-1-.02(2)(tt), 391-3-1-.02(2)(yy), 40 CFR 63 Subpart ZZZZ Atlanta Ozone Attainment SIP | 3.3.4, 3.4.1, 3.4.2, 3.4.3, 5.2.2, 5.2.5, 6.1.7, 6.2.3 | None | None |
| ML14 | Mainline Unit No.14 | 391-3-1-.02(2)(b)1, 391-3-1-.02(2)(g)2, 391-3-1-.02(2)(tt), 391-3-1-.02(2)(yy), 40 CFR 63 Subpart ZZZZ Atlanta Ozone Attainment SIP | 3.3.4, 3.4.1, 3.4.2, 3.4.3, 5.2.2, 5.2.5, 6.1.7, 6.2.3 | None | None |
| ML15 | Mainline Unit No.15 | 391-3-1-.02(2)(b)1, 391-3-1-.02(2)(g)2, 391-3-1-.02(2)(tt), 391-3-1-.02(2)(yy), 40 CFR 63 Subpart ZZZZ Atlanta Ozone Attainment SIP | 3.3.4, 3.4.1, 3.4.2, 3.4.3, 5.2.2, 5.2.5, 6.1.7, 6.2.3 | None | None |
| T1 | Turbine Solar Centaur | 391-3-1-.02(2)(b)1, 391-3-1-.02(2)(g)2, 391-3-1-.02(2)(tt), 391-3-1-.02(2)(yy), 40 CFR 60 Subpart A, 40 CFR 60 Subpart GG, 40 CFR 63 Subpart YYYY PSD avoidance | 3.2.1, 3.2.2, 3.3.1, 3.3.2, 3.3.3, 3.4.1, 3.4.2, 4.2.1, 4.2.2, 5.2.1, 5.2.3, 5.2.4, 6.1.7, 6.2.1, 6.2.2 | None | None |
| AUX1 | Generator No. 1 | 391-3-1-.02(2)(b)1, 391-3-1-.02(2)(g)2, 391-3-1-.02(2)(mmm) | 3.4.1, 3.4.4 | None | None |

| Emission Units | | Specific Limitations/Requirements | | Air Pollution Control Devices | |
|----------------|----------------------|---|---------------------------------|-------------------------------|-------------|
| ID No. | Description | Applicable Requirements/Standards | Corresponding Permit Conditions | ID No. | Description |
| AUX2 | Generator No. 2 | 391-3-1-.02(2)(b)1, 391-3-1-.02(2)(g)2, 391-3-1-.02(2)(mmm) | 3.4.1, 3.4.4 | None | None |
| AUX3 | Generator No. 3 | 391-3-1-.02(2)(b)1, 391-3-1-.02(2)(g)2, 391-3-1-.02(2)(mmm) | 3.4.1, 3.4.4 | None | None |
| AC01 | Air Compressor No. 1 | 391-3-1-.02(2)(b)1, 391-3-1-.02(2)(g)2 | 3.4.1 | None | None |
| AC02 | Air Compressor No. 2 | 391-3-1-.02(2)(b)1, 391-3-1-.02(2)(g)2 | 3.4.1 | None | None |

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

C. Equipment & Rule Applicability

See the narrative for initial Title V Permit 4922-151-0025-V-01-0 for a detailed discussion of the rule and regulations for the equipment at this facility, with the following exceptions. The narrative for Permit 4922-151-0025-V-01-2 contains the detailed discussion of the operating caps for the Turbine Solar Centaur (T1). As discussed earlier in Section I.E.3., Mainline Units 1 through 15 (ML01-ML15) are subject to the MACT standard for engines, and Turbine Solar Centaur (T1) is subject the MACT standard for turbines.

D. Compliance Status

The facility is in compliance at this time.

E. Operational Flexibility

None applicable.

F. Permit Conditions

Condition 3.2.1 limits the hours of operation for the combustion turbine (source code T1) for PSD avoidance. This condition is carried over from Condition 3.2.1 in Permit 4922-151-0025-V-01-0.

Condition 3.2.2 limits the nitrogen oxides emissions from the combustor turbine (source code T1) for PSD avoidance. This condition is carried over from Condition 3.2.2 in Permit 4922-151-0025-V-01-0.

Condition 3.3.1 specifies that the combustion turbine (source code T1) is subject to 40 CFR 60 Subpart A and 40 CFR 60 Subpart GG. This condition is carried over from Condition 3.3.1 in Permit 4922-151-0025-V-01-0.

Condition 3.3.2 contains the fuel sulfur limit for the combustion turbine (source code T1) per 40 CFR 60 Subpart GG. This condition is carried over from Condition 3.3.2 in Permit 4922-151-0025-V-01-0.

Condition 3.3.3 specifies that the combustion turbine (source code T1) is subject to 40 CFR 63 Subpart YYYY. This condition is a new requirement.

Condition 3.3.4 specifies that Mainline Units 1 through 15 (source code ML01 – ML15) are subject to 40 CFR 63 Subpart ZZZZ. This condition is a new requirement.

Condition 3.4.1 contains the opacity limit for all emission units per Georgia Rule (b). This condition is carried over from Condition 3.4.1 in Permit 4922-151-0025-V-01-0.

Condition 3.4.2 requires that units ML01 – ML15 and T1 use good combustion practices as VOC Reasonably Available Control Technology (RACT), a requirement of Georgia Rule (tt). This condition is carried over from Condition 3.4.2 in Permit 4922-151-0025-V-01-0.

Condition 3.4.3 limits the NO_x emissions from Mainline Units 1 through 15 (ML01 – ML15), per the Atlanta Ozone Attainment SIP and NO_x RACT, per Georgia Rule (yy). This condition is carried over from Condition 3.4.3 in Permit 4922-151-0025-V-01-0.

Condition 3.4.4 requires that the internal combustion powered generators (AUX1, AUX2, and AUX3) be operated as “emergency standby stationary engine” as defined in Georgia Rule (mmm). This condition is carried over from Condition 3.4.4 in Permit 4922-151-0025-V-01-0.

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 (or sixty (60) days for tests required by 40 CFR Part 63) 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

See the narrative for Permit 4922-151-0025-V-01-0 for a discussion of the testing required at this facility with the following exception. Conditions 4.2.1 and 4.2.2 in Permit 4922-151-0025-V-01-0 have been fulfilled and are no longer needed. Conditions 4.2.3 and 4.2.4 in Permit 4922-151-0025-V-01-0 have, therefore, been renumbered as 4.2.1 through 4.2.2. Condition 4.2.2 has been modified to reflect that ASTM test method D6522 should be used. Condition 4.2.5 in Permit 4922-151-0025-V-01-0, which requires monitoring of Mainline Units ML01 through ML15, has been moved to Section 5.2 of this permit as Condition 5.2.5.

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

See the narrative for Permit 4922-151-0025-V-01-0 for a discussion of the monitoring required at this facility with the following exceptions. The Centaur Turbine (source code T1) is subject to 40 CFR 60 Subpart GG. On July 8, 2004, revisions to Subpart GG were published (69 FR 41360), which, in part, revised the requirements for monitoring the sulfur content of natural gas burned in the turbine. Condition 5.2.3 has been changed to reflect the new requirement in Subpart GG, namely that the Permittee is not required to monitor fuel sulfur content of natural gas if the Permittee can demonstrate that the natural gas meets the Subpart's definition of natural gas. The Subpart specifies what sources of information may be used to make this demonstration. As discussed in Section IV.B. of this narrative, Condition 4.2.5 in Permit 4922-151-0025-V-01-0 has been moved to Condition 5.2.5 of this permit. The text of the new condition has been revised to reflect updates made to Method 7E.

C. Compliance Assurance Monitoring (CAM)

Not applicable because there are no add-on control devices at this facility.

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.

B. Specific Record Keeping and Reporting Requirements

See the narrative for Permit 4922-151-0025-V-01-0 for a discussion of the testing required at this facility with the following exceptions. The requirement to submit semiannual reports of natural gas sulfur content are no longer needed due to the changes made to 40 CFR 60 Subpart GG (see Section V.B. of this narrative). Condition 6.2.1 in Permit 4922-151-0025-V-01-0 is, therefore, no longer needed. Conditions 6.2.2 and 6.2.3 from Permit 4922-151-0025-V-01-0 have been renumbered as 6.2.1 and 6.2.2 in this permit. The requirements of Condition 6.2.4 in Permit 4922-151-0025-V-01-0 have been moved to Condition 6.1.8.

Permit 4922-151-0025-V-01-0 and its amendments define excursions for Mainline Units ML01 through ML15 as operation outside “the range (or value) demonstrated on each engine during test to meet a NO_x limit of 6.0 gm/hp-hr.” Since the actual values and ranges that assure compliance with the emission limits are not in the permit and are not found in a single document, compliance for these units has been difficult to verify. Therefore, new Condition 6.2.3 has been added, requiring an operating parameters summary document for these engines. The operating parameters summary document must contain the required ranges and values for engine speed, air manifold pressure, and engine timing based on the results from previously conducted emission tests. The excursions specified in Condition 6.1.7(c) (ii), (iii), and (iv) have, therefore, been modified to remove the specific ranges and to refer to the required operating parameters summary document.

VII. Specific Requirements

A. Operational Flexibility

Condition 7.1.2 allows the Permittee to change out certain components of Turbine T1 with refurbished equipment. The Permittee is required to notify the Division of the change out and to test the turbine with the refurbished equipment.

B. Alternative Requirements

None applicable.

C. Insignificant Activities

Refer to <http://airpermit.dnr.state.ga.us/GATV/default.asp> for the Online Title V Application.

D. Temporary Sources

None applicable.

E. Short-Term Activities

None applicable.

F. Compliance Schedule/Progress Reports

None applicable.

G. Emissions Trading

None applicable.

H. Acid Rain Requirements

None applicable.

I. Stratospheric Ozone Protection Requirements

The facility has not indicated that they are subject to Title VI.

J. Pollution Prevention

None applicable.

K. Specific Conditions

None 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

The 30-day public review started on May 9, 2008, and ended on June 9, 2008. No comments were received from the public. Comments were received by the Division on June 9, 2008, in electronic format from Transcontinental Gas Pipe Line Corporation (Transco). These comments are transcribed below, followed by the Division's responses.

Company Comment 1:

Transco requests that the language in the draft Title V Permit Condition 5.2.5 be changed to reflect the language in the existing Title V Permit Condition 4.2.5. The draft permit language is less specific in the requirements for an analyzer used to conduct the required survey of NOx emissions. In addition, Transco requests that Condition 5.2.5 in the draft Title V Permit be modified to allow the Division to approve an alternative testing protocol. The language of the Permit Condition as it is currently written is problematic for Transco, because the portable analyzer technology that Transco currently uses to conduct NOx emission testing was not designed to meet the strict standards set by Method 7E. Transco would also like to emphasize that the ECOM A Plus analyzer that Transco currently uses to conduct portable emission testing meets the requirements of the U.S. Environmental Protection Agency (EPA) Environmental Technology Verification (ETV) Program and is considered a cost-effective technology for emission testing. With these proposed changes the permit condition would read:

“Once each year during the period between May 1 through September 30, the Permittee shall conduct a survey of NOx emissions from at least one reciprocating engine in each engine group (as defined in Table 3-A). The NOx emission measurement shall be conducted using an analyzer that meets the ~~requirements~~ Analyzer Calibration Error, Sampling System Bias, Zero Drift, and Calibration Drift specifications contained in Section 4 of Method 7E in Appendix A of the Division's Procedures for Testing and Monitoring of Air Pollutants, or a by an alternative method approved by the Division. Each survey test run shall be at least 20 minutes in duration and measurements shall be made and recorded at 1-minute intervals. Zero and calibration drift tests shall be conducted using procedures of Section 7 of Method 7E, or a by an alternative protocol approved by the Division. Three test runs shall be conducted for the survey. During these tests, the Permittee shall confirm or re-establish the parameter levels that indicate proper operation of the engines in that group and assure compliance with the NOx limit of 6.0 gm/hp-hr. For engine groups comprised of two or more engines, a different engine from each engine group shall be tested each year. The testing should cycle among all the engines in the group.”

Division Response:

The Division agrees that the language in draft Condition 5.2.5 is overly restrictive for the purposes of the condition. The Division has revised this condition to specify ASTM Method D6522 or EPA Conditional Test Method CTM-030, which are more appropriate for the intended purpose of Condition 5.2.5. The analyzer specified by the Permittee meets the requirements of these methods. According to the ECOM A-Plus web page, “the unit also meets the criteria of the EPA CTM protocols for portable EC [electrochemical] based analyzers.” The Division has revised Condition 5.2.5 to read as follows:

Once each year during the period between May 1 through September 30, the Permittee shall conduct a survey of NOx emissions from at least one reciprocating engine in each engine group (as defined in Table 3-A). The NOx emission measurements shall be conducted using an analyzer that meets the requirements of ~~Method 7E in Appendix A of the Division's Procedures for Testing and Monitoring of Air Pollutants~~ American Society for Testing and Materials (ASTM) Method D6522, EPA Conditional Test Method CTM-030, or Method 7E. Each survey test run shall be at least 20 minutes in duration and measurements shall be made and recorded at 1-minute intervals. Three test runs shall be conducted for the survey. During these tests, the Permittee shall confirm or re-establish the parameter levels that indicate proper operation of the engines in that group and assure compliance with the NOx limit of 6.0 gm/hp-hr. For engine groups comprised of two or more engines, a different engine from each engine group shall be tested each year. The testing should cycle among all the engines in the group.

Company Comment 2:

Transco also requests General Testing Requirements Condition 4.1.3 be modified to allow the Division to approve alternative emission testing procedures in addition to those listed if it is demonstrated that the results from an alternative emissions testing procedure are shown to be equivalent to the Division's Procedures for Testing and Monitoring Sources of Air Pollutants.

Division Response:

In accordance with 40 CFR 70.6(c)(1), Title V permits must contain "compliance certification, testing, monitoring, reporting, and recordkeeping requirements sufficient to assure compliance with the terms and conditions of the permit." The Division does not believe that more latitude in approving alternative test procedures can be added to Condition 4.1.3. Alternative test procedures should be requested as part of a permit renewal or amendment. No changes were made in response to this comment.