

Facility Name: **Monroe Power Plant**
 City: Monroe
 County: Walton
 AIRS #: 04-13-297-00040

Application #: TV- 12332
 Date Application Received: June 12, 2000
 Date Application Deemed
 Administratively Complete: August 11, 2000
 Date of Draft Permit: May 31, 2001
 Permit No: 4911-297-0040-V-05-0

Program	Review Engineers	Review Managers
SSPP/ASU	Susan Jenkins	James Capp
SSCP/ASU	Tennille Frock	James Eason
ISMP	Bradley Belflower	Larry Webber
TOXICS	Not Applicable	Not Applicable

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 in simpler terms and/or greater detail than is sometimes possible in the actual permit. This permit is being proposed pursuant to: (1) Section 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 primary purpose of this permit is to consolidate and identify existing state and federal air requirements applicable to the **Monroe Power Plant** 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, then the applicable requirements and their significance, and finally the methods for determining compliance with those applicable requirements. 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 participation process will be described in an addendum to this narrative.

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

1. Facility Name: Monroe Power Plant
2. Parent/Holding Company Name: Monroe Power Company
3. Previous and/or Other Name(s): Previous names identified are noted as follows:
Carolina Power & Light - Walton County Peaking Project
4. Facility Location

Indicate the street address: 208 Cherry Hill Road, Monroe, Walton County, Georgia 30655

5. Attainment or Non-attainment Area Location

Walton County is an attainment area for all pollutants but has been determined, by the Division, to be an area contributing to the ambient air level of ozone in the metropolitan Atlanta ozone nonattainment area.

6. Class I Area Impacts

The facility is not located within 100 km of a Class I area. Note: EPA's official web site listing Class I areas can be accessed as <http://www.epa.gov/air/vis/class1.html>.

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 permits (including Part 71 permits), as amended, issued to the facility. Based on a comparative review of Item 19 in Section 1.10 of the Title V application and the "Permit" file(s) on the facility found in the Air Branch office, comments are listed in Table 2 below.

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
4911-297-0040-E-02-0	June 15, 1999	X	
4911-297-0040-E-04-0	September 30, 1999	X	
4911-297-0040-E-04-1	June 30, 2000	X	

Table 2: Comments on Specific Permits

Permit Number	Comments
4911-297-0040-E-02-0	Phase II Acid Rain Permit.
4911-297-0040-E-04-0	Construction and operating permit.
4911-297-0040-E-04-1	Revised Condition No. 5.3.

This summary will also discuss the various permits issued to said facility as they were all issued within a short period of time of each other.

SIP Application No. Date of Application	Description	Permit No./Date Issued	Permit Revoked?
11108 12/18/98 and 1/8/99	Construction and Operation of two CTs and two fuel oil storage tanks	4911-297-0040-E-01-0 2/15/99	Yes, by 4911-297-0040-E-03-0 on 6/2/99
11109 12/18/98 and 1/8/99	Phase II Acid Rain	4911-297-0040-E-02-0 6/15/99	No
11400 4/13/99	Facility Name Change	4911-297-0040-E-03-0 6/2/99	Yes, by 4911-297-0040-E-04-0 on 9/30/99
11616 6/8/99	Specific Permit Revision	4911-297-0040-E-04-0 9/30/99	No
12342 5/16/99	Specific Permit Revision	4911-297-0040-E-04-1 6/30/00	No

D. Process Description

1. SIC Code(s)

Major - 4911
Other - None

2. Description of Product(s)

The facility produces electricity for sale.

3. Overall Facility Process Description

The facility consists of two simple cycle combustion turbines (CT01 and CT02). The units fire natural gas as a primary fuel and low sulfur distillate fuel oil as backup. These turbines are equipped with water injection for NOx control. Each unit generates a base load rating of approximately 184 MW. Each turbine vents through its own 50 foot stack.

4. Overall Process Flow Diagram (optional)

A process flow diagram is not applicable for this facility. They have included an overall site plan in their Title V permit application.

E. Regulatory Status

1. PSD/NSR

The major source threshold for NOx for a facility in Walton County has been set at 100 tons per year since the facility was first permitted. A summary of the regulatory status under PSD/NSR is provided for clarification.

December 18, 1998 to October 6, 1999

Facility received authorization to construct and operate facility. The facility is a minor source under PSD because it has potential emissions of NO_x, CO, PM/PM₁₀, SO₂, and VOC limited below 250 tpy. [Note: The facility is not one of the 28 named source categories under PSD.] Their PSD avoidance status is accomplished by the following:

- Condition 2.2 limits NO_x emissions below 250 tons during any twelve consecutive months.
- Condition Nos. 2.3, 2.5, and 2.6 limit CO emissions below 250 tons during any twelve consecutive months.
- Condition 2.4 limits fuel oil usage which limits SO₂ (and PM/PM₁₀ and VOC) emissions below 250 tons during any twelve consecutive months.

October 7, 1999 to February 15, 2000

The Georgia DNR Board adopted revisions to Georgia Air Quality Control Rule 391-3-1 and these revisions became effective October 7, 1999. Georgia Rule 391-3-1-.03(8)(c)14 set the NO_x (and VOC) “major source” threshold in Walton County, among others, at 100 tpy. Monroe Power is considered a “grandfathered” source for this rule and not subject to the requirements of Georgia Rule 391-3-1-.03(8)(c). This is the case because Monroe Power submitted a complete SIP permit application on or before June 6, 1999. The facility is still a minor source under PSD for CO, VOC, SO₂, and PM/PM₁₀ where the threshold is 250 tpy.

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

3. MACT Standards

The facility is not subject to a proposed or final MACT standard.

4. Program Applicability

Program Code	Applicable (Yes/No)
Program Code 6 - PSD	No
Program Code 8 - Part 61 NESHAP	No

Program Code	Applicable (Yes/No)
Program Code 9 - NSPS	Yes
Program Code M - Part 63 NESHAP	No
Program Code V - Title V	Yes

Regulatory Analysis

II. Facility Wide Requirements

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

III. Regulated Equipment Requirements

A. Brief Process Description

The facility consists of two simple cycle combustion turbines (CT01 and CT02). The units fire natural gas as a primary fuel and low sulfur distillate fuel oil as backup. These turbines are equipped with water injection for NOx control. Each unit generates a base load rating of approximately 184 MW. Each turbine vents through its own 50 foot stack.

B. Equipment List for the Process

Emission Unit ID No.	Emission Unit Description	Pollutant(s) Emitted	Applicable Requirements	Is the Rule or Regulation Federally Enforceable?	APCE* Control ID No.	APCE Description
CT01	Combustion turbine	NOx, SO ₂ , CO, VOC, PM, PM10, HAPs	391-3-1-.02(2)(g) 391-3-1-.02(2)(b) 391-3-1-.02(2)(nnn) 40 CFR 60 Subpart GG; Acid Rain	Yes Yes Yes Yes Yes	WAT1	Water Injection
CT02	Combustion turbine	NOx, SO ₂ , CO, VOC, PM, PM10, HAPs	391-3-1-.02(2)(g) 391-3-1-.02(2)(b) 391-3-1-.02(2)(nnn) 40 CFR 60 Subpart GG; Acid Rain	Yes Yes Yes Yes Yes	WAT2	Water Injection
TK01	Fuel oil storage tank	VOC, HAPs, PM	40 CFR 60 Subpart Kb	Yes	None	NA

Emission Unit ID No.	Emission Unit Description	Pollutant(s) Emitted	Applicable Requirements	Is the Rule or Regulation Federally Enforceable?	APCE* Control ID No.	APCE Description
TK02	Fuel oil storage tank	VOC, PM	40 CFR 60 Subpart Kb	Yes	None	NA

C. Equipment & Rule Applicability

Combustion Turbines CT01 and CT02

The Monroe Power Plant [Monroe Power] includes two Westinghouse 501F combustion turbines, CT01 and CT02, each with a power output rating of approximately 184 MW. These units are fired primarily with pipeline quality natural gas and distillate fuel oil as backup. Each turbine utilizes water injection to control NOx emissions.

The actual date of initial startup of CT01 was July 1, 1999. The actual date of initial startup of CT02 was January 11, 2001. The turbines do not require a preheater by design; however, they are equipped with lube oil demister vents.

NOx Emissions

Each combustion turbine is subject to the requirements of 40 CFR 60, Subpart GG - "Standard of Performance for Stationary Gas Turbines" because each has a heat input at peak load equal to or greater than 10.7 gigajoules per hour [10.14 MMBtu/hr], based on the lower heating value of the fuel fired; and because the turbines were constructed after October 3, 1977. The NSPS General Provisions [40 CFR 60, Subpart A] also apply to each turbine.

The maximum allowable NOx emission rate from each turbine, as specified by NSPS Subpart GG [40 CFR 60.332(b)], is approximately 103 ppmvd, at 15% oxygen [Heat rate = 11.46 kJ/Wh]. The Westinghouse manufacturing specifications for the 501F turbine states that the expected NOx emission rate at base load and 59°F is approximately 25 ppmvd, at 15% oxygen (natural gas) and 42 ppmvd, at 15% oxygen (distillate fuel oil).

Monroe Power conducted NOx performance testing on turbine CT01 on October 27, 1999 and the following table illustrates the results: [Note: NOx performance testing on CT02 has not yet been conducted.]

Unit	Tested NOx Emission Rate (ppmvd at 15% oxygen)	NOx Emissions (lb/MMBtu)	NOx Emissions (lb/hr)
CT01 - Natural Gas	@ 100% load (~170 MW) = 42.6	0.1558	277.8
	@ 75% load (~140 MW) = 49.9	0.1825	325.4
	@ 50% load (~110 MW) = 73.6	0.2692	479.98
	@ 30 % load (~70 MW) = 85	0.3109	554.3
CT01 - Fuel Oil	@ 100% load (~155 MW) = 70.5	0.2721	496
	@ 75% load (~125 MW) = 59.7	0.2304	420
	@ 50% load (~98 MW) = 64.1	0.247	450
	@ 30 % load (~75 MW) = 64.6	0.249	454

Note: Conversion from ppmvd at 15% oxygen to lb/MMBtu was achieved using 40 CFR 60 Method 19

Note: Conversion from lb/MMBtu to lb/hr was achieved assuming a heat input rate of 1783 MMBtu/hr (natural gas) and 1825 MMBtu/hr (fuel oil). Heat input values were taken from Title V permit application and represent maximum. This tends to overestimate NOx emissions at lower than base loads.

Each combustion turbine will be subject to Georgia Rule 391-3-1-.02(2)(nnn)1.(i) during the period May 1 through September 30 of each year beginning May 1, 2003. These combustion turbines were permitted under Georgia Rule 391-

3-1-.03(1) before April 1, 2000 and as such will have to comply with the NOx emission standard by May 1, 2003. Georgia Rule (nnn) limits NOx emission to 30 ppm at 15 percent oxygen, dry basis, during periods of natural gas and distillate fuel oil combustion. Monroe Power should be able to comply with the requirements of Georgia Rule (nnn) by injecting more water. Georgia Rule 391-3-1-.02(2)(nnn)1(ii) specifies a NOx emission limit for a combustion turbine at a facility with no natural gas. It is important to note that the phrase with no natural gas does not refer to periods of time that natural gas is curtailed to the site. Monroe Power has asked EPD about the averaging time for the NOx emission limit in Georgia Rule (nnn). The averaging time of the NOx limit in Georgia Rule (nnn) is tied to or based on the run time(s) specified by the applicable reference test method(s) (i.e., Method 7E) required for demonstrating compliance. The run time(s) specified for Method 7E is three 1-hour tests (i.e., 3-hour average).

In addition to the short term NOx emission limit, NOx emissions from the turbines, combined, are limited to not equal or exceed 250 tons during any twelve consecutive months. *Note: EPD will clarify, in the Title V permit, that this emission rate includes emissions occurring during startup and shutdown* Actual NOx emissions were 10.53 tpy in 1999 and 83.54 tpy in 2000.

CO Emissions

The potential CO emissions from the turbines, combined, are limited to not equal or exceed 250 tons during any twelve consecutive months by limiting their hours of operation and maximum hourly mass emission rate. Westinghouse predicted a short term CO emission rate of approximately 200 lbs/hr while firing on natural gas and 100 lbs/hr while firing on distillate fuel oil. The CO emission rate while burning natural gas, based on AP-42, was determined to be approximately 154 lbs/hr. The CO emission rate while burning distillate fuel oil, based on AP-42, was determined to be approximately 100 lbs/hr. With this in mind, EPD restricted CO emissions by limiting the hourly CO mass emission rate to 200 lb/hr [irregardless of fuel type] and operation of the turbines to no more than 2500 hours during any twelve consecutive months.

Monroe Power conducted CO performance testing on turbine CT01 on October 26, 1999 and September 13-14, 2000 and the following table illustrates the results:

Unit	Tested CO Emission Rate
CT01 - Natural Gas	@ 100% load (~168 MW) - 43.29 lb/hr @ 50% load (~110 MW) -36.2 lb/hr
CT01 - Fuel Oil	@ 100% load (~141 MW) - 2.23 lb/hr @ 50% load (~98 MW) - 63.5 lb/hr

EPD assessed whether potential CO emissions are below 250 tpy without the existing operational limits. Based on the test results for CT01, potential CO emissions are computed as follows:

Natural Gas/ Base Load

$$\text{CO (TPY)} = (2 \text{ CTs}) * (43.29 \text{ lbs /hr}) * (8760 \text{ hrs/yr}) * (1 \text{ ton}/2000 \text{ lb}) = 379.22 \text{ tpy}$$

Fuel Oil/Base Load

$$\text{CO (TPY)} = (2 \text{ CTs}) * (2.23 \text{ lbs /hr}) * (8760 \text{ hrs/yr}) * (1 \text{ ton}/2000 \text{ lb}) = 19.54 \text{ tpy}$$

Natural Gas/ 50% Load

$$\text{CO (TPY)} = (2 \text{ CTs}) * (36.2 \text{ lbs /hr}) * (8760 \text{ hrs/yr}) * (1 \text{ ton}/2000 \text{ lb}) = 317 \text{ tpy}$$

Fuel Oil/50% Load

$$\text{CO (TPY)} = (2 \text{ CTs}) * (63.5 \text{ lbs /hr}) * (8760 \text{ hrs/yr}) * (1 \text{ ton}/2000 \text{ lb}) = 556.3 \text{ tpy}$$

This analysis shows that an operational limit is still needed to maintain potential CO emissions below 250 tpy over the fuel type and load ranged requested by Monroe Power. EPD proposes to retain the existing CO emission limiting

restrictions in their Title V permit: (1) short-term CO emission limit of 200 lbs/hr; and (2) an hours of operation limit for the turbines combined to 2500 hours/yr. Actual hours of operation were 79.21 in 1999 and 915 in 2000.

SO₂ Emissions

The maximum allowable fuel sulfur content is established by Georgia Rule 391-3-1-.02(2)(g) [i.e., 2.5 weight percent], 40 CFR 60.333(b)[i.e., 0.8 weight percent] and Georgia Rule 391-3-1-.03(2)(c) for PSD Avoidance purposes. The Division assumes negligible fuel sulfur content for natural gas and the permit will specify the allowable fuel sulfur content for the natural gas at 0.8 weight percent in accordance with 40 CFR 60.333(b). The Title V permit will carry over the PSD Avoidance fuel oil sulfur content limit of 0.05 weight percent.

The facility is classified as a PSD Avoidance site for SO₂ emissions. This classification is maintained by the operational limit of 2500 hours per year and fuel oil sulfur content limit. The Division has determined that the fuel oil usage limit is superfluous. Hence it will not be carried over to their Title V permit. No sulfur content limit for the natural gas is necessary since potential SO₂ emissions while combusting natural gas is less than 250 tons per year.

PM/PM10 Emissions

PM emissions primarily result from incomplete combustion of distillate fuel oil. The potential PM emissions from the turbines, combined, is limited to not equal or exceed 250 tons during any twelve consecutive months by limiting distillate fuel oil usage. Westinghouse predicted a short term PM emission rate of approximately 57 lbs/hr while firing on distillate fuel oil which is higher than the AP-42 PM emission factors. Potential PM/PM10 emissions are computed as follows:

$$\text{PM/PM10 (TPY)} = (57 \text{ lbs/hr}) * (\text{hr}/1825 \text{ MMBtu}) * (30,354,609 \text{ gallons/yr}) * (141,000 \text{ Btu/gal}) * (1 \text{ ton}/2000 \text{ lbs})$$

$$\text{PM/PM10 (TPY)} = 67 \text{ tpy}$$

Note: The heating value of 1825 MMBtu/hr represents the lower heating value for fuel oil from the Title V permit application.

The AP-42 PM emission rates are based on AP-42 emission factors from Table 3.1-2 in the May 1998 draft edition. The PM emission rates based on AP-42 are computed as follows:

For natural gas combustion, based on information in the permit application -

$$\text{LHV} = 1783 \text{ MMBtu/hr}$$

$$\text{NOx} = (7.4 \text{ lb PM/MMscf}) * (1783 \text{ MMBtu/hr}) * (\text{scf}/1020 \text{ Btu}) = 13 \text{ lb/hr}$$

For distillate fuel oil combustion, based on information in the permit application -

$$\text{LHV} = 1825 \text{ MMBtu/hr}$$

$$\text{NOx} = (1.6 \text{ lbs PM}/1000 \text{ gal}) * (1825 \text{ MMBtu/hr}) * (\text{gal}/139,000 \text{ Btu}) = 21 \text{ lb/hr}$$

Visible Emissions

The allowable opacity limit is specified by Georgia Rule 391-3-1-.02(2)(b) and Georgia Rule 391-3-1-.03(2)(c). Georgia Rule (b) applies to this Equipment Group because the turbines are subject to at least one other emission limitation in Georgia Rule 391-3-1-.02(2), and this rule establishes a forty (40) percent opacity limit. For the purpose of the SIP Permit, EPD imposed a twenty (20) percent opacity limit. That decision has been revisited and EPD has determined that the Title V permit should only impose Georgia Rule (b) to limit opacity from each turbine.

Fuel Oil Storage Tanks TK01 and TK02

Storage tanks TK01 and TK02 are subject to NSPS Subpart Kb because each was constructed after July 23, 1984 and each has a storage capacity greater than 40 m³ (~10,568 gallons). Each tank has a potential design capacity of 635,000 gallons of No. 2 fuel oil which has a true vapor pressure of approximately 0.0074 psi. Based on this approximate vapor pressure, each tank is only subject to the record keeping requirements of 40 CFR 60.116b in accordance with 40 CFR 60.110b(c). [NSPS Kb emission standards apply for tanks the size of these if the non-water volatiles vapor pressure is at least 0.51 psia.]

Tank TK01 was installed in May 1999. Tank TK02 was installed December 13, 2000.

- D. Compliance Status - Refer to Section VII.F.
- E. Operational Flexibility - Refer to Section VII.A.
- F. Permit Conditions

Condition 3.2.1 specifies the PSD avoidance limit for NOx emissions from the turbines on a combined basis. This condition is taken from existing permit condition 2.1.

Condition 3.2.2 specifies the operational limit on the turbines on a combined basis for PSD avoidance purposes. This condition is taken from existing permit condition 2.2.

Condition 3.2.3 specifies the short term CO emission limit for each turbine for PSD avoidance purposes. This condition is taken from existing permit condition 2.4a.

Condition 3.2.4 specifies the maximum fuel sulfur content, by weight, for fuel consumed by the turbines. This condition is taken from existing permit condition 2.5.

Condition 3.3.1 specifies the NSPS GG allowable short term NOx emission rate. This condition is taken from existing permit condition 2.3.

Condition 3.3.2 specifies the NSPS GG allowable fuel sulfur content for natural gas burned in the combustion turbines.

Condition 3.4.1 specifies the allowable opacity limit from each combustion turbine in accordance with Georgia Rule (b).

Condition 3.4.2 specifies the allowable NOx emission rate from each combustion turbine in accordance with Georgia Rule (nnn). This permit condition becomes effective May 1, 2003 and shall apply during the period May 1 through September 30 of each year.

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

A. General Testing Requirements

A condition specifying that the Division can require emissions testing on any emissions unit is included. The test methods to be used to determine compliance with the limitations in Part 3 are listed and a general condition requiring notification of any test and submission of a test plan are also provided.

Condition 4.1.3 allows for the Director or his designee to make minor change in methodology, which are sometimes necessitated by process variable, changes in facility design, or improvements or corrections that render those methods or procedures more reliable.

B. Specific Testing Requirements:

Monroe Power has attempted to conduct the initial performance testing on combustion turbine CT02 as required by existing permit condition 4.3. Monroe Power has not been able to complete this testing due to operating problems with the unit, but the testing may be completed before this permit is issued. Hence, EPD will not include a performance testing requirement in the draft Title V permit for Monroe Power. EPD will reassess this decision before issuance of their final Title V permit (i.e., their existing SIP permit requirements are revoked).

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

Condition 5.1.1 requires that all monitors be operated continuously except during breakdowns and repairs. Any repairs or maintenance should be completed in an expeditious manner so downtime is minimized. All data should be recorded during any calibration activity to help verify that the calibration was performed and completed properly.

B. Specific Monitoring Requirements

Turbines CT01 and CT02 are subject to the requirements of Subpart GG for NO_x emissions and fuel sulfur content; Georgia Rule 391-3-1-.02(2)(b) for visible emissions; and Georgia Rules 391-3-1-.03(2)(c) for PSD avoidance purposes for NO_x, CO, SO₂, PM/PM₁₀, and VOC emissions.

NO_x Emissions

As noted in Part 3 of this narrative, NSPS GG limits the NO_x emissions to a maximum of approximately 103 ppmvd, at 15% oxygen. The tested NO_x emission rates on CT01, at loads ranging from approximately 30% to base load ranged from 85 to 42.6 ppmvd (15% oxygen) while firing natural gas; and from 64.6 to 70.5 ppmvd (15% oxygen) while firing fuel oil. To reasonably assure compliance with the NSPS GG NO_x emissions limitation, the Continuous Emissions Monitoring Systems (CEMS), required by the Acid Rain regulation, are used to monitor NO_x emissions.

EPA published an EPA Headquarter's determination, on March 12, 1993, which contains requirements when CEMS are used as an alternative means of monitoring NO_x emissions under NSPS GG. Since the testing provisions in 40 CFR 60.335(c)(1) requires that performance tests results be corrected to International Standards Organization (ISO) standard day conditions, CEMS results must also be expressed on this same basis in order to conclusively identify periods of excess emissions. [Note: An ISO Standard Day Condition is 288 deg Kelvin, 60 percent relative humidity, and 101.3 kilopascals of pressure.] The Monroe Power plant informed EPD on April 9, 2001 that they do not currently have the capability to monitor the ambient atmospheric conditions and the combustor inlet pressure. Procurement, installation, and operation of such monitoring devices could take as long as six months.

The Division will set the "Effective Date" of their final Title V permit as January 1, 2002 in order for timelines for Title IV and Title V to be concurrent (i.e., calendar year basis) even though the permit is expected to be issued before that date. As a side effect of doing this, Monroe Power will have adequate time to install the required monitoring prior to the issuance date of this Title V Permit. Hence, the Division does not believe their Title V permit needs to include an implementation period for the installation of the needed monitoring equipment. For any one-hour average NO_x concentration (ppm) converted to 15% oxygen that is greater than 72 ppm (70% of the allowable limitation), the Permittee is required to convert the NO_x concentration to ISO standard ambient conditions using the ambient data and combustor inlet pressure data. Any one-hour average NO_x concentration, which exceeds 103 ppmvd, at 15% oxygen and ISO standard ambient conditions, must be reported as an exceedance rather than an excess emission. NSPS GG defines an excess NO_x emission based on the tracking of the water-to-fuel ratio.

The CEMS is also used to determine the contribution of NO_x emissions on an annual basis from the turbines to verify compliance with the facility-wide PSD Avoidance NO_x emission limit of 250 tpy. This is further clarified in Part 6 of this narrative. The monitoring provisions of NSPS GG [40 CFR 60.334(c)(1)] use operating parameters (water-to-fuel rates and fuel nitrogen content) to identify periods of NO_x excess emissions. These turbines utilize water injection for NO_x reduction purposes during periods of distillate fuel oil firing. As noted earlier, these CTs are equipped with NO_x CEMs which will provide credible evidence regarding the unit's compliance status on a continuous basis following the initial tests. In this case, EPD believes there is enough justification to not require monitoring of the water-to-fuel ratio as required in 40 CFR 60.334(c)(1).

Operational Limits for PSD Avoidance Purposes - Fuel Oil Usage and Fuel Sulfur Content Limits

EPD requires that the natural gas and distillate fuel oil consumption by the turbines be continuously monitored and recorded and Monroe Power has installed a device on each turbine for measuring these parameters. Verification of compliance with the fuel sulfur limit and fuel oil usage limit for the turbines is discussed in Part 6 of this narrative.

Monroe Power equips the CTs with timers to track the cumulation of hours of operation which provides opportunity to verify compliance with the operational limit on the CTs.

CO Emissions

As noted earlier, there is still a need to limit hours of operation for purposes of limiting CO emissions below 250 tpy. Initial compliance with the hourly CO emission rate from each turbine is verified through an initial performance test. Monroe Power has conducted the initial performance test on CT01 and not CT02. They are required to conduct such testing on CT02. EPD investigated the need to verify ongoing compliance with the hourly CO emission limit of 200 lbs/hr. Testing on CT01 showed that the CO emissions were well below 200 lbs/hr (i.e., as much as 32% of the allowable) from 50% load to base load. Historically, EPD has chosen to restrict operation of turbines to below a specific load (except during startup and shutdown) in order to assure compliance with the applicable short term CO emissions limit. In this case, the tested CO emission rate (irregardless of fuel type) shows compliance with the allowable CO emission rate of 200 lbs/hr from 50% load to base load. Hence, a new condition is included which prohibits the operation of CT01 and CT02 below 110 MW (natural gas firing) and 98 MW (fuel oil firing), except during periods of startup or shutdown. A new monitoring requirement is included which requires that the Permittee determine and record the electrical output (in MWs) for each CT. Monroe Power voiced concern about these megawatt levels, on April 9, 2001, indicating that they were too high. They were unable to propose an alternative as of the submittal of this narrative.

Visible Emissions

Natural gas and distillate fuel oil are clean burning fuels and the likelihood of violating the forty (40) percent opacity standard in Georgia Rule 391-3-1-.02(2)(b) is minimal. Thus no additional periodic monitoring is prescribed. EPD does want to point out in this Title V narrative that they are aware of citizen concern about visible emissions from this plant when the turbines are started up on fuel oil. In some cases, visible emissions are present from the facility during such an episode. If the opacity of the visible emissions during startup or shutdown is greater than forty percent, than EPD would make a decision as to whether those excess emissions can be provided as allowed by Georgia Rule 391-3-1-.02(a)(7). See "*Comments on Startup and Shutdown*" for further discussion on this topic.

Comments on Startup and Shutdown

EPD believes that it is important to clarify how excess emissions are viewed during periods of startup and shutdown. In addition, EPD wants to clarify how it believes the Title V permit is designed to maintain the PSD Avoidance status of the facility when including emissions from startup and shutdown.

In accordance with Georgia Rule 391-3-1-.02(a)(7), excess emissions resulting from startup, shutdown, malfunction of any source which occur through which ordinary diligence is employed shall be allowed provided that: (1) the best operational practices to minimize emissions are adhered to; (2) all associated air pollution control equipment is operated in a manner consistent with good air pollution control practice for minimizing emissions; and (3) the duration of excess emissions is minimized. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown or malfunction are prohibited and are violations of the Permit.

Monroe Power utilizes NOx CEMS to track NOx emissions during startup, shutdown, malfunction, and normal source operation. This type of periodic monitoring is more than sufficient to track NOx emissions from any type of operational scenario in order to track compliance with the PSD Avoidance status for this pollutant.

VI. Other 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 requirement. 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

Verification of Compliance with the NOx Emission Rate

Compliance with the twelve month rolling total NOx emission rate from the CTs is tracked using the NOx CEMS data to compute the combined NOx mass emission rate. The NOx mass emission rate from the turbines is to be computed by multiplying the total NOx emissions in units of lb/MMBtu, as determined in accordance with the procedures of 40 CFR Part 75, by the total heat input determined from the turbine fuel usage records. Monroe Power is required to maintain monthly records which specify the twelve consecutive month total NOx emissions (in tons) from CT01 and CT02, combined. Failure to maintain NOx emissions from CT01 and CT02, combined, below 250 tons during any twelve consecutive months must be reported as an exceedance.

Verification of Compliance with the Operational Limits on the Turbines

The hours of operation of each turbine is tracked by an hours meter which is required by Condition 5.2.2. The Title V permit requires the maintenance of records specifying the hours of operation of the turbines combined. An exceedance is defined as any rolling annual total hours of operation which exceeds 2500.

NSPS Kb Requirements

As noted earlier in the narrative, fuel oil storage tanks TK01 and TK02 are subject to the NSPS Kb requirements specified in 40 CFR 60.116b. The requirements of 40 CFR 60.116b are specified in Part 6 of Monroe Power's Title V permit.

Verification of Compliance with Fuel Sulfur Content Limits

The fuel sulfur content limit for the fuel oil consumed by the turbines is 0.05 weight percent, respectively. NSPS GG [see 40 CFR 60.334(b)(2)] requires daily monitoring of the sulfur and nitrogen content of the fuels supplied without intermediate bulk storage [i.e., in this case natural gas]. EPD believes that a waiver of the nitrogen monitoring requirement for natural gas is acceptable based upon the fact that NOx emissions are measured by a continuous emissions monitoring system (CEMS) and because pipeline natural gas does not contain fuel-bound nitrogen that would generate NOx emissions. EPA has approved such a waiver [See August 14, 1987 Memo - EPA Custom Fuel Monitoring Policy].

Monroe Power receives its pipeline natural gas from TRANSCO. Historically, the Division has allowed a semi-annual analysis of the sulfur content of the TRANSCO natural gas pipeline instead of daily sampling even though the Division has not received a waiver from EPA to reduce the frequency of monitoring from daily to semi-annual for this pipeline. The Division has been receiving semiannual reports from TRANSCO which shows the sulfur content of its gas to be much less than 0.1 percent. The Division did not, and does not, believe that there is anything to be gained by requiring a sulfur analysis on a schedule more frequent than semiannual. Thus, the existing semi-annual monitoring and reporting requirements for natural gas sulfur content are carried over to their Title V permit.

NSPS GG [see 40 CFR 60.334(b)(1)] requires monitoring of the sulfur and nitrogen content of the fuel supplied from a bulk storage tank [i.e., in this case distillate fuel oil] on each occasion that fuel is transferred to the storage tank from any other source. EPA Region 4 has approved alternatives to these requirements for owners and operators that use large bulk storage tanks, like Monroe Power, to supply oil to their CTs. Region 4 has allowed owners and operators

that receive oil in tanker trucks to use vendor analyses to satisfy the oil nitrogen and sulfur monitoring requirements under Subpart GG. The Acid Rain Provisions requires manual sampling of the bulk storage tank or fuel flow line every day that the CTs combust oil. EPA has provided a waiver to owners and operators of the requirement to determine the nitrogen content of the oil burned in a CT in cases where NOx excess emissions are monitored using a CEMs.

In a letter to EPD dated May 19, 1999, Monroe Power proposed that the fuel oil monitoring requirements under Subpart GG and Acid Rain be accomplished as follows:

“The fuel oil supplier (Valero) utilizes a single tank for low sulfur fuel oil. Whenever oil is delivered from the pipeline into this supply tank a sample is taken of the tank and analyzed. If a shipment (multiple trucks) of oil is then delivered to the Monroe Power Plant storage tank, a sample portion will be delivered with the oil. This sample and its analysis will be used to determine the sulfur, nitrogen, specific gravity and heat value of the oil. Given this arrangement, we petition the Administrator to allow Monroe Power Company, in lieu of daily sampling, to sample the supplier’s tank whenever this tank receives oil. Representative samples of the fuel oil will be collected in accordance with ASTM D4057-88. This periodic sample would be similar to daily as-fired fuel oil samples since any new shipments would be sampled prior to delivery [per 40 CFR Part 75, Appendix D, Section 2.2.1.2].”

EPD will implement an EPA approved monitoring schedule as defined in their May 26, 2000 memo [*May 26, 2000 - EPA Region 4 Memo - “Approval of Routine Alternative Testing and Monitoring Procedures for Combustion Turbines Regulated Under New Source Performance Standards*]. The Title V permit will allow Monroe Power to monitor the sulfur content using “as-delivered” samples instead of samples collected from their own storage tank. EPD believes that this method of compliance is acceptable if the sulfur content of all the fuel oil delivered meets the applicable limits since the average sulfur content of the fuel oil in the storage tank would meet the applicable limits by default under this scenario.

Note: Monroe Power was informed of EPD’s decision to clarify language in existing SIP permit condition 5.1 by proposing new Title V permit condition 6.2.3. Condition 6.2.3 implements the monitoring protocol in Monroe Power’s letter to EPD dated May 19, 1999. Monroe Power voiced concern to EPD on April 12, 2001 that they prefer the Title V permit maintain the existing language for fuel sulfur monitoring as found in existing SIP permit condition 5.1. This existing condition states that “The Permittee shall comply with all applicable requirements of the continuous monitoring rule in 40 CFR 75. The Permittee by meeting these requirements shall be considered as meeting the requirements in 40 CFR 60.334(b) and shall be considered to be complying with the requirements for having a custom fuel monitoring schedule under 40 CFR 60.334(b)(2). EPD has considered Monroe Power’s request and is not inclined to revise the proposed language because Monroe Power has not shown EPD why the proposed language presents a monitoring protocol which is different from what the company is already implementing.

In summary, Monroe Power will be required to receive fuel supplier certifications which include the following: (1) the location of the fuel oil when the sample was drawn for analysis; (2) the sulfur content of the oil from which the shipment came (or of the shipment itself); (3) the method used to determine the sulfur content of the oil; and (4) the quantity of the oil shipment delivered to the facility. An excursion is defined as any value of the fuel oil sulfur content which exceeds 0.05 weight percent.

Reporting Requirements

Condition 6.1.4 outlines the semiannual reporting requirements. Condition 6.2.12 specifies additional parameters which must be included in these semiannual reports. The additional parameters are:

- Monroe Power must include the twelve consecutive month total NOx emissions (tons) from CT01 and CT02 combined for each month in the reporting period.
- If there are no excess NOx emissions, as defined by Condition 6.1.7.ii, Monroe Power must so note that in the semiannual report to the Division.

- The twelve consecutive month total hours of operation of turbines CT01 and CT02 combined for each month in the reporting period.
- The fuel oil supplier certifications for each shipment of fuel oil received during the reporting period and a statement signed by a responsible official that the records of fuel supplier certifications submitted represent all of the fuel oil received during the semiannual reporting period. If no fuel oil has been received during the reporting period, the report should so state.

VII. Specific Requirements

A. Operational Flexibility

This permit includes the standard conditions allowing section 502(b)(10) changes and off-permit changes. Additional operational flexibility provisions do not need to be incorporated into this Title V Permit as their permit already provides sufficient flexibility for the facility. The applicant did not include any alternative operating scenarios in their Title V permit application.

B. Alternative Requirements

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

C. Insignificant Activities

A list of insignificant activities is attached at the end of the Title V Permit. These insignificant emission units may also be seen in Section 4.10 and 4.50 of the Title V permit application.

D. Temporary Sources

This section is not applicable to this facility. 40 CFR 70.6(e) requires Georgia EPD to provide for the permitting of certain types of temporary sources. This facility currently has no such sources and is unlikely to have such sources in the future. However, they may add temporary sources provided that the facility follows any necessary regulatory procedures for the operation of such sources. This may include amending the Title V permit, if necessary.

E. Short-Term Activities

Monroe Power has not requested permission to operate any short-term activities.

F. Compliance Schedule/Progress Reports

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

G. Emissions Trading

The facility is not involved in any emissions trading programs.

H. Acid Rain Requirements

This facility is subject to requirements in Title IV of the Clean Air Act. They are subject to 40 CFR 72 (permits), 73 (sulfur dioxide), and 75 (monitoring). They are not subject to the nitrogen oxide provisions (40 CFR 76) of the

Acid Rain regulations because the turbines do not have the capability to burn coal. Each of the turbines is an affected unit under the Acid Rain regulations.

The Monroe Power Plant was issued a Phase II Acid Rain permit by EPD on June 15, 1999 (Permit No. 4911-297-0040-E-02-0). The facility is required, under 40 CFR 75, to monitor certain pollutants and parameters, including NO_x emissions, SO₂ emissions, CO₂ emissions, flowrate, and heat input. These pollutants and parameters are reported directly to EPA, electronically, on a quarterly basis.

The Phase II Permit Application for the Monroe Power Plant is attached to the Title V permit as part of the Permit to ensure that all Acid Rain applicable requirements are incorporated into the Title V permit.

I. Prevention of Accidental Releases

This facility is not subject to the requirements of 40 CFR 68.

J. Stratospheric Ozone Protection Requirements

The facility noted in their Title V permit application that they do not operate equipment subject to the Title VI regulations.

K. Pollution Prevention

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

L. Specific Conditions

None

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

On June 5, 2001, the Division issued a draft Title V operating permit to the Monroe Power Plant located in Monroe, Georgia. The public notice for this permit was published in The Walton Tribune on June 27, 2001. The public comment period expired on July 27, 2001. Comments were received from Monroe Power Company on July 25, 2001. Comments were received from the Georgia Center for Law in the Public Interest, on behalf of the Georgia Chapter of the Sierra Club, via electronic mail, on July 27, 2001.

Review of Monroe Power Comments

1. **Permit Cover Page**

They corrected the street address for the plant.

Response: The Division has revised the permit cover page accordingly.

2. **Condition 3.3.2**

The company requests that the phrase "weight percent" be changed to "percent by weight."

Response: The Division has made this revision.

3. **Condition 3.4.2**

Monroe Power voiced concern that the plant will be subject to the NOx emission standard specified by Georgia Rule 391-3-1-.02(2)(nnn)1.(i) during the ozone season starting May 1, 2003. They noted that this will require that they only combust natural gas during the ozone season since the NOx emissions from their turbines burning fuel oil do not yet meet this emission standard. They asked that the permit provide for special provisions for burning fuel oil during the ozone season by the incorporation of a new permit condition.

Response: Condition 3.4.2 does not explicitly deny the Permittee the right to burn fuel oil during the ozone season. If the NOx emissions while burning fuel oil do not comply with the applicable requirement, then the Permittee shouldn't burn fuel oil. Also, Georgia Rule (nnn) does not provide for a "waiver" as requested by the Permittee. The Division will not change this condition nor add a new condition based on this comment.

4. **Condition Nos. 5.2.2.c and 6.2.5**

Condition 5.2.2.c requires the installation and operating of a meter on each combustion turbine to record the cumulation of hours of operation which shows all periods of operation of the combustion turbine. Condition 6.2.5 defines the record keeping requirements for this monitoring condition. Monroe Power asked that the word "meter" be changed to "monitor" since they will use the NOx Continuous Emissions Monitoring System to track and record hours of operation.

Response: The Division has revised these conditions as requested.

5. **Condition 5.2.6**

Condition 5.2.6 specifies the requirement to correct the measured NOx emission rate to International Standards Organization (ISO) standard ambient conditions when the measured NOx emission rate is in excess of 72 ppmv at 15% oxygen. Monroe Power noted that the condition needs to allow for an implementation period as their NOx Continuous Emissions Monitoring System (CEMS) is not capable of making this conversion at the present time. They request that the condition be revised to allow for a 120 day period to comply with the requirements of this condition in order to engage in software modifications/changes for the existing CEMS system.

Response: The Division has revised this condition as requested.

6. **Condition 6.1.3**

Monroe Power voiced concern that the condition as written requires as a matter of routine submittal of “negative reports.” They request that the following wording be incorporated into this condition: “For periods during which there are no reportable events, submittal of a written report by the Permittee shall not be required.”

Response: The Division maintains that the requirements of Condition 6.1.3 meet the requirements of 40 CFR 70.6(a)(3)(iii)(B) and the Permittee has not provided evidence that their revision meets these requirements. The Division will not change this condition based on this comment.

7. **Condition 6.1.7.b.iii**

Condition 6.1.7.b.iii defines an exceedance for purposes of the sulfur content of the fuel oil burned in the combustion turbines. The condition states that an exceedance exists any time that the Permittee burns a fuel oil whose sulfur content exceeds 0.05 percent by weight. Monroe Power voiced concern that such a definition is too stringent and that the condition should be revised to read: “Any time the fuel oil sulfur content, as described in Condition 6.2.3 and averaged over a calendar quarter, exceeds 0.05 percent by weight.” The Permittee continues that the proposed revision more correctly describes the process for determining sulfur levels in the fuel oil and adds an averaging time for the limit. The averaging time allows for possible minor variations in the sulfur level of individual orders that could be beyond the Company’s control.

Response: The Division’s response to this comment is inherently tied to our discussion for Condition 6.2.3 found later in this narrative. SIP Permit Condition 2.7e defines a period of excess emissions of sulfur dioxide that shall be reported as any semiannual period during which the sulfur content of the fuel being fired in a turbine exceeds 0.05 weight percent. The Division determined that this condition is only valid for natural gas (since Condition 5.4 required the natural gas to be analyzed semiannually) and not for fuel oil. Thus, the Division has clarified this in the development of the Title V permit (Condition Nos. 6.2.3 and 6.1.7.b.iii).

Monroe Power voiced concern that the condition requires real-time monitoring of the sulfur level in the fuel oil just prior to combustion. The Division assures Monroe Power that such monitoring is not necessary to verify that the turbine is not firing a fuel oil whose sulfur content exceeds 0.05 weight percent. An exceedance as defined in Condition 6.1.7.b.iii has occurred if a storage tank contains a fuel oil whose sulfur content is greater than 0.05 weight percent and this fuel oil is burned in the turbine. An exceedance, as defined in Condition 6.1.7.b.iii, has not occurred if the fuel oil, in this case, was not burned in the turbine.

The Division has not revised this condition based on this comment.

8. **Condition 6.1.7.b.v**

Monroe Power incorrectly referred to Condition 6.1.7.b.iii. The correct reference is 6.1.7.b.v. Condition 6.1.7.b.v defines an exceedance as any three-hour average in which the NOx concentration from any turbine exceeds the Georgia Rule (nnn) standard. Monroe Power voiced concern that the draft permit does not offer an origin of this particular averaging period. They continued their argument that the requirements of Georgia Rule (nnn) seem unfair and that the averaging period in Condition 6.1.7.b.v should be on a 24 hour block average.

Response: The emission limitation/standard in Georgia Rule (nnn) is tied to or based on the run time(s) specified for the applicable reference test method(s) or procedures required for demonstrating compliance. The applicable reference test method in this case is Method 7E. The Division has corrected Condition 4.1.3.f to read as follows: “Method 7E shall be used for the determination of the concentration of oxides of nitrogen from combustion turbines CT01 and CT02 for purpose of verifying compliance with Georgia Rule 391-3-1-.02(2)(nnn). The sampling time for each run shall be one hour.” With this revision, the averaging period, as specified by Method 7E, is 3 hours. The commenter is reminded that

the comment period for Georgia Rule (nnn) has already ended and the rule, as written, is a promulgated rule. The Division will not revise this condition based on this comment.

9. Condition 6.2.3

Condition 6.2.3 requires that the Permittee verify and document that each shipment of fuel oil received for combustion in turbines CT01 and CT02 complies with the requirements of Condition 3.2.4. The permit specifies two different ways of complying with this requirement. One way is to obtain fuel oil receipts for each fuel oil shipment which contains such a certification. Monroe noted that the primary planned fuel delivery for the plant is via tanker trucks, with several trucks (perhaps 20 trucks) actually delivering fuel oil under an order placed by the Company with a supplier. The Company monitoring plan would have the tank sampled after each “order” (multiple tanker truck loads) is added to the tank. With this in mind, Monroe requests that the phrase “each shipment” be changed to “each order.”

Response: SIP Permit No. 4911-297-0040-E-04-0, Condition 2.7b, requires that the sulfur content of each shipment of fuel oil to the plant shall be monitored. The Division contacted Monroe Power to seek further clarification on the current practice of verifying compliance with the fuel sulfur content limit in their SIP permit. The plant receives a “shipment” which represents multiple tanker truck deliveries. The number of trucks is dependent on the amount of fuel oil to be delivered per the “order.” Each truck that delivers fuel oil has a fuel oil sulfur content certification and this certification is required by the facility to be presented before any unloading can take place. The certification certifies that the fuel oil is “low sulfur” distillate fuel oil. According to the facility, “low sulfur” refers to a sulfur content of less than 0.05 weight percent.

The intent of Title V Condition 6.2.3 is the same as Condition 2.7b in SIP Permit No. 4911-297-0040-E-04-0. Monroe Power demonstrates compliance by obtaining a certification from the fuel supplier that the fuel oil, as delivered, complies with the permit requirements. Condition 6.2.3 also allows for an alternative method of compliance which allows for the analysis of the fuel oil. A “shipment”, as used in the permit, can consist of multiple truckloads. Therefore, in accordance with Condition 6.2.3, and in order to verify compliance with the fuel oil sulfur limit in Condition 3.2.4, Monroe Power can obtain fuel oil supplier certifications for each shipment as described in paragraph (a) or analyze the sulfur content in the fuel oil tank after the shipment is completed as described in paragraph (b) (provided that no fuel oil is burned from the tank until the shipment is completed). Condition 6.2.3 is not revised based on this comment.

Review of Comments from the Georgia Center for Law in the Public Interest

1. EPD’S PUBLIC NOTICE PROCEDURES ARE NOT ADEQUATE

Comment: The Environmental Protection Division (EPD) did not undertake the required public participation activities for this draft permit. Therefore, EPD may not issue the final permit. 40 CFR §70.7(a)(1)(ii). Rather, EPD must re-notice the draft permit for a new public comment period that follows, at a minimum, the public participation processes specified in the law.

Response: For this draft Title V permit, EPD carried out its standard procedure for public participation that is has used for draft Title V permits for the past few years. EPD has reviewed its Title V public participation process and has determined that it conforms to the Part 70 requirements, except as may be noted below. EPD has incorporated some of the changes suggested by the commenter in order to improve the public participation process.

Comment: 40 CFR §70.7(h)(2) states that the public notice will explain where the public can review all relevant supporting documents. EPD’s public notice states that all relevant information is available at the Air Protection Branch in Suite 120. This may not be accurate. For example, relevant information may be located in an EPD regional office. In addition, information relevant to accidental releases under Clean Air Act § 112(r) may be located at other agencies. EPD has recently stated an intent to provide the public with a list of where all of the information is available. However, we are unaware that such information has been made available.

Response: All information used in the development of the draft Title V permit is located at the Air Protection Branch as indicated in the public notice.

Comment: The public notice also contains inaccurate information. For example, the notice states, “[t]his permit will be enforceable by the Georgia EPD and the U.S. Environmental Protection Agency.” This statement is incomplete. The permit will also be enforceable by any “person.” 42 U.S.C. §7604(a). The Clean Air Act defines “person” to include an individual, corporation, partnership, association, State, municipality, and a political subdivision of a state. 42 U.S.C. §7602(e).

Response: The commenter correctly noted that the permit, when issued, will be enforceable by the public. The Division believes that the current, standardized public notice is correct as published and fulfills all the requirements for such notices as set forth by the Act and the U.S. EPA. However, EPD has examined the wording of the public notice in light of this comment and has modified it slightly for future public notices (as the commenter is aware) in order to properly encourage the participation of all persons.

Comment: While this oversight may appear insignificant, correcting this misstatement is important for at least two reasons. To begin with, it is inherently important for the government to always provide the public with accurate information regarding implementation of air pollution laws. In addition, EPD has recognized that public involvement in the Operating Permit program has been limited. The onus is on the state agency to involve people in the regulatory process. 40 C.F.R. §70.7(h). It is only with full and meaningful public participation that we can hope to have clean air here in Georgia. See generally Ashley Schannauer, Science and Policy in Risk Assessment: The Need for Effective Public Participation, 24 Vermont Law Review 31 (1999). In order to involve the public in the Operating Permit program, an important first step is to convince the public that this program is a legitimate means by which the public can participate to achieve the goal of attaining clean air. If the public is aware of their right to enforce a permit, they are more likely to put effort into ensuring that the permit is adequately protective of the environment.

Furthermore, the public notice states that “[a]fter the comment period has expired, the EPD will consider all comments, make any necessary changes and issue the Title V operating permit.” This statement is inaccurate. Specifically, the statement suggests that, while changes may be made, in the end, the permit *will* be issued. However, under certain circumstances, EPD is required to refuse to issue a Title V permit. 40 CFR §70.7(a). As such, the aforementioned statement could be interpreted as an indication of EPD’s predisposition to issue Title V permits regardless of whether the permit complies with the law. See American Wildlands v. Forest Service, CV 97-160-M-DWM (D.Mont. Apr. 16, 1999) (Denying government deference because of evidence of predisposition towards a predetermined outcome). Therefore, we suggest that EPD include an additional statement that it will make a determination of whether to issue the permit.

Response: EPD has determined that the language in the public notice meets the Public Notification requirements of 40 CFR 70.7(h)(2). EPD has not received any information to indicate that a Part 70 operating permit should be denied for this facility.

2. THE PERMIT IMPERMISSIBLY LIMITS ENFORCEMENT TO “CITIZENS OF THE UNITED STATES.”

Section 8.2.1 of the draft permit claims to limit enforcement to citizens of the United States. However, the Clean Air Act states that any person can take an enforcement action. 42 U.S.C. § 7604(a). Therefore, the permit must be changed to state that any person can enforce this permit. Furthermore, the permit is misleading by including mention of the public’s right to sue under a section entitled “EPA Authority.” We recommend that EPD create a separate section, which discusses the public’s right to sue under a heading such as “Public’s Enforcement Authority.”

Sierra Club has raised this issue in prior comments on other Title V proposed permits. Nevertheless, no changes have been made to the permit template. This may be an indication that EPD needs to establish or improve a system to capture and implement lessons learned. It may also be an indication that EPD does not have the ability to maintain a fully delegated Title V program.

Response: The language of Condition 8.2.1 was derived from 40 CFR Part §70.6(b)(1), which states that Part 70 permits “are enforceable by the Administrator and citizens under the Act.” Neither the public notice nor the language in Condition 8.2.1 of the permit affects the fact that any person, as authorized by the Act, can enforce the permit. EPD has removed the phrase “of the United States” to be consistent with 40 CFR 70.6(b)(1).

3. THE PERMIT MUST REQUIRE THE PERMITTEE TO SUBMIT ALL MONITORING INFORMATION TO EPD

Comment: 40 CFR §70.6(a)(3)(iii)(A) and 42 U.S.C. §7661(c)(a) require that permits issued by state agencies include a condition for submittal of reports of any required monitoring at least every six months. The permit does not contain any such requirement.

EPD may claim that condition 6.1.4 of the permit satisfies the requirements of §70.6(a)(3)(iii)(A). However, condition 6.1.4 requires reporting of excess emissions, exceedances and/or excursions. The reporting of these deviations is required by §70.6(a)(iii)(B). However, § 70.6(a)(iii)(A) requires reporting of all monitoring. It is cardinal rule of statutory and regulatory interpretation that a regulation should be interpreted in such a manner as to not render any provision of the regulation meaningless. However, EPD’s claim that reporting of deviations constitutes reporting of any required monitoring renders §70.6(a)(iii)(A) meaningless as it would be redundant to §70.6(a)(iii)(B).

It is true that Condition 6.1.4.b does require bi-annual reporting of total process operating time during each reporting period. While this certainly is a small step towards compliance with § 70.6(a)(iii)(A), that subsection requires reporting of *all* monitoring. Total processing time is just one monitoring requirement.

Response: The section of the United States Code cited by the commenter requires that the Permittee submit, no less than every six months, the results of any required monitoring. 40 CFR 70.6(a)(3)(iii) and Georgia Rule 391-3-1-.03(10)(d)1.(i), which incorporates the federal requirements by reference, require the submittal, at least of every six months, of reports of any required monitoring. These citations do not require the submittal of copies of all monitoring data recorded by the Permittee; rather, they require submittal of reports on the results of this monitoring. Condition 5.3.1 of the permit, for which these comments were submitted, requires such reports to be submitted semi-annually, by July 30 and January 30, for the preceding calendar semi-annual periods of each year.

The EPA has noted in a July 7, 1993 document entitled “Questions and Answers on The Requirements of Operating Permits Program Regulations” that the permittee is not required to submit raw data on monitoring/testing as part of its monitoring reports. The permittee is required to keep required monitoring data and support information. Support information includes all calibration and maintenance records for continuous monitoring, and copies of all reports required by the permit. Reports are required to contain the results of the monitoring required in the permit.

The permit has therefore not been modified in response to this comment.

4. THE PERMIT CANNOT LIMIT CREDIBLE EVIDENCE FROM BEING USED IN AN ENFORCEMENT ACTION

As emphasized by the United States Environmental Protection Agency’s (EPA) Credible Evidence Rule, 62 FR 8314 (Feb. 24, 1997), the Clean Air Act (CAA) allows the public, EPD, EPA, and the regulated facility to rely upon any credible evidence to demonstrate violations of or compliance with the terms and conditions of a Title V operating permit. Specifically, EPA revised 40 CFR §51.212, 51.12, 52.30, 60.11 and 61.12 to “make clear that enforcement authorities can prosecute actions based exclusively on any credible evidence, without the need to rely on any data from a particular reference test.” 62 FR at 8316. EPD must ensure that no permit purports to limit the use of credible evidence. Moreover, the permit should include standard language stating that all credible evidence may be used.

A. EPD Must Remove Language that Purports to Limit Credible Evidence

EPD must ensure that its Title V permits contain no language that could be interpreted to limit credible evidence. For example, condition 4.1.3 in Monroe Power Plant's permit states that "[t]he methods for the determination of compliance with emissions limits listed under Section 3.4 and 3.5 which pertains to the emission units listed in Section 3.1 are as follows:" One could read this provision to stand for the proposition that when a government agency or member of the public takes an enforcement action for a permittee violating its permit, the enforcer can only rely on information from the methods of determination listed in the permit. This position is directly contrary to the Clean Air Act requirements in CAA §§113(a), 113(e)(1) and 40 CFR § 51.212, 51.12, 52.30, 60.11 and 61.12 which allow anyone taking an enforcement action to rely on any credible evidence. Therefore, the aforementioned sentence in Section 4.1.3 should be stricken.

Another example of the permit's attempt to limit credible evidence is found in the second sentence of condition 8.17.1. This condition claims to limit usable evidence to information that is available to EPD. Of course, the public or EPA may obtain information about a facility from sources other EPD such as information from a "whistleblower" or from people that live near the facility. As such, it is inappropriate to limit credible evidence to exclude such information. Therefore, the aforementioned provision must be removed from the permit. Of course, the preferred option is to simply remove the sentence. A less desirable option is to re-write it to state that "EPD may determine . . ."

Similarly, Condition 6.1.3 of the permit, which states that "failures shall be determined through observation, data from any monitoring protocol, or by any other monitoring which is required by the permit," could be considered to limit the use of credible evidence. To correct the problem, this Condition should include an additional clause requiring reporting of any failure based on any credible evidence, as well as observation, data from monitoring protocols and other monitoring required by the permit.

B. EPD Should Include Standard Language in the Permit that Explicitly States that Anyone Can Use Any Credible Evidence

The permit does not affirmatively state that any credible evidence may be used in an enforcement action. EPA supports the inclusion of credible evidence language in all Title V permits. As explained by the Acting Chief of US EPA's Air Programs branch:

It is the United States Environmental Protection Agency's position that the general language addressing the use of credible evidence is necessary to make it clear that despite any other language contained in the permit, credible evidence can be used to show compliance or noncompliance with applicable requirements. . . . [A] regulated entity could construe the language to mean that the methods for demonstrating compliance specified in the permit are the only methods admissible to demonstrate violation of the permit terms. It is important that Title V permits not lend themselves to this improper construction.

Letter from Cheryl L. Newton, Acting Chief, Air Programs Branch, EPA, to Robert F. Hodanbosi, Chief, Division of Air Pollution Control, Ohio Environmental Protection Agency, dated October 30, 1998. In fact, EPA apparently sent a letter in May 1998 specifically directing EPD to amend its SIP to include language clarifying that any credible evidence may be used. Nevertheless, while three years have elapsed since EPA's request, the permit does not contain the necessary language.

While anyone may rely on *all* credible evidence regardless of whether this condition appears in the permit, EPD should include credible evidence language in the permits and permit template to make the point clear. Specifically, EPA has recommended that the following language be included in all Title V permits:

Notwithstanding the conditions of this permit that state specific methods that may be used to assess compliance or noncompliance with applicable requirements, other credible evidence may be used to demonstrate compliance or noncompliance.

Letter from Stephen Rothblatt, Acting Director, Air and Radiation Division, US EPA, to Paul Deubenetzky, Indiana Department of Environmental Management, dated July 28, 1998. We request that EPD include this provision in the permit to clarify the availability of any credible evidence to demonstrate noncompliance with permit requirements.

Response: The Division believes that adequate provisions for consideration of credible evidence have been included in Condition 8.17.1, which states, in part, that “Determination of whether acceptable operating and maintenance procedures are being used will be based on any information available to the Division which may include, but is not limited to, monitoring results, observations of the opacity or other characteristics of emissions, review of operating and maintenance procedures or records, and inspection or surveillance of the source.”

Furthermore, the prescribed performance test methods and procedures, which are incorporated in the Georgia Rules for Air Quality Control, contain clear provisions that, by prescribing such procedures, nothing would preclude the additional use of other credible evidence, either for compliance certifications or for establishing whether or not a source is in violation of any emissions limitation or standard. [See Rule 391-3-1-.02(3)(a) and the referenced Procedures for Testing and Monitoring Sources of Air Pollutants at Section 1.3(g).] Even without this direct inclusion, the Rules themselves are cited in all permits issued by the Division.

The Division has elected not to include any additional language beyond the Rules cited above because it is our belief that any attempt to clarify the rule or define credible evidence will generally produce an impression of limiting of the scope of the rule. This we do not wish to do. The Division believes that any challenge would easily be turned away. On the other hand, if limiting language such as that offered in the referenced EPA text were to be used, arguments to use such statements to “whither away” at the general principle could and most probably would be made. For instance, petitioners might suggest that the statement was only meant to apply to stated test methods and not work practice or other parts of the applicable standards, including the general provisions to the rules. Therefore, for the benefit of the enforceability of the standards by using any credible evidence available, the permit need not and is not being modified.

5. THE PERMIT MUST REQUIRE THE PERMITTEE TO REPORT ALL EXCEEDANCES, EXCURSIONS AND EXCESS EMISSIONS.

Comment: Condition 6.1.7 limits the exceedances, excursions and excess emissions that the facility must report. This needs to be removed because 40 C.F.R. §70.6(a)(3)(iii)(B) and (6)(i) mandates that the permit require the permittee to report all exceedances, excesses and excursions.

Response: The Division agrees that all exceedances, excursions and excesses be reported and therefore Condition 6.1.4 of the proposed permit states, “The Permittee shall submit a written report containing any excess emissions, exceedances, and/or excursions...” Condition 6.1.7, by listing explicitly what constitutes an excess emission, exceedance, and excursion, makes this requirement practically enforceable.

6. THE PERMIT DOES NOT FULLY INCLUDE THE ACCIDENTAL RELEASE REQUIREMENTS

Comment: Section 112(r) of the Clean Air Act sets out the requirements for stationary sources to avoid and address the accidental release of hazardous substances. 42 U.S.C. §7412(r). Section 112(r) is an applicable requirement under Title V and therefore must be included in Title V permits. 40 C.F.R. §70.2(Applicable Requirements (4)).

However, the permit does not contain this requirement in its entirety. While the Permit does state that “the Permittee shall submit a Risk Management Plan (RMP) in accordance with the 40 CFR Part 68, when and if, such requirement becomes applicable,” Section 7.10.1, it fails to require that the permit comply with its Risk Management Plan or with any other requirement under Part 68 or Section 112(r). For example, 42 U.S.C. §7412(r)(7)(E) requires that the operator of a source subject to Part 68 operate its facility in compliance with Part 68. Therefore, EPD needs to completely incorporate Section 112(r) and Part 68 into Section 7.10 of the permit.

Response: As indicated in the text of the comment, EPD includes the 112(r) requirements in Condition 7.10.1 of Title V permits. EPD has reviewed language of condition 7.10.1 and has modified it in order to better reflect the requirements of 112(r).

7. THE PERMIT MUST CONTAIN A CASE-BY-CASE MACT

Note: The following comment is taken verbatim from their July 27, 2001 letter. The EPD has not corrected any typographical errors found in their comment.

Comment: EPD determined not to apply a case-by-case MACT standard. However, EPA data shows that various facilities' formaldehyde emissions range by four orders of magnitude. Using worst case emission facts, this Facility would indeed be a major source of hazardous air pollutants. Therefore, the permit must contain a case-by-case MACT until such time as the EPA issues the final stationary combustion turbine MACT standard. However, should EPD reject this position, it should, at a bare minimum, require the Facility to test for HAPs during the initial performance test. These tests should be done at various loads.

Response: The Division reviewed its decision that the facility is not a major source of hazardous air pollutants (HAPs), in particular for formaldehyde. Formaldehyde emissions primarily result from the combustion of natural gas and not fuel oil. Thus, the Division only reviewed its decision based on natural gas combustion. The commenter provided no formaldehyde emission factor data or specific references to provide insight as to the magnitude of the emission factors they believe or surmise are appropriate. Thus the Division finds the commenters proposal to be without support.

EPA has several published documents and/or memorandums which cite certain individual hazardous air pollutants (HAPs) emission factors. The maximum heat input for natural gas is approximately 1783 MMBtu/hr per turbine and each turbine can generate as much as 184 MW. The turbines are limited to a combined operational limit of 2500 hours per year. The Division is aware that published EPA formaldehyde emission factors from natural gas fired combustion turbines rated at approximately 170 MW are 7.00×10^{-4} lb/MMBtu [EPA Access Database contained in EPA Memo dated December 30, 1999 from Sims Roy for 170 MW turbines], 6.49×10^{-5} lb/MMBtu and 2.02×10^{-4} lb/MMBtu [Both from EPA Memo dated August 21, 2001 for lean premix combustion turbines firing natural gas]. Based on this data the potential formaldehyde emissions from the turbines on a combined basis is less than 10 tpy. With this in mind, the Division affirms its decision that the turbines in question are not a potential major source of formaldehyde emissions.

The Division has required testing of formaldehyde emissions in various PSD permits for similar/identical equipment and does not believe that this Title V permit should be revised to require testing of formaldehyde emissions from the turbines in question. The Division will not revise the permit based on this comment.

8. MONITORING AND REPORTING REQUIREMENTS WERE ALTERED FROM THE SIP PERMITS

Comment: In Monroe Power Plant's SIP Air Quality Permit No. 4911-297-0040-E-04-0 issued September 30, 1999, see Exhibit 1, Condition 2.4b limits the opacity of turbine emissions to 20 percent. However, Condition 3.4.1 of the Title V Draft Permit only limits the opacity of these emissions to 40 percent. EPD should keep requirements the same for the Title V permits.

Similarly, the quarterly reports outline in Condition 8.4 of the SIP Air Quality Permit require reporting of the total monthly fuel usage. The quarterly reports outlined in Condition 6.2.12 of the Title V permit do not contain this requirement. This requirement should be added to the Title V permit.

Response: The Division has removed Condition 3.4.1 and added new condition 3.2.7 which limits the opacity from each turbine to 20 percent based on this comment.

Condition 8.4 of the SIP Air Quality Permit contained a requirement to report the monthly fuel usage in order to verify compliance with the fuel usage limit in Condition 2.6. The fuel usage limit in Condition 2.6 was not carried over to the Title V permit. Thus there is no need for Monroe Power to report fuel usage. Condition 6.2.12 is not revised based on this comment.

9. THE PERMIT DOES NOT REQUIRE MONITORING FOR CO

Comment: The permit contains an emissions limit of 200 lb/hr of carbon monoxide (CO). However, the permit does not include monitoring and reporting to see that this emission limit is met. The permit should be modified to require a continuous emissions monitoring system (CEMS) for CO. This is especially important because the permit limits CO to 250 tons per year. Therefore, if the facility emits 250 tons and one ounce of CO, it is in violation of this permit as well as New Source Review requirements.

Response: The Division maintains that operational limits in permit condition nos. 3.2.5 and 3.2.6 along with the monitoring required by Condition 5.2.3 provides a reasonable assurance of compliance for Condition 3.2.3 (i.e., CO emissions limit of 200 lb/hr). The permit will not be revised based on this comment.

The Division maintains that permit condition nos. 3.2.1, 3.2.2, 3.2.3, 3.2.5 and 3.2.6 provide for limiting annual CO emissions from the facility below 250 tons per year. Part 5 of the permit provides for monitoring for these conditions in Part 3. The actual NOx emission rates achieved during the performance test are as much as 7 times higher than the CO emissions. With this in mind, the Division maintains that the likelihood of the facility emitting more than 250 tons of CO per year is minimal because the facility will "bump up" against the NOx limit of 250 tons per year before actual CO emissions come close to 250 tons per year. [*Refer to discussion on pages 6-7 of this permit narrative.*] The permit will not be revised based on this comment.

10. THE PERMIT ILLEGALLY EXCUSES VIOLATION DURING STARTUP, SHUTDOWN, MALFUNCTION

Comment: Condition 6.2.11 excuses violations of the emissions limits during periods of startup, shutdown and malfunction. This provision is contrary to the Clean Air Act and EPA guidance. See Michigan Manufacturers Association v. Browner, No. 98-3399 (6th Cir. August 24, 2000) (attached as Exhibit 2). Therefore, EPD needs to remove this provision. Both EPA Region 4 and Sierra Club have informed EPD in other context that this startup/shutdown/malfunction provision is illegal.

Response: Condition 6.2.11 comes from Georgia Rule for Air Quality 391-3-1-.02(2)(a)7. The Division disagrees with the commenter that this condition provides for an automatic exemption. The condition does no such thing. The condition states that the Division may allow excess emissions in certain cases as described therein. The condition goes on to state when excess emissions occurring during startup, shutdown or malfunction are not excused. This condition is

no different than EPA's policy on Excess Emissions During Startup, Shutdown, Maintenance, and Malfunction as discussed by Kathleen M Bennett in her September 28, 1982 Memo. Note that this memo is referenced in the court decision cited by the commenter. The condition is not revised or deleted based on this comment.

11. THE PERMIT DOES NOT ADDRESS ALL EMISSION UNITS

Comment: The permit does not address the fuel heaters, emergency generator and firewater pump. These units should be included in the permit along with emissions limits, monitoring and reporting for these units or EPD should explain how this combustion turbine can operate without this equipment.

Response: The facility does not include a fuel heater, emergency generator or firewater pump. Thus these units do not need to be included in the permit. The permit is not revised based on this comment.

12. THE PERMIT DOES NOT FULLY DESCRIBE THE FACILITY

Comment: Condition 1.3 states that the facility is equipped with water injection to control NO_x. However, this is probably not accurate. The water injection is probably used when the facility is firing oil. There is probably no pollution control equipment when the facility is burning oil. If this is the case, the permit should be corrected to accurately reflect the nature of the facility.

Response: The Division finds that the commenter is in error by saying that "the facility" is equipped with water injection. The facility is not but each combustion turbine is equipped with water injection for control of NO_x emissions. The Division agrees with the commenter that water injection is used when the turbines (not facility) fire fuel oil. The use of water injection is viewed as a passive control measure that acts to prevent pollution from forming. The commenter referred to the need to correct the permit to accurately reflect the nature of the facility. By "permit" the Division is assuming that the commenter is referring to Condition Nos. 1.3 and 3.1. Condition Nos. 1.3 and 3.1 note the existence of water injection. Condition 3.1 identifies the existence of water injection as an air pollution control device. The Division maintains that the language in Condition 1.3 does not contradict Condition 3.1 and that both conditions do not misrepresent the nature of the design or operation of the combustion turbines. With this in mind, the Division will not revise this condition based on this comment.

13. THE NO_x LIMIT IS NOT PRACTICABLY ENFORCEABLE

Comment: The NO_x emission limit in Condition 3.3.1 is not practically enforceable because there is no way to determine Y and F for any particular time. See e.g. Condition 6.2.2. (No determination of nitrogen is required). EPD should simply set the limit at 103 ppmvd@ 15% oxygen.

Response: The Division maintains that Condition 3.3.1 is correct and appropriate as written. The condition will not be revised based on this comment.

MODIFIED PERMIT CONDITIONS
4911-297-0040-V-05-0**Permit Cover Page Changes**

Facility Address: ~~208 Cherry Hill Road~~
213 Cherry Hill Road
Monroe, Georgia 30655 (Walton County)

- 3.3.2 The Permittee shall not burn in any combustion turbine, CT01 and CT02, natural gas which contains sulfur in excess of 0.8 ~~weight percent~~ **percent by weight**. [40 CFR 60.333(b)]
- ~~3.4.1 The Permittee shall not discharge, or cause the discharge, into the atmosphere, from each combustion turbine, CT01 and CT02, emissions the opacity of which is equal to or greater than forty (40) percent. [391-3-1-.02(2)(b)]~~
- 3.2.7 The Permittee shall not discharge, or cause the discharge, into the atmosphere, from each combustion turbine, CT01 and CT02, emissions the opacity of which is equal to or greater than twenty (20) percent. [391-3-1-.03(2)(c)]**
- ~~3.4.2 The Permittee shall not discharge, or cause the discharge, into the atmosphere, from each combustion turbine, CT01 and CT02, emissions of nitrogen oxides in excess of 30 ppm at 15% oxygen, dry basis. This condition becomes effective May 1, 2003 and shall apply during the period May 1 through September 30 of each year. [391-3-1-.02(2)(nnn)1.(i)]~~
- 3.4.1 The Permittee shall not discharge, or cause the discharge, into the atmosphere, from each combustion turbine, CT01 and CT02, emissions of nitrogen oxides in excess of 30 ppm at 15% oxygen, dry basis. This condition becomes effective May 1, 2003 and shall apply during the period May 1 through September 30 of each year. [391-3-1-.02(2)(nnn)1.(i)]**
- 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 and 3.4 which pertain to the emission units listed in Section 3.1 are as follows:
- f. Method 7E shall be used for the determination of the concentration of oxides of nitrogen from combustion turbines CT01 and CT02 for purposes of verifying compliance with Georgia Rule 391-3-1-.02(2)(nnn). **The sampling time for each run shall be one hour.**

- 5.2.2 The Permittee shall install, calibrate, maintain, and operate monitoring devices for the measurement of the indicated parameters 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.
- c. A **meter monitor** on each combustion turbine to record the cumulation of hours of operation which shows all periods of operation of the combustion turbine. Data shall be recorded monthly. [391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]
- 5.2.6 For each one-hour average nitrogen oxides concentration in excess of 72 ppmvd, corrected to 15 percent oxygen, the Permittee shall correct the concentration to International Standards Organization (ISO) standard ambient conditions using the equation in 40 CFR 60.335(c)(1), the records of ambient conditions required by Condition 5.2.4, and the combustor inlet pressure measure by the device in Condition 5.2.2.d. **This condition is effective 120 days from the date of issuance of this Permit.** [391-3-1-.02(6)(b)1, 40 CFR 70.6(a)(3)(i), and Alternative Testing and Monitoring for Combustion Turbines, Approved by U.S. EPA Region 4, May 26, 2000]
- 6.2.5 The Permittee shall use the ~~hours~~ **meter monitoring** required by Condition 5.2.2.c to determine and record the following:
- a. The net operating hours for each combustion turbine, CT01 and CT02, during every calendar month.
- b. The total operating hours for the combustion turbines CT01 and CT02, combined, for the twelve consecutive month period ending with each calendar month. A twelve consecutive month total shall be the total for a month in the reporting period plus the totals for the previous 11 consecutive months.

These records (including calculations) shall be maintained as part of the monthly record suitable for inspection or submittal.

- 7.10.1 ~~The Permittee shall submit a Risk Management Plan (RMP) in accordance with the 40 CFR Part 68, when and if, such requirement becomes applicable. All reports and notifications required by 40 CFR Part 68 must be submitted electronically (e.g. diskette or compact disc) to:~~

**~~Attention: RMP*Submit
RMP Reporting Center
P.O. Box 3346
Merrifield, VA 22116-3346~~**

- 7.10.1 **When and if the requirements of 40 CFR Part 68 become applicable, the Permittee shall comply will all applicable requirements of 40 CFR Part 68, including the following.**
- a. **The Permittee shall submit a Risk Management Plan (RMP) as provided in 40 CFR Part 68.150 through 68.185. The RMP shall include a registration that reflects all covered processes.**
- b. **For processes eligible for Program 1, as provided in 40 CFR 68.10, the Permittee shall comply with 7.10.1.a. and the following additional requirements:**
- i. **Analyze the worst-case release scenario for the process(es), as provided in 40 CFR 68.25; document that the nearest public receptor is beyond the distance to a toxic or flammable**

- endpoint defined in 40 CFR 68.22(a); and submit in the RMP the worst-case release scenario as provided in 40 CFR 68.165.
- ii. Complete the five-year accident history for the process as provided in 40 CFR 68.42 and submit in the RMP as provided in 40 CFR 68.168
 - iii. Ensure that response actions have been coordinated with local emergency planning and response agencies
 - iv. Include a certification in the RMP as specified in specified in 40 CFR 68.12(b)(4)
- c. For processes subject to Program 2, as provided in 40 CFR 68.10, the Permittee shall comply with 7.10.1.a., 7.10.1.b. and the following additional requirements:
- i. Develop and implement a management system as provided in 40 CFR 68.15
 - ii. Conduct a hazard assessment as provided in 40 CFR 68.20 through 68.42
 - iii. Implement the Program 2 prevention steps provided in 40 CFR 68.48 through 68.60 or implement the Program 3 prevention steps provided in 40 CFR 68.65 through 68.87
 - iv. Develop and implement an emergency response program as provided in 40 CFR 68.90 through 68.95
 - v. Submit as part of the RMP the data on prevention program elements for Program 2 processes as provided in 40 CFR 68.170
- d. For processes eligible for Program 3, as provided in 40 CFR 68.10, the Permittee shall comply with 7.10.1.a., 7.10.1.b. and the following additional requirements:
- i. Develop and implement a management system as provided in 40 CFR 68.15
 - ii. Conduct a hazard assessment as provided in 40 CFR 68.20 through 68.42
 - iii. Implement the prevention requirements of 40 CFR 68.65 through 68.87
 - iv. Develop and implement an emergency response program as provided in 40 CFR 68.90 through 68.95
 - v. Submit as part of the RMP the data on prevention program elements for Program 3 as provided in 40 CFR 68.175
- e. All reports and notification required by 40 CFR Part 68 must be submitted electronically (e.g., diskette or compact disc) to:

Attention: RMP*Submit
RMP Reporting Center
P.O. Box 3346
Merrifield, VA 22116-3346

Compliance with all requirements of this condition, including the registration and submission of the RMP, shall be included as part of the compliance.

Draft Permit Review		
Reviewing Program	Comments Received? (y/n)	Comments Taken Into Consideration In Draft Permit? (y/n)
ISMP		
SSCP		

SSPP Unit Manager:

//SSPP Unit Manager//

Date

SSPP Program Manager:

SSPP Program Manager

Date