

Facility Name: **Talbot Energy Facility**
 City: Box Springs
 County: Talbot
 AIRS #: 04-13-263-00013

Application #: TV-14405
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 Permit No: 4911-263-0013-V-04-0

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Toxics	N/A	N/A

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 Amendments of 1990. Section 391-3-1-.03(10) of the Georgia Rules for Air Quality Control incorporates requirements of Part 70 of Chapter I 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 **Talbot Energy Facility** 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: Talbot Energy Facility
2. Parent/Holding Company Name: Oglethorpe Power Corporation

Oglethorpe Power Corporation owned the facility from August 9, 2001, to May 8, 2002. Talbot EMC owned the facility from May 8, 2002 to June 9, 2003. Ownership of the Facility reverted back to Oglethorpe Power Corporation on June 9, 2003.

3. Previous and/or Other Name(s)

This facility has always been known as Talbot Energy Facility.

4. Facility Location

9125 Cartledge Road, Box Springs, GA 31801 (Talbot County)

5. Attainment or Non-attainment Area Location

The facility currently is located in an attainment area. Talbot County is designated by the U.S. EPA as "attainment" or "unclassifiable" for all criteria pollutants.

6. Class I Area Impacts

The nearest PSD Class I area is more than 240 km away.

B. Site Determination

There are no other sources or facilities under Permittee's common control that are adjacent to or contiguous with the subject facility. No site determination issues exist for the Talbot Energy Facility site.

C. Existing Permits

Table 1 below lists all current permits (including Part 71 permits), as amended, issued to the facility.

Table 1: List of Current Permits as Amended

Permit Number and/or Purpose of Issuance	Date of Issuance and Date of Amendments (if any)	Comments	
		Yes	No
4911-263-0013-P-03-0 (PSD Permit)	June 09, 2003	x	
4911-263-0013-E-01-0 (Acid Rain Permit)	November 30, 2001		x

Table 2: Comments on Specific Permits

Permit Number	Comments
4911-263-0013-P-03-0 (PSD Permit)	This permit was issued by EPD to transfer ownership of the Talbot Energy Facility to Oglethorpe Power Corporation from Talbot EMC.

D. Process Description

1. SIC Codes(s)

4911

The SIC Code identified above was 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)

The facility generates electricity for sale to local Electric Membership Cooperatives (EMC's) for sale and distribution to their membership. Electricity is generated by burning natural gas (in all turbines) and low sulfur diesel fuel (only in turbines T5 and T6) in simple cycle combustion turbines. The facility is a peaking power plant and delivers power to the local grid during periods of high demand.

3. Overall Facility Process Description

Talbot Energy Facility is a peaking power plant with six simple cycle combustion turbines, three fuel gas heaters and one low sulfur diesel fuel storage tank. Four of the six combustion turbines (CTs) and all three fuel gas heaters fire natural gas only. The fifth and sixth CT units (T5 and T6), have the ability to fire low sulfur diesel fuel or natural gas. Natural gas is the primary fuel for these two turbines. Dry Low-NO_x (DLN) combustors control NO_x emissions from the turbines and low NO_x burners control NO_x emissions from the fuel gas heaters during gas-fired operation, whereas water injection controls NO_x emissions during low sulfur diesel fuel firing of turbines T5 and T6. The plant also includes a lube oil demister vent for each CT.

4. Overall Process Flow Diagram (optional)

The reader is referred to Appendix A of Oglethorpe's Title V Permit Application for a depiction of the overall Process Flow Diagram.

E. Regulatory Status

1. PSD/NSR

The facility is major a source under PSD/NSR regulations. The facility is a major source of NO_x, PM, and PM₁₀ emission. The facility is not one of the 28 listed sources under the PSD regulations with a PSD major source threshold of 100 tons/year. The Permit has no limits whose purpose was to avoid a PSD/NSR review. Thus, there is no PSD/NSR avoidance condition in this Title V Permit. The facility is not located in a non-attainment area.

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	Y	Yes		
PM ₁₀	Y	Yes		
SO ₂	Y			Yes
VOC	Y	Yes		
NO _x	Y	Yes		
CO	Y	Yes		
TRS	n/a			n/a
H ₂ S	n/a			n/a
Individual HAP	Yes			Yes
Total HAPs	yes			Yes

3. MACT Standards

The site is not major for HAPs and is not subject to any MACT standards.

4. Program Applicability

Program Code	Applicable (y/n)
Program Code 6 - PSD	Y
Program Code 8 – Part 61 NESHAP	N
Program Code 9 - NSPS	Y
Program Code M – Part 63 NESHAP	N
Program Code V – Title V	Y

Regulatory Analysis

II. Facility Wide Requirements

A. Emission and Operating Caps:

None Applicable.

B. Applicable Rules and Regulations

Rules and Regulations Assessment – Not Applicable on a facility-wide basis.

Emission and Operating Standards – None Applicable on a facility-wide basis.

C. Compliance Status

Not Applicable.

D. Operational Flexibility

None requested.

E. Permit Conditions

None applicable.

III. Regulated Equipment Requirements

A. Brief Process Description

Talbot Energy Facility is a peaking power plant with six simple cycle combustion turbines, three fuel gas heaters and one low sulfur diesel fuel storage tank. Four of the six combustion turbines (CTs) and the three fuel gas heaters fire natural gas only. The fifth and sixth CT units (T5 and T6), have the ability to fire low sulfur diesel fuel or natural gas (primary fuel). Dry Low-NO_x (DLN) combustors control NO_x emissions from the turbines and low NO_x burners control NO_x emissions from the fuel gas heaters during gas-fired operation, whereas water injection controls NO_x emissions during low sulfur diesel fuel firing of turbines T5 and T6. The plant also includes a lube oil demister vent for each CT.

B. Equipment List for the Process

Emission Units		Specific Limitations/Requirements	Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	ID No.	Description
T1	Siemens-Westinghouse V84.2 Simple Cycle CT	40 CFR 52.21(j), 391-3-1-.02(b), 391-3-1-.02(g), 40 CFR 60 Subpart GG, Acid Rain Regulations	LC1	Dry low NO _x Combustor
T2	Siemens-Westinghouse V84.2 Simple Cycle CT	40 CFR 52.21(j), 391-3-1-.02(b), 391-3-1-.02(g), 40 CFR 60 Subpart GG, Acid Rain Regulations	LC2	Dry low NO _x Combustor
T3	Siemens-Westinghouse V84.2 Simple Cycle CT	40 CFR 52.21(j), 391-3-1-.02(b), 391-3-1-.02(g), 40 CFR 60 Subpart GG, Acid Rain Regulations	LC3	Dry low NO _x Combustor
T4	Siemens-Westinghouse V84.2 Simple Cycle CT	40 CFR 52.21(j), 391-3-1-.02(b), 391-3-1-.02(g), 40 CFR 60 Subpart GG, Acid Rain Regulations	LC4	Dry low NO _x Combustor
T5	Siemens-Westinghouse V84.2 Simple Cycle CT	40 CFR 52.21(j), 391-3-1-.02(b), 391-3-1-.02(g), 40 CFR 60 Subpart GG, Acid Rain Regulations	LC5 WI01	Dry low NO _x Combustor Water Injection (Low-sulfur diesel fuel)
T6	Siemens-Westinghouse V84.2 Simple Cycle CT	40 CFR 52.21(j), 391-3-1-.02(b), 391-3-1-.02(g), 40 CFR 60 Subpart GG, Acid Rain Regulations	LC6 WI02	Dry low NO _x Combustor Water Injection (Low-sulfur diesel fuel)
H1	Gas-fired fuel gas heater	40 CFR 52.21(j), 391-3-1-.02(d), 391-3-1-.02(g)	LC7	Low NO _x Burner
H2	Gas-fired fuel gas heater	40 CFR 52.21(j), 391-3-1-.02(d), 391-3-1-.02(g)	LC7	Low NO _x Burner

Emission Units		Specific Limitations/Requirements	Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	ID No.	Description
H3	Gas-fired fuel gas heater	40 CFR 52.21(j), 391-3-1-.02(d), 391-3-1-.02(g)	LC7	Low NOx Burner

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

C. Equipment & Rule Applicability

Emission and Operating Caps –

Combustion Turbines:

Operating Caps: Operation of turbines T1 to T4 is limited to 3750 hours each in any consecutive 12 month period. Operation of turbines T5 and T6 is limited to 4200 hours each per year, including no more than 450 hours of low sulfur diesel fuel operations. Only 100 hours of low sulfur diesel fuel operation is allowed for each turbine T5 and T6 during the summer ozone season (May 1 to September 30 each year). The hourly operational caps on the turbines were imposed as part of the PSD BACT Determination as per 40 CFR 52.21(j).

NO_x: The NO_x emission from each turbine is limited to 12 ppmvd while firing natural gas and 42 ppmvd while firing low sulfur diesel fuel (Turbines T5 and T6 only). These emission limits are BACT limits and are imposed as part of the PSD BACT Determination as per 40 CFR 52.21(j). The NO_x BACT limits are more stringent than limits under NSPS Subpart GG to which the turbines are subject. Thus, the NO_x BACT limits subsume the less stringent NSPS GG limits. The daily NO_x emissions, including startup and shutdown emission from each turbine, is limited to 1,365 pounds for natural gas firing and 5,751 pounds for low sulfur diesel fuel firing. This was part of the PSD BACT Determination.

CO: For natural gas firing, the CO emission from each turbine is limited to 0.019 pound per million BTU (equivalent to 8 ppmvd) as part of the PSD BACT Determination. For low sulfur diesel fuel firing (in Turbines T5 and T6), the CO BACT limit is 0.038 pound per million BTU (equivalent to 15 ppmvd). There is no CO limit under the NSPS GG regulation. The daily CO emissions including startup and shutdown emission from each turbine are limited to 438 pounds for natural gas firing and 833 pounds for low sulfur diesel fuel firing. This was part of the PSD BACT Determination.

VOC: For natural gas firing, the VOC emission from each turbine is limited to 0.0086 pound per million BTU (equivalent to 6 ppmvd) as part of the PSD BACT Determination. For low sulfur diesel fuel firing (in Turbines T5 and T6), the VOC BACT limit is 0.0149 pound per million BTU (equivalent to 10 ppmvd). There is no VOC limit under the NSPS GG regulation.

SO₂: The PSD permit specifies a natural gas sulfur excursion threshold of 0.032 grains per 100 scf, as determined by a semi-annual analysis of natural gas consumed in the combustion turbines.

The PSD Permit establishes a PSD BACT work practice standard for sulfur dioxide emissions resulting from natural gas combustion in the turbines, by specifying the use of natural gas as one of the allowable fuels for turbines T5 and T6 and the only allowable fuel for turbines T1, T2, T3, and T4. The PSD permit states that this BACT work practice standard subsumes the requirements of Georgia Rule (g) and NSPS Subpart GG requirements for the turbines. To limit sulfur-dioxide emissions from low sulfur diesel fuel combustion in turbines T5 and T6, operation of these turbines is limited to 450 hours each in any consecutive twelve months. The PSD permit limits the low sulfur diesel fuel sulfur content burned in the turbines T5 and T6 to less than or equal to 0.05 weight percent, as determined by the analysis of the low sulfur diesel fuel sulfur content each time fuel is transferred to the onsite storage tank from any source. The low sulfur diesel fuel sulfur content limit (PSD BACT limit) of 0.05 weight percent sulfur is much lower than the NSPS GG limit (0.8% sulfur by weight) and the Georgia Rule (g) (3% sulfur by weight) limit. Thus, the low sulfur diesel fuel PSD BACT limit subsumes the NSPS GG and Georgia Rule (g) limits.

PM/PM₁₀/Opacity: All turbines (T1 to T6) are limited to 0.023 pound per million BTU for PM emissions irrespective of the fuel fired, under the PSD permit. The opacity from the turbines is limited to 10% for both natural gas and low sulfur diesel fuel firing in the PSD permit. This limit is lower than the 40% limit allowed under State Rule (b). Thus, the PSD BACT opacity limit for the turbines subsumes the opacity limit under Georgia Rule (b).

Fuel Gas Heaters:

NO_x: The NO_x BACT limit for each fuel gas heater is 30 ppmvd, corrected to 15% oxygen under the PSD regulation.

CO: The CO BACT limit for each fuel gas heater is 0.022 pound per million BTU heat input, LHV basis under the PSD regulation.

VOC: The PSD Permit establishes a PSD BACT work practice standard for the fuel gas heaters by specifying pipeline natural gas as the only fuel allowed for the fuel gas heaters under the PSD regulation.

SO₂: The PSD Permit establishes a PSD BACT work practice standard for sulfur dioxide emissions resulting from natural gas firing in the fuel gas heaters by specifying the use of natural gas as the only allowable fuel. The PSD Permit states that this BACT work practice standard subsumes the requirements of Georgia Rule (g) for the heaters.

PM/PM₁₀/opacity: The PSD Permit establishes a PSD BACT work practice standard for PM/PM₁₀ and opacity from the fuel gas heaters by restricting the fuel used in the heaters to pipeline natural gas only. Firing of natural gas in the fuel gas heaters ensures compliance with Georgia Rule (d) for PM and Opacity.

Applicable Rules and Regulations –

Rules and Regulations Assessment:

PSD Source Classification: Emissions of NO_x, CO, VOC, SO₂, PM/PM₁₀ and opacity are subject to the requirements of 40 CFR 52.21 (PSD). This regulation is applicable because potential emissions of one or more of the applicable air pollutants (NO_x and PM₁₀) equal or exceed 250 tons per year. (Note: The Talbot Energy Facility is not one of the listed 28 source categories under the PSD.) The other applicable air pollutants (CO, VOC and SO₂) are subject to PSD, because their potential to emit equals or exceeds their respective PSD significant emission threshold.

Georgia Rule 391-3-1-.02(2)(g) applies to the combustion turbines and fuel gas heaters for fuel sulfur content since the turbines and heaters are fuel-burning sources under the State Rules. The requirements of 40 CFR 52.21 (PSD) subsume requirements of Rule (g) since the BACT sulfur limit for the low sulfur diesel fuel and the BACT work practice standard for pipeline natural gas are more stringent than the Rule (g) limit for these fuels for the turbines and the fuel gas heaters.

Georgia Rule 391-3-1-.02(2)(b) applies to the combustion turbines for visible emissions, since Rule (b) applies to visible emissions from any air contaminant source subject to another standard under Rule 391-3-1-.02(2). The PSD BACT limit for opacity for the combustion turbines subsumes the Georgia Rule (b) since the BACT opacity limit (10%) is more stringent than the Rule (b) limit (40%).

Georgia Rule 391-3-1-.02(2)(d) applies to the PM and visible emissions from the fuel gas heaters, since the fuel gas heaters are indirect-fired units. PM and opacity from the fuel gas heaters are subject to a PSD BACT work practice standard of using pipeline quality natural gas. This PSD BACT work practice standard of using natural gas in the fuel gas heaters assures compliance with the PM emission standard and opacity standard under Georgia Rule (d) for the fuel gas heaters.

NSPS GG (40 CFR 60, Subpart GG) applies to the combustion turbine emissions for NO_x and SO₂, since the combustion turbines are rated to be greater than 100 million BTU per hour, based on the lower heating value of the fuel fired and were constructed after October 3, 1977. For electric utility stationary gas turbines with a heat rating in excess of 100 million BTU per hour, the NSPS GG NO_x limit is 75 ppmvd. For stationary gas turbines with heat input at peak load between 100 and 10 million BTU per hour, the NSPS GG NO_x limit ranges from 75 to 150 ppmvd. For the combustion turbines at Talbot, the NSPS GG limit is 75 ppmvd. The requirements of 40 CFR 52.21 (PSD) assures compliance with the requirements of NSPS Subpart GG, since the PSD BACT limits for NO_x and SO₂ are more stringent than the NSPS GG limits. The fuel sulfur content limit under NSPS GG for the combustion turbines is 0.8 weight percent.

NSPS Kb (40 CFR 60, Subpart Kb) had applied to the low sulfur diesel fuel storage tank. However, EPA promulgated a revision to NSPS Kb in October 2003, which exempted all storage tanks subject only to the Record keeping requirements under the old NSPS Kb regulations. This removed the low sulfur diesel storage tank as an affected source since the vapor pressure of the low sulfur diesel fuel is less than 0.5 psi and it was subject only to the Record keeping requirements under the old NSPS Kb regulations.

Emission and Operating Standards:

The operational caps imposed under the PSD regulations are the same as specified above in Section C Equipment & Rule Applicability under Emission & Operating Caps.

D. Compliance Status

The facility operates in compliance with all applicable State & Federal Regulations and Standard.

E. Operational Flexibility

No alternate operating scenarios are presented or operational flexibility requested in the Title V Permit Application.

F. Permit Conditions

The Title V Permit has the same equipment specific emission and operational limits as the facilities existing PSD permit.

Condition 3.2.1 specifies the fuel restrictions for the combustion turbines.

Condition 3.2.2 specifies the sulfur content limit for the low sulfur diesel fuel fired in combustion turbines T5 and T6.

Condition 3.2.3 specifies the BACT for NO_x for all CTs firing natural gas.

Condition 3.2.4 lists annual operational restrictions for the combustion turbines.

Condition 3.2.5 lists the low sulfur diesel fuel firing restrictions for combustion turbines T5 and T6, including restrictions during the summer ozone season.

Condition 3.2.6 requires use of Water Injection as BACT for NO_x during low sulfur diesel fuel fired operation for combustion turbines T5 and T6.

Condition 3.2.7 specifies the BACT NO_x, CO, VOC, PM, and Opacity limits for the gas-fired operation of the combustion turbines.

Condition 3.2.8 specifies the BACT NO_x, CO, VOC, PM, and Opacity limits for low sulfur diesel fuel fired operation of combustion turbines T5 and T6.

Condition 3.2.9 sets the daily NOx and CO emission limits for combustion turbines, inclusive of all startup, and shut down emissions, for natural gas and low sulfur diesel fuel firing.

Condition 3.2.10 specifies that the fuel gas heaters shall be fired with natural gas only.

Condition 3.2.11 requires low NOx burners as BACT for NOx for the fuel gas heaters.

Condition 3.2.12 sets the NOx BACT limit for the fuel gas heaters.

Condition 3.2.13 sets the CO BACT limit for the fuel gas heaters.

IV. Testing Requirements (with Associated Record Keeping and Reporting)**A. General Testing Requirements**

The standard general requirements are included in this section of the permit. This permit does not have any exceptions to General Testing Requirements. In Condition 4.1.3 method 5T is specified as the reference test method for PM testing for the combustion turbines. The sampling time for each test run is also specified as one hour.

B. Specific Testing Requirements**1. Individual Equipment**

None in Title V Permit. All CT units and one fuel gas heater have been tested under testing requirements in the facilities current PSD permit. No further specific testing is required in the Title V Permit.

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

None Applicable.

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

A. General Monitoring Requirements

The standard general requirements are included in the permit. There are no modifications to these standard requirements.

B. Specific Monitoring Requirements

1. Individual Equipment:

Combustion Turbines:

The PSD Permit requires continuous monitoring of NO_x emissions from the combustion turbines using a Continuous Emission Monitoring System (CEMS). The PSD Permit requires recording of the one-hour average NO_x emission rates. The acid rain program also requires use of a NO_x CEMS for monitoring NO_x emissions. The PSD Permit requires continuous monitoring of CO emissions from the combustion turbines using a Continuous Emission Monitoring System (CEMS). The PSD Permit requires recording of the one-hour average CO emission rates. Therefore, Condition 5.2.1 requires NO_x and CO monitoring using a CEMS. The CEMS meet the periodic monitoring requirements since the emission data is monitored continuously. One-hour average NO_x and CO data is also recorded in pound per million BTU heat input (corrected to 15% oxygen on a dry basis).

The PSD Permit requires the Permittee to retain monthly records of the amount of low sulfur diesel fuel consumed in the combustion turbines. The PSD Permit also requires the Permittee to retain hourly records of the amount of natural gas burned in the combustion turbines. Periodic monitoring to provide for a reasonable assurance of compliance with the PSD operational limits consists of record keeping. Condition 5.2.2 satisfies the PSD and NSPS GG fuel consumption monitoring requirement.

The NSPS Subpart GG regulation (40 CFR 60.334) requires installation of a continuous monitoring system to monitor and record the fuel consumption and the ratio of water to fuel being fired in Turbines T5 and T6 as a method of parametric monitoring of NO_x emissions from the combustion turbines. However, since a NO_x CEM is being used, monitoring of the water to fuel ratio is not required since the water to fuel ratio provides only an indirect method of measuring NO_x, as per the EPA guidance "Approval of Routine Alternative Testing and Monitoring Procedures for Combustion Turbines Regulated Under New Source Performance Standards" dated May 26, 2000.

The permit requires no periodic monitoring of VOC emissions from the combustion turbines, since natural gas and low sulfur diesel fuels are clean fuel and the likelihood of violating the applicable PSD BACT VOC limit is minimal. No periodic monitoring of PM and opacity from the combustion turbines is required since natural gas and low sulfur diesel fuel are clean fuels and the likelihood of violating the applicable PSD BACT PM and opacity limits are minimal.

Fuel Gas Heaters:

The fuel gas heaters are fitted with low NO_x burners for NO_x control and NO_x emissions from these heaters are guaranteed to be 30 ppm or lower (corrected to 15% oxygen). The NO_x BACT limit for the fuel gas heater is set at 30 ppmvd corrected to 15% oxygen (NO_x rate of 0.697 lb/hour). Source tests of a fuel gas heater indicates that the actual NO_x emission rate is about one third the allowable NO_x BACT limit of 30 ppmvd (corrected to 15% oxygen). Hence, no periodic monitoring of NO_x from the fuel gas heaters is required.

The fuel gas heaters fire a clean fuel (pipeline quality natural gas) and the likelihood of violating the applicable PSD BACT CO limit is minimal. The actual CO emission rate is expected to be considerably lower than the short term PSD BACT CO limit, similar to what was observed from the testing of the heaters for NO_x. As a result, no periodic monitoring of CO emissions from the fuel gas heater is required in the proposed Title V Permit.

Compliance Assurance Monitoring (CAM):

Under the general applicability criteria for initial Title V permits submitted after April 20, 1998, 40 CFR 64 (the CAM regulation) only applies to emission units located at a major source, that use a control device to achieve compliance with an emission limit and whose post-control emissions exceed the major source threshold under the Title V operating permit program.

Combustion Turbines:

Combustion turbines T1, T2, T3, T4, T5, and T6 use low NO_x combustors for reducing NO_x emission while firing natural gas. Low NO_x combustors are passive control measures and are not control devices, since they do not remove NO_x after formation, for the purpose of determining CAM applicability. Thus, CAM is not applicable to turbines T1 to T4 for NO_x since they fire natural gas only. Also, for units T5 and T6, CAM is not applicable when they fire natural gas since no active control device is used to control NO_x emission during gas-fired operation.

Combustion turbines T5 and T6 utilize water injection to control NO_x emissions while firing low sulfur diesel fuel. Water injection is considered a control device for the purpose of determining CAM applicability. Post control NO_x emissions from turbines T5 or T6 do not exceed the major source threshold (100 tons/year) making CAM inapplicable to combustion turbines T5 and T6 for NO_x during initial Title V Permitting. Potential post control NO_x emission from turbines T5 or T6 is 45 tons per year for 450 hours of operation with low sulfur diesel fuel. Hence, CAM is not applicable to turbines T5 or T6 for NO_x during initial Title V Permitting.

Fuel gas heaters:

The fuel gas heaters use a passive control measure (low NO_x burners) for reducing NO_x emissions. Passive control measures are not control devices for the purpose of CAM applicability determination. Hence CAM is not applicable to the fuel gas heaters for any pollutant.

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

None.

VI. Other Record Keeping and Reporting Requirements

A. General Record Keeping and Reporting Requirements

The standard general requirements are included in the permit. No modifications to these standard requirements were made in this permit.

B. Specific Record Keeping and Reporting Requirements

1. Plant wide: None Applicable.

2. Individual Equipment

Combustion Turbines:

The frequency of monitoring of the sulfur and nitrogen content of the fuel fired in the turbine under NSPS GG is based on the fuel supply source. If the turbine is supplied from a bulk storage tank, as in the case of the low sulfur diesel fuel used in turbines T5 and T6, then the values are required to be determined on each occasion fuel is transferred to the storage tank from any other source. On the other hand, if the fuel is supplied without intermediate storage, as is the case with the pipeline natural gas supplied to the turbines, then the nitrogen and sulfur content must be determined and recorded daily.

Based on EPA's Aug. 14, 1987 guidance, no determination of the nitrogen content of the natural gas burned in the combustion turbine is required if the F factor used in calculation of NOx emissions is zero. The sulfur content of the natural gas is monitored by submittal of a semi-annual analysis of the gas by the supplier as approved by EPA's May 26, 2000 guidance.

Under EPA's May 26, 2000 guidance, no determination of the nitrogen content of low sulfur diesel fuel is required. This is because the F factor, which is impacted by the nitrogen content of the fuel, is zero in the calculation of NOx emissions from the combustion turbines. As per the NSPS GG regulation, the sulfur content of the low sulfur diesel fuel used in turbines T5 and T6 is monitored every time low sulfur diesel fuel is transferred to the storage tank, by submission of the fuel supplier certification for the sulfur content of the low sulfur diesel fuel.

In order to ensure compliance with the hourly operational caps imposed on the combustion turbines under the PSD regulation, the cumulative hours of operation of all turbines during all periods of operation are to be monitored and recorded on a monthly basis. The cumulative hours of operation of combustion turbines T5 and T6 when fired with low sulfur diesel fuel must be monitored using hour meters and this must be recorded monthly and for the last consecutive twelve month period each month for turbines T5 and T6. The cumulative hours of operation of combustion turbines T5 and T6, when fired with low sulfur diesel fuel from May 1 to September 30 each year, is to be monitored using hour meters and then recorded on a monthly basis.

This monitoring requirement of the PSD Permit meets periodic monitoring requirements under Part 70 since the operational hours data is monitored using operating hour meters.

The PSD permit sets BACT limits on NO_x and CO hourly emissions as well as daily NO_x and CO emissions for all turbines, and the sulfur content of the low sulfur diesel fuel fired in turbines T5 and T6. The PSD permit defines as an excursion when the sulfur content of natural gas, in any semi-annual analysis of natural gas burned in any combustion turbine, is in excess of 0.032 grains per 100 scf.

The PSD regulation requires Oglethorpe to calculate and record the mass emission rate (lb/hour) and the daily mass emission rate (lb/day) (including emissions from startup and shutdown) of NO_x and CO from each combustion turbine for every operational day.

3. Equipment Groups: None Applicable.

4. Permit Conditions:

Condition 6.2.1 requires Permittee to monitor the sulfur content of the natural gas burned in the combustion turbines by the submittal of a semiannual analysis of the gas by the supplier or by the Permittee as per EPA's May 26, 2000 guidance.

Condition 6.2.2 does not require determination of the nitrogen content of natural gas burned in the combustion turbines as per EPA's guidance of August 1987, since the F factor which is influenced by the nitrogen content of the fuel, is zero in the calculation of nitrogen oxide emissions from the turbines.

Condition 6.2.3 requires monitoring of the sulfur content of the low sulfur diesel fuel burned in the turbines T5 and T6 by supplier certification or by analysis conducted by the Permittee. No monitoring of the nitrogen content of low sulfur diesel fuel burned in the combustion turbines is required as per EPA's guidance of May 2000, since the F factor, which is influenced by the nitrogen content of the fuel, is zero in the calculation of nitrogen oxide emissions from the turbines.

Condition 6.2.4 requires Oglethorpe to retain monthly records of the natural gas and low sulfur diesel fuel consumption in each combustion turbine.

Condition 6.2.5 requires Oglethorpe to determine and record the monthly and the last twelve consecutive month total hours of operation for each combustion turbine. This condition also requires recording of the monthly and cumulative operational hours of turbines T5 and T6 when fired with low sulfur diesel fuel during the summer ozone months.

Conditions 6.2.6 to 6.2.9 require Oglethorpe to determine and record the mass emission rate (lb/hour) and the daily mass emission rate (lb/day) of NO_x and CO for each day of operations for each combustion turbine.

Condition 6.2.10 requires Oglethorpe to record the total NO_x and CO emissions from each turbine, each day, including emissions from startup and shutdown during the day.

Condition 6.2.11 requires Oglethorpe to submit the monthly and twelve consecutive month total hours of operation and emissions of NO_x and CO each day for each turbine in the quarterly operating report.

Condition 6.2.12 requires Oglethorpe to submit the cumulative monthly total low sulfur diesel fuel consumption and the hours of operation for T5 and T6, during the summer ozone months.

VII. Specific Requirements**A. Operational Flexibility**

No additional flexibility was requested in the Title V Permit application.

B. Alternative Requirements

There are no alternative requirements.

C. Insignificant Activities

Section §4.10 of the Title V permit application lists insignificant activities at the facility. These are listed as Attachment B in the Permit. There are no unusual issues concerning insignificant activities at the site.

D. Temporary Sources

No request was made for operation of temporary sources in this permit.

E. Short-Term Activities

No short term activities are listed in the Title V Permit Application.

F. Compliance Schedule/Progress Reports

The Permit application does not indicate any non-compliance issues at the facility. None has been identified by EPD in its Application review. Therefore, the permit does not have any Compliance Schedule or require any Progress Reports.

G. Emissions Trading

No emission trading is involved at this facility.

H. Acid Rain Requirements

The combustion turbines at Talbot are subject to Acid Rain Regulations. Title IV conditions are included in this Title V Permit.

I. Prevention of Accidental Releases

This facility is not currently subject to Prevention of Accidental Release provisions. However, permit conditions are specified in Condition 7.10 if these regulations become applicable in future.

J. Stratospheric Ozone Protection Requirements

The facility has indicated that they are not subject to Title VI regulations at the time of the application.

K. Pollution Prevention

None Applicable.

L. 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

EPD issued draft Permit No. 4911-263-0013-V-04-0 to Talbot Energy Facility on April 14, 2004. On April 26, 2004 the applicant requested a conference call with EPD regarding the draft permit. A conference call between both parties was held in early May 2004 and the applicant submitted adverse comments as part of the conference call. EPD revised the draft permit, in part, based on the adverse comments and issued a revised draft permit on May 20, 2004. The applicant requested a second conference call on May 26, 2004 in order to submit adverse comments on the revised draft permit. EPD declined to participate in this call and reminded the applicant that purpose of the 20-day review period is not to resolve all problems. With that in mind, the applicant agreed to publish the Title V Public Notice. The Title V Public notice was published in the Talbotton New Era on June 4, 2004. The 30-day public comment period expired on July 6, 2004. Written comments were received from the applicant on July 6, 2004 and September 20, 2004.

Comment: Permittee requested the following additions (underlined section) to Conditions 3.3.7 and 3.3.8

- 3.3.7 The Permittee shall not discharge or cause the discharge into the atmosphere from any combustion turbine, excluding periods of startup and shutdown, when firing natural gas, any gases which:
[40 CFR 52.21(j) and 391-3-1-.02(2)(a)7]
- 3.3.8 The Permittee shall not discharge or cause the discharge into the atmosphere from the combustion turbines T5 and T6, excluding periods of startup and shutdown, when firing low sulfur diesel fuel, any gases which:
[40 CFR 52.21(j) and 391-3-1-.02(2)(a)7]

Response: Draft Title V Permit Condition Nos. 3.3.7 and 3.3.8 specify the short term PSD BACT limits for emissions of NO_x, CO, PM, VOC and opacity. These draft permit conditions were taken directly from Talbot's PSD Permit Condition numbers 2.11 and 2.12.

PSD Permit Condition numbers 2.11 and 2.12 and Draft Permit Condition Nos. 3.3.7 and 3.3.8 apply during normal source operation which includes periods of startup and shutdown. The applicant requested that the Title V permit include new language, which would exclude the PSD BACT emission limits from applying during periods of startup and shutdown.

EPD informed the applicant on March 3, 2004 that such a change must go through PSD review. The initial Title V permit development did not include a PSD BACT review, PSD air impact assessment and EPA NSR review, and as such the requested permit revision cannot be incorporated as part of the initial Title V permit. EPD informed the applicant of this fact in a letter dated March 3, 2004. These specific changes are being considered as part of Application No. 15233 and this application number pertains to revisions of the original BACT analysis for this site.

Draft Permit Condition Nos. 3.3.7 and 3.3.8 are not revised based on this comment.

Comments: Oglethorpe requested replacement of the daily emission limits for NO_x and CO in Condition 3.3.9 with 12-month rolling average limits.

- 3.3.9 The Permittee shall not discharge, or cause the discharge, into the atmosphere, from each combustion turbine, any gases which:
- a. For Units T1 – T4
 - i. Contain NO_x emissions, including startup and shutdown, in excess of ~~4,365 pounds per day~~ 106.6 tons, on a 12 month rolling average basis;
 - ii. Contain CO emissions, including startup and shutdown, in excess of ~~438 pounds per day~~ 34.2 tons, on a 12 month rolling average basis;
 - b. For Units T5 – T6
 - i. Contain NO_x emissions, including startup and shutdown, in excess of 5751 pounds per day 160.6 tons, on a 12 month rolling average basis;
 - ii. Contain CO emissions, including startup and shutdown, in excess of 833 pounds per day 42.0 tons, on a 12 month rolling average basis.

Note: The underlined portion is the proposed limits, the strikethrough portion is the existing limits.

Response: Draft Title V Permit Condition 3.3.9 specifies the daily PSD BACT limits for emissions of NO_x and CO. The applicant requests that these daily emission limits be replaced with rolling twelve month emission limits. EPD informed the applicant on March 3, 2004 that such a change must go through PSD review. The initial Title V permit development did not include a PSD BACT review, PSD air impact assessment and EPA NSR review and as such the requested permit revision cannot be incorporated as part of the initial Title V permit. EPD informed the applicant of this fact in a letter dated March 3, 2004. These specific changes are being considered as part of Application No. 15233 and this application number pertains to revisions of the original BACT analysis for this site. Draft permit Condition 3.3.9 is not revised based on this comment.

Comment: Oglethorpe proposed a new condition 3.3.14 defining startup and shutdown periods for the combustion turbines covering various operating conditions.

- 3.3.14 In the context of administering this permit, including but not limited to the application of Conditions 3.3.7, 3.3.8, 6.1.7, 8.14.4 and 8.17.1,
- a. The time allocated to startup of each turbine T1 – T6 is the lesser of:
 - i. 30 minutes, or
 - ii. When beginning combustion with natural gas, the time from a flame on signal until two minutes after the premix signal, or

- iii. When beginning combustion with fuel oil, the time from a flame on signal (for the propane or natural gas startup fuel) until water injection reaches 110 gallons per minute, or
 - iv. When beginning combustion with fuel oil after transitioning from natural gas combustion, the time from the point when natural gas flow is cut off until water injection reaches 110 gallons per minute, or
 - v. When beginning combustion with natural gas after transitioning from fuel oil combustion, the time from the point when fuel oil flow is cut off until two minutes after the premix signal.
- b. Time allocated to a shutdown of each turbine T1 – T6 is the lesser of:
- i. 30 minutes, or
 - ii. When shutting down completely when combusting either natural gas or fuel oil, the time from when the control system shutdown command is given until the flame out signal is received, or
 - iii. When shutting down fuel oil combustion and transitioning to natural gas combustion, the time from when water injection drops below 110 gallons per minute to the point at which fuel oil flow is cut off, or
 - iv. When shutting down natural gas combustion and transitioning to fuel oil combustion, the time from termination of the premix signal until the point at which the natural gas flow has been cut off.

Response: The applicant requests the incorporation of a new condition number 3.3.14, to the initial Title V permit. The applicant states that the purpose of the proposed new condition number 3.3.14 is to define startup and shutdown of the combustion turbines as part of a BACT work practice standard. The incorporation of such a condition is being considered as part of Application No. 15233 and this application number pertains to revisions of the original BACT analysis for this site. Proposed new condition 3.3.14 is not added based on this comment.

Comment: Oglethorpe requested clarification to Condition 4.1.3 m, to reflect the fact that the test methods apply only to liquid fuels.

Response: EPD has reviewed the requested change and made the requested change to Condition 4.1.3 m.

Comment: Condition 5.1.1: Oglethorpe comments that the language “Monitoring system response, relating only to calibration checks and zero and span adjustments, shall be measured and recorded during such periods.” in Condition 5.1.1 is a requirement not found in the SIP Permit. The intent of this sentence is unclear. As written, it could be interpreted as meaning that only the responses of the system related to the calibration checks are to be “recorded during such periods.” If so, then other system responses, i.e., system status, operating parameters, etc. would not be recorded. In addition, the meaning of the phrase “during such periods” is unclear. For example, does the word “periods” refer to periods of “monitoring system breakdowns and repairs” or periods of “calibration checks and zero and span adjustments?” To clarify what OPC believes EPD intends this condition to mean, the following revisions to Condition 5.5.1 are suggested:

- 5.1.1 Any continuous monitoring system is ... Monitoring system response, relating ~~only~~ to calibration checks and zero and span adjustments, shall be measured and recorded during ~~such~~ periods of the continuous monitoring system breakdown and repair.

Response: EPD has reviewed Oglethorpe's request and agrees that the term "such periods" in the first sentence of Condition 5.1.1 is confusing. EPD revised the condition as requested.

Comment: Oglethorpe requested addition of language to Condition 5.2.1, to clarify when an hour of operating data constitutes a valid hour:

- 5.2.1 The Permittee shall install, calibrate ...Division's monitoring requirements. For the purposes of applying any monitoring requirement to this permit, 30 minutes of emissions data, acquired during any clock hour, are required to constitute a valid hour.

Response: EPD has reviewed Permittee's request for addition to Condition 5.2.1. EPD agrees that under the current rules only 30 minutes of emission data are required during an hour for the hour to be a valid hour. Therefore, EPD believes that there is no need to add the suggested language to Condition 5.2.1. No changes are made to this condition.

Comment: Oglethorpe commented that Condition 5.2.2 b requiring monitoring of the volume of low sulfur diesel fuel burned each month in combustion turbines T5 and T6 does not relate to any applicable requirement for these emission units. Therefore condition 5.2.2 b should be removed from the draft permit. In addition, Oglethorpe power requested by e-mail on September 20, 2004 that in case Condition 5.2.2 b is retained in the permit, Condition 5.5.2 b be revised to require recording of data "hourly" instead of "monthly" for combustion turbines T5 and T6.

Response: Monitoring of fuel oil consumption in turbines T5 and T6 is required to estimate emissions of NO_x, CO and other pollutants from turbines T5 and T6 while firing fuel oil. NO_x and CO emissions from turbines T5 and T6 are required to ensure compliance with the daily NO_x and CO emission limits in Condition 3.3.9. Condition 5.2.2 b is revised to require "hourly" recording of data.

Comment: Oglethorpe requested addition of language to Condition 5.2.4, to maintain consistency with other recent Title V Permits issued by EPD.

- 5.2.4 The Permittee shall obtain ... prescribed in Condition 4.1.3. The following exceptions to Appendix F, Procedure 1 are allowed:
- a. The cylinder gas audit (CGA) is only required to be conducted in a calendar quarter if the turbine is operated during the quarter.
 - b. A Relative Accuracy Test Audit (RATA) shall be conducted annually or every four operating quarters (not to exceed eight calendar quarters), whichever is greater. For the purpose of this condition, an operating quarter is defined as any calendar quarter during which the turbine is operated.

Response: EPD agrees and has revised the condition accordingly.

Comments: Oglethorpe requested addition of language to Condition 5.2.7 to clarify how data is reported when both natural gas and low sulfur diesel fuel is combusted in the same hour for turbines T5 or T6.

5.2.7 The Permittee shall calculate and record ... with Condition 5.2.6. For purposes of this condition, three-hour averages shall be calculated for the combustion of only one fuel type, either natural gas or very low sulfur diesel fuel. For any hour where any very low sulfur diesel fuel is combusted, such hour will be considered in the three-hour rolling average NOx emission rate calculation for diesel fuel only.

Response: EPD agrees and has revised the condition accordingly.

Comment: Oglethorpe requested addition of language to Condition 5.2.9 to clarify how data is reported when both natural gas and low sulfur diesel fuel is combusted in the same hour for turbines T5 or T6.

5.2.9 The Permittee shall calculate and record ... very low sulfur diesel fuel. For any hour where any very low sulfur diesel fuel is combusted, such hour will be considered in the three-hour rolling average CO emission rate calculation for diesel fuel only.

Response: EPD agrees and has revised the condition accordingly.

Comment: Oglethorpe requested revision to Condition 6.1.7 to reflect proper reporting of exceedances, as follows:

- b. Exceedances...
 - i. Any three-hour rolling average NOx emission rate, determined in accordance with Condition 5.2.7, excluding periods of startup and shutdown, which exceeds 12 ppmvd
...
 - ii. Any three-hour rolling average NOx emission rate, determined in accordance with Condition 5.2.7, excluding periods of startup and shutdown, which exceeds 42 ppmvd
...
 - iii. Any three-hour rolling average CO emission rate, determined in accordance with Condition 5.2.9, excluding periods of startup and shutdown, which exceeds 8 ppmvd
...
 - iv. Any three-hour rolling average CO emission rate, determined in accordance with Condition 5.2.9, excluding periods of startup and shutdown, which exceeds 15 ppmvd
...

Response: As stated in our response to comments made on draft Title V Permit Condition Nos. 3.3.7, 3.3.8 and 3.3.9, such a change must go through PSD review. Draft Condition 6.1.7.b is not changed based on this requirement.

In addition, Oglethorpe proposed further changes to Conditions 6.1.7 b. to reflect the change in NOx and CO emission limits from daily to annual limits.

- b. Exceedances...
 - ix. Any 12 month rolling average day in which the daily total NOx emissions, on a per turbine basis including startup, ~~and shutdown and malfunction~~, exceeds 106.6 tons ~~1,365 pounds~~ for combustion turbines T1 through T4. ~~This limit ... during that day.~~

- x. Any 12-month rolling average day in which the ~~daily~~ total NOx emissions, on a per turbine basis including startup, ~~and shutdown and malfunction~~, exceeds 160.6 tons ~~5,751 pounds~~ for combustion turbines T5 or T6, ~~when low sulfur diesel fuel is fired in the combustion turbine that day.~~
- xi. Any 12-month rolling average day in which the ~~daily~~ total CO emissions, on a per turbine basis including startup, ~~and shutdown and malfunction~~, exceeds 34.2 tons ~~438 pounds~~ for combustion turbines T1 through T4. ~~This limit ... that day.~~
- xii. Any 12 month rolling average day in which the ~~daily~~ total CO emissions, on a per turbine basis including startup, ~~and shutdown and malfunction~~, exceeds 42.0 tons ~~5,751 pounds~~ for combustion turbines T5 or T6, ~~when low sulfur diesel is fired in the combustion turbines that day.~~

Response: As stated in our response to comments made on draft Title V Permit Condition Nos. 3.3.7, 3.3.8 and 3.3.9, such a change must go through PSD review. Draft Condition 6.1.7.b is not changed based on this requirement.

Comment: Proposed changes to Condition 8.8. Oglethorpe proposed addition of the language 'Unless otherwise directed by EPD,' to the start of Conditions 8.8.1 and 8.8.2.

8.8.1 Unless otherwise directed by EPD, Reports, test data, monitoring data, notifications, annual certifications, and requests for revision and renewal shall be submitted to: ...

In a similar fashion, OPC requests that Condition 8.8.2 be revised as follows:

8.8.2 Unless otherwise directed by EPD, Any records, compliance certifications, and monitoring data required by the provisions in this Permit to be submitted to the EPA shall be sent to: ...

Response: Conditions 8.8.1 and 8.8.2 are template conditions and do not require addition of the proposed language since all state submissions for Title V sources that are not assigned to the Districts are made to the EPD's Air Protection Branch in Atlanta and not to the district office where the facility is located. For sources assigned to District offices, Condition 8.8.1 indicates which documents go to the district office and which go the EPD's Atlanta office. Similarly all EPA reports are to be mailed to EPA's region IV office in Atlanta as specified in Condition 8.8.2. Hence, no change is made to these conditions.

MODIFIED CONDITIONS IN PERMIT NO. 4911-263-0013-V-04-0

Each Draft Permit Condition that has been modified in Permit No. 4911-263-0013-V-04-0 is listed below. Strikethroughs represent language that has been deleted/removed from the draft permit and underlines represent language that has been added to the draft permit condition.

- 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:
- m. ASTM Test Methods D129, D1552, D2622 or D4294 shall be used for the determination of fuel sulfur content of the low sulfur diesel fuel.
- 5.1.1 Any continuous monitoring system required by the Division and installed by the Permittee shall be in continuous operation and data recorded during all periods of operation of the affected facility except for continuous monitoring system breakdowns and repairs. Monitoring system response, relating ~~only~~ to calibration checks and zero and span adjustments, shall be measured and recorded during ~~such~~ periods of the continuous monitoring system breakdowns and repairs. Maintenance or repair shall be conducted in the most expedient manner to minimize the period during which the system is out of service.
[391-3-1-.02(6)(b)1]
- 5.2.2 The Permittee shall install, calibrate, maintain, and operate monitoring devices for the measurement of the indicated parameter on the following equipment. Data shall be recorded at the frequency 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 52.21 and 40 CFR 70.6(a)(3)(i)]
- a. The volume of natural gas, in cubic feet, burned in each combustion turbine. Data shall be recorded hourly for each combustion turbine in operation firing natural gas.
- b. The volume of low sulfur diesel fuel (in gallons) burned in combustion turbines T5 and T6 (on a per turbine basis). Data shall be recorded ~~monthly~~ hourly for combustion turbines T5 and T6.
- 5.2.4 The Permittee shall, using the procedures of Appendix F, Procedure 1 (*Quality Assurance Requirements for Gas Continuous Emissions Monitoring Systems Used for Compliance Determination*) contained in the Division's **Procedures for Testing and Monitoring Sources of Air Pollutants**, assess the quality and accuracy of the data acquired by the carbon monoxide CEMS required by Condition 5.2.1b. The following exceptions to Appendix F, Procedure 1 are allowed:
- a. The cylinder gas audit (CGA) is only required to be conducted in a calendar quarter if the turbine is operated during the quarter.

b. A Relative Accuracy Test Audit (RATA) shall be conducted annually or every four operating quarters (not to exceed eight calendar quarters), whichever is greater. For the purpose of this condition, an operating quarter is defined as any calendar quarter during which the turbine is operated.

[391-3-1-.02(6)(b)1]

5.2.7 The Permittee shall calculate and record a three-hour average rolling NO_x emission rate (in ppmvd at 15 percent oxygen) for each combustion turbine (T1, T2, T3, T4, T5, and T6) using the NO_x emission rate determined in accordance with Condition 5.2.6. For purposes of this condition, three-hour averages shall be calculated for the combustion of only one fuel type, either natural gas or low sulfur diesel fuel. For any hour where any low sulfur diesel fuel is combusted, such hour will be considered in the three-hour rolling average NO_x emission rate calculation for diesel fuel only.

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

5.2.9 The Permittee shall calculate and record three-hour average rolling CO emission rates (in ppmvd at 15 percent oxygen) for each combustion turbine (T1, T2, T3, T4, T5, and T6) using the applicable CO emission rates determined in accordance with Condition 5.2.8. For purposes of this condition, three-hour averages shall be calculated for the combustion of only one fuel type, either natural gas or low sulfur diesel fuel. For any hour where any low sulfur diesel fuel is combusted, such hour will be considered in the three-hour rolling average NO_x emission rate calculation for low sulfur diesel fuel only.

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