

# Part 70 Operating Permit Amendment

**Permit Amendment No.:** 4922-051-0003-V-02-2    **Effective Date:**

**Facility Name:**            **Southern LNG Inc. – Elba Island LNG Terminal**  
Elba Island  
Savannah, Georgia 31402 Chatham County

**Mailing Address:**        AmSouth Building, 1900 Fifth Avenue North  
Birmingham, Alabama 35203

**Parent/Holding Company:**        El Paso Corporation

**Facility AIRS Number:**    04-13-051-00003

In accordance with the provisions of the Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq and the Georgia Rules for Air Quality Control, Chapter 391-3-1, adopted pursuant to and in effect under the Act, the Permittee described above is issued a construction permit for:

The construction and operation of six 121.4 MM Btu/hr natural gas fired liquefied natural gas (LNG) vaporizer boilers (ID Nos. V009 – V014), two LNG storage tanks (ID Nos. D-5 and D-6), an 11.74 MM Btu/hr natural gas fired heated vent stack heater (ID No. B002), and associated LNG pumps and piping.

This Permit Amendment is conditioned upon compliance with all provisions of The Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq, the Rules, Chapter 391-3-1, adopted and in effect under that Act, or any other condition of this Permit Amendment and Permit No. 4922-051-0003-V-02-0. Unless modified or revoked, this Permit Amendment expires upon issuance of the next Part 70 Permit for this source.

This Permit Amendment may be subject to revocation, suspension, modification or amendment by the Director for cause including evidence of noncompliance with any of the above; or for any misrepresentation made in Application No. TV-16697 dated April 6, 2006; any other applications upon which this Permit Amendment or Permit No. 4922-051-0003-V-02-0 are based; supporting data entered therein or attached thereto; or any subsequent submittal or supporting data; or for any alterations affecting the emissions from this source.

This Permit Amendment is further subject to and conditioned upon the terms, conditions, limitations, standards, or schedules contained in or specified on the attached **13** pages, which pages are a part of this Permit Amendment, and which hereby become part of Permit No. 4922-051-0003-V-02-0.

---

Director  
Environmental Protection Division

**Table of Contents**

**PART 1.0 FACILITY DESCRIPTION..... 1**  
1.3 Process Description of Modification..... 1

**PART 2.0 REQUIREMENTS PERTAINING TO THE ENTIRE FACILITY ..... 2**  
2.1 Facility Wide Emission Caps and Operating Limits..... 2  
2.2 Facility Wide Federal Rule Standards..... 2  
2.3 Facility Wide SIP Rule Standards..... 2  
2.4 Facility Wide Standards Not Covered by a Federal or SIP Rule and Not Instituted as an Emission  
Cap or Operating Limit ..... 2

**PART 3.0 REQUIREMENTS FOR EMISSION UNITS..... 3**  
3.1.1 Additional Emission Units ..... 3  
3.2 Equipment Emission Caps and Operating Limits ..... 3  
3.3 Equipment Federal Rule Standards ..... 4  
3.4 Equipment SIP Rule Standards ..... 5  
3.5 Equipment Standards Not Covered by a Federal or SIP Rule and Not Instituted as an Emission Cap  
or Operating Limit..... 5

**PART 4.0 REQUIREMENTS FOR TESTING ..... 6**  
4.2 Specific Testing Requirements ..... 6

**PART 5.0 REQUIREMENTS FOR MONITORING (Related to Data Collection) ..... 7**  
5.2 Specific Monitoring Requirements ..... 7

**PART 6.0 OTHER RECORD KEEPING AND REPORTING REQUIREMENTS ..... 9**  
6.1 General Record Keeping and Reporting Requirements ..... 9  
6.2 Specific Record Keeping and Reporting Requirements..... 10

**Attachments ..... 13**

**PART 1.0 FACILITY DESCRIPTION**

**1.3 Process Description of Modification**

Southern LNG Inc. – Elba Island LNG Terminal (hereinafter facility) proposes to expand the terminal (Elba III Terminal Expansion) to meet the increased need for new natural gas delivery infrastructure to serve markets in the United States. The proposed expansion will include the construction of six 121.4 MM Btu/hr natural gas fired liquefied natural gas (LNG) vaporizer boilers with ID Nos. V009 – V014, two LNG storage tanks with ID Nos. D-5 and D-6, an 11.74 MM Btu/hr natural gas fired heated vent stack heater with ID No. B002, and associated LNG pumps and piping. The facility anticipates that the Elba III Terminal Expansion will be placed in service between 2009 and 2012.

The Elba III Terminal Expansion will add approximately 8.4 billion cubic feet natural gas equivalent (Bcfe) of storage capacity to the facility and 900 million cubic feet per day (MMcfd) of send-out capacity. Each of the two new LNG storage tanks will have a storage capacity of approximately 1,250,000 barrels, or 4.2 Bcfe. Each of the six new vaporizer boilers will add 180 MMcfd of send-out capacity to the facility. The facility will maintain one of the six vaporizer boilers as a “hot spare.” The new heated vent stack heater will be used to heat a glycol solution for warming natural gas that is occasionally vented from an LNG storage tank.

**PART 2.0 REQUIREMENTS PERTAINING TO THE ENTIRE FACILITY**

**2.1 Facility Wide Emission Caps and Operating Limits**

None applicable.

**2.2 Facility Wide Federal Rule Standards**

None applicable.

**2.3 Facility Wide SIP Rule Standards**

None applicable.

**2.4 Facility Wide Standards Not Covered by a Federal or SIP Rule and Not Instituted as an Emission Cap or Operating Limit**

None applicable.

## Draft Title V Permit Amendment

### PART 3.0 REQUIREMENTS FOR EMISSION UNITS

Note: Except where an applicable requirement specifically states otherwise, the averaging times of any of the Emissions Limitations or Standards included in this permit are tied to or based on the run time(s) specified for the applicable reference test method(s) or procedures required for demonstrating compliance.

#### 3.1.1 Additional Emission Units

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
V009	LNG Vaporizer No. 9	40 CFR 60 Subpart A 40 CFR 60 Subpart Db 40 CFR 52.21 - BACT 391-3-1-.02(2)(d) 391-3-1-.02(2)(g)	3.2.4, 3.3.1, 3.3.8, 3.3.9, 3.4.5, 4.2.7, 4.2.8, 4.2.9, 5.2.8, 5.2.9.a, 6.2.6, 6.2.7, 6.2.8, 6.2.9.a, 6.2.10, 6.2.11	N/A	N/A
V010	LNG Vaporizer No. 10	40 CFR 60 Subpart A 40 CFR 60 Subpart Db 40 CFR 52.21 - BACT 391-3-1-.02(2)(d) 391-3-1-.02(2)(g)	3.2.4, 3.3.1, 3.3.8, 3.3.9, 3.4.5, 4.2.7, 4.2.8, 4.2.9, 5.2.8, 5.2.9.a, 6.2.6, 6.2.7, 6.2.8, 6.2.9.a, 6.2.10, 6.2.11	N/A	N/A
V011	LNG Vaporizer No. 11	40 CFR 60 Subpart A 40 CFR 60 Subpart Db 40 CFR 52.21 - BACT 391-3-1-.02(2)(d) 391-3-1-.02(2)(g)	3.2.4, 3.3.1, 3.3.8, 3.3.9, 3.4.5, 4.2.7, 4.2.8, 4.2.9, 5.2.8, 5.2.9.a, 6.2.6, 6.2.7, 6.2.8, 6.2.9.a, 6.2.10, 6.2.11	N/A	N/A
V012	LNG Vaporizer No. 12	40 CFR 60 Subpart A 40 CFR 60 Subpart Db 40 CFR 52.21 - BACT 391-3-1-.02(2)(d) 391-3-1-.02(2)(g)	3.2.4, 3.3.1, 3.3.8, 3.3.9, 3.4.5, 4.2.7, 4.2.8, 4.2.9, 5.2.8, 5.2.9.a, 6.2.6, 6.2.7, 6.2.8, 6.2.9.a, 6.2.10, 6.2.11	N/A	N/A
V013	LNG Vaporizer No. 13	40 CFR 60 Subpart A 40 CFR 60 Subpart Db 40 CFR 52.21 - BACT 391-3-1-.02(2)(d) 391-3-1-.02(2)(g)	3.2.4, 3.3.1, 3.3.8, 3.3.9, 3.4.5, 4.2.7, 4.2.8, 4.2.9, 5.2.8, 5.2.9.a, 6.2.6, 6.2.7, 6.2.8, 6.2.9.a, 6.2.10, 6.2.11	N/A	N/A
V014	LNG Vaporizer No. 14	40 CFR 60 Subpart A 40 CFR 60 Subpart Db 40 CFR 52.21 - BACT 391-3-1-.02(2)(d) 391-3-1-.02(2)(g)	3.2.4, 3.3.1, 3.3.8, 3.3.9, 3.4.5, 4.2.7, 4.2.8, 4.2.9, 5.2.8, 5.2.9.a, 6.2.6, 6.2.7, 6.2.8, 6.2.9.a, 6.2.10, 6.2.11	N/A	N/A
B002	Heated Vent Stack Heater No. 2	40 CFR 60 Subpart A 40 CFR 60 Subpart Dc 391-3-1-.02(2)(d) 391-3-1-.02(2)(g)	3.2.4, 3.3.1, 3.3.2, 3.4.5, 5.2.9.b, 6.2.9.b	N/A	N/A

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

### 3.2 Equipment Emission Caps and Operating Limits

3.2.4 The Permittee shall not fire any fuel other than natural gas in the LNG vaporizers with ID Nos. V009 – V014 and Heated Vent Stack Heater No. 2 (ID No. B002).  
[40 CFR 52.21(j) and 391-3-1-.02(2)(g)2. (subsumed)]

**3.3 Equipment Federal Rule Standards**

- 3.3.1 The Permittee shall comply with all applicable provisions of the New Source Performance Standards (NSPS), 40 CFR Part 60, Subpart A – “General Provisions,” for the operation of the LNG vaporizers with ID Nos. V001 – V014 and Heated Vent Stack Heater No. 2 (ID No. B002).  
[40 CFR 60 Subpart A]
  
- 3.3.2 The Permit shall comply with all applicable provisions of the New Source Performance Standards (NSPS), 40 CFR Part 60, Subpart Dc – “Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units,” for the operation of the LNG vaporizers with ID Nos. V001 – V005 and Heated Vent Stack Heater No. 2 (ID No. B002).  
[40 CFR 60 Subpart Dc]
  
- 3.3.8 The Permittee shall comply with all applicable provisions of the New Source Performance Standards (NSPS), 40 CFR Part 60, Subpart Db – “Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units,” for the operation of the LNG vaporizers with ID Nos. V009 – V014, and shall not discharge or cause the discharge, into the atmosphere, from each LNG vaporizer with ID Nos. V009 – V014, any gases which:
  - a. Contain sulfur dioxide (SO<sub>2</sub>) in excess of 0.20 pound per million Btu on a 30-day rolling average.  
[40 CFR 60.42b(e) and (k)]
  
  - b. Contain nitrogen oxides (NO<sub>x</sub>) in excess of 0.20 pound per million Btu on a 30-day rolling average.  
[40 CFR 60.44b(a)(1)(ii) and 40 CFR 60.44b(i)]
  
- 3.3.9 The Permittee shall not discharge, or cause the discharge, into the atmosphere, from each LNG vaporizer with ID Nos. V009 – V014, any gases which:
  - a. Contain nitrogen oxides (NO<sub>x</sub>) in excess of 0.037 pound per million Btu on a 3-hour rolling average.  
[40 CFR 52.21(j)]
  
  - b. Contain carbon monoxide (CO) in excess of 0.030 pound per million Btu on a 3-hour rolling average.  
[40 CFR 52.21(j)]

**3.4 Equipment SIP Rule Standards**

3.4.5 The Permittee shall not discharge, or cause the discharge, into the atmosphere, from the LNG vaporizers with ID Nos. V009 – V014 and Heated Vent Stack Heater No. 2 (ID No. B002), any gases which:

- a. Contain particulate emissions in excess of the rate derived from  $P = 0.5 * ( 10 / R )^{0.5}$  where R equals heat input rate in million BTU per hour and P equals the allowable emission rate in pounds per million BTU.  
[391-3-1-.02(2)(d)2.(ii)]
- b. Exhibit visible emissions, the opacity of which is equal to or greater than twenty (20) percent except for one six minute period per hour of not more than twenty-seven (27) percent opacity.  
[391-3-1-.02(2)(d)3.]

**3.5 Equipment Standards Not Covered by a Federal or SIP Rule and Not Instituted as an Emission Cap or Operating Limit**

None Applicable.

**PART 4.0 REQUIREMENTS FOR TESTING**

**4.2 Specific Testing Requirements**

- 4.2.7 Within 60 days after achieving the maximum production rate at which each LNG vaporizer with ID Nos. V009 – V014 will be operated, but not later than 180 days after the initial startup, the Permittee shall conduct performance tests for the emission of nitrogen oxides on each LNG vaporizer with ID Nos. V009 – V014 to determine initial compliance with the emission limit in Condition 3.3.9.a. The results of the performance test(s) shall be submitted to the Division within 60 days of the completion of testing.  
[391-3-1-.02(3), 391-3-1-.02(6)(b)1.(i), and 40 CFR 52.21]
  
- 4.2.8 Within 60 days after achieving the maximum production rate at which each LNG vaporizer with ID Nos. V009 – V014 will be operated, but not later than 180 days after the initial startup, the Permittee shall conduct performance tests for the emission of carbon monoxide on each LNG vaporizer with ID Nos. V009 – V014 to determine initial compliance with the emission limit in Condition 3.3.9.b. The results of the performance test(s) shall be submitted to the Division within 60 days of the completion of testing.  
[391-3-1-.02(3), 391-3-1-.02(6)(b)1.(i), and 40 CFR 52.21]
  
- 4.2.9 Within 60 days after achieving the maximum production rate at which each LNG vaporizer with ID Nos. V009 – V014 will be operated, but no later than 180 days after startup, the Permittee shall conduct performance tests for nitrogen oxides emissions to determine initial compliance with the emission limit in Condition 3.3.8.b. The first day of the initial performance test period shall be no later than 150 days after vaporizer startup, and for the initial performance test, nitrogen oxides from each LNG vaporizer with ID Nos. V009 – V014 are to be monitored for 30 successive vaporizer operating days using the continuous monitoring system required by Condition 5.2.1.c. The 30-day average emission rate, used to determine compliance with the nitrogen oxides emission limit in Condition 3.3.8.b, is the average of all hourly emissions data recorded by the monitoring system during that 30-day test period (including periods of vaporizer startup, shutdown, and malfunction).

Following the date on which the initial performance test is completed or required to be completed under 40 CFR 60.8, whichever comes first, the Permittee shall, when requested by the Division, determine compliance with the emission limit in Condition 3.3.8.b through the use of a 30-day performance test. During periods when performance tests are not requested, nitrogen oxides emissions data collected using the continuous monitoring system shall be used to calculate a 30-day rolling average emissions rate on a daily basis and used to prepare the report required by Condition 6.1.4. A new 30-day rolling average emission rate is calculated each vaporizer operating day as the average of all of the hourly nitrogen oxides emission data for the preceding 30 vaporizer operating days.  
[391-3-1-.02(3), 391-3-1-.02(6)(b)1.(i), and 40 CFR 60.46b(c) and (e)]

For the purpose of this Permit, the definition of a vaporizer operating day shall be any 24-hour period between 12:00 midnight and the following midnight during which any fuel is combusted at any time in the vaporizer. It is not necessary for the fuel to be combusted continuously for the entire 24-hour period.

**PART 5.0 REQUIREMENTS FOR MONITORING (Related to Data Collection)****5.2 Specific Monitoring Requirements**

- 5.2.8 The Permittee shall install, calibrate, maintain, and operate a system to continuously monitor and record the indicated pollutants on the following equipment. Each system shall meet the applicable performance specification(s) of the Division's monitoring requirements.
- a. Nitrogen oxides (NO<sub>x</sub>) and diluent (O<sub>2</sub> or CO<sub>2</sub>) emissions from each LNG vaporizer with ID Nos. V009 – V014. The output of the Continuous Emission Monitoring System (CEMS) shall be expressed in pounds NO<sub>x</sub> per million BTU heat input. In lieu of a CEMS, the Permittee may use a Predictive Emission Monitoring System (PEMS), as allowed by and in accordance with §60.48b(g)(2) of 40 CFR 60, to monitor the NO<sub>x</sub> emissions.  
[391-3-1-.02(6)(b)1, 40 CFR 52.21, 40 CFR 60.48b(b) and (g)(2), and 40 CFR 70.6(a)(3)(i)]
  - b. Carbon monoxide (CO) and diluent (O<sub>2</sub> or CO<sub>2</sub>) emissions from each LNG vaporizer with ID Nos. V009 – V014. The output of the CEMS shall be expressed in pounds CO per million BTU heat input. In lieu of a CEMS, the Permittee may use a Predictive Emission Monitoring System (PEMS) to monitor the CO emissions.  
[391-3-1-.02(6)(b)1, 40 CFR 52.21, and 40 CFR 70.6(a)(3)(i)]
  - c. If the Permittee uses a CEMS to monitor NO<sub>x</sub> and/or CO emissions, the Permittee shall perform daily calibration drift tests (assessments) and data accuracy assessments in accordance with Procedure 1 (Appendix F) of the Division's *Procedures for Testing and Monitoring Sources of Air Pollutants* and 40 CFR Part 60.  
[391-3-1-.02(6)(b)1, 40 CFR 60.13, Appendix F to 40 CFR 60, and 40 CFR 70.6(a)(3)(i)]
  - d. If the Permittee uses a PEMS to monitor NO<sub>x</sub> and/or CO emissions, between January 16 and March 15 of each year, the Permittee shall conduct a Relative Accuracy Test Audit (RATA) on each PEMS as specified in Performance Specification 2 or 4A, as applicable, contained in the Division's **Procedures for Testing and Monitoring Sources of Air Pollutants**. A procedure subject to review and modification by the Division shall be used to replace emission data during all periods of monitoring system downtime.  
[391-3-1-.02(6)(b)1, 40 CFR 60.13, and 40 CFR 70.6(a)(3)(i)]

## Draft Title V Permit Amendment

5.2.9 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.

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

a. A natural gas consumption meter to continuously measure and record the quantity of natural gas, in cubic feet, burned in each LNG vaporizer with ID Nos. V009 – V014. Data shall be recorded daily.

[40 CFR 60.49b(d)]

b. A natural gas consumption meter to continuously measure and record the quantity of natural gas, in cubic feet, burned in Heated Vent Stack Heater No. 2 (ID No. B002). Data shall be recorded monthly.

[40 CFR 60.48c(g)]

**PART 6.0 OTHER RECORD KEEPING AND REPORTING REQUIREMENTS**

**6.1 General Record Keeping and Reporting Requirements**

6.1.7 For the purpose of reporting excess emissions, exceedances or excursions in the report required in Condition 6.1.4, the following excess emissions, exceedances, and excursions shall be reported:

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

- a. Excess emissions: (means for the purpose of this Condition and Condition 6.1.4, any condition that is detected by monitoring or record keeping which is specifically defined, or stated to be, excess emissions by an applicable requirement)
  - ii. Any 30-day rolling average NO<sub>x</sub> emission rate, measured and recorded in accordance with Condition 5.2.8, that is in excess of the limit in Condition 3.3.8.b for any LNG Vaporizer with ID Nos. V009 – V014.
- b. Exceedances: (means for the purpose of this Condition and Condition 6.1.4, any condition that is detected by monitoring or record keeping that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) do not meet the applicable emission limitation or standard consistent with the averaging period specified for averaging the results of the monitoring)
  - iv. Any 3-hour rolling average NO<sub>x</sub> emission rate, measured and recorded in accordance with Condition 5.2.8, that is in excess of the limit in Condition 3.3.9.a for any LNG Vaporizer with ID Nos. V009 – V014.
  - v. Any 3-hour rolling average CO emission rate, measured and recorded in accordance with Condition 5.2.8, that is in excess of the limit in Condition 3.3.9.b for any LNG Vaporizer with ID Nos. V009 – V014.

**6.2 Specific Record Keeping and Reporting Requirements**

6.2.6 The Permittee shall furnish the Division written notification as follows:

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

- a. The actual date of initial startup, the design heat capacity, and type of fuel used for each LNG vaporizer with ID Nos. V009 – V014 and Heated Vent Stack Heater No. 2 (ID No. B002) within 15 days after such date.  
[40 CFR 60.49b(a)]
- b. Certification that a final inspection has shown that construction has been completed in accordance with the application, plans, specifications, and supporting documents submitted in support of the Permit.
- c. The actual date of commencement of construction for each LNG vaporizer with ID Nos. V009 – V014 and Heated Vent Stack Heater No. 2 (ID No. B002) within 15 days after such date.

For the purposes of this Permit, “startup” shall mean the setting in operation of a source for any purpose. [40 CFR 52.21 and 40 CFR 60.7]

6.2.7 If the Permittee seeks to demonstrate compliance with the NO<sub>x</sub> emission limits in Conditions 3.3.8.b and 3.3.9.a through the use of a PEMS under the provisions of Condition 5.2.8.a, within 360 days after the initial startup of the LNG Vaporizers with ID Nos. V009 – V014, the Permittee shall submit the PEMS plan to the Division for approval.  
[391-3-1-.02(6)(b)1, 40 CFR 52.21 and 40 CFR 60.49b(c), and 40 CFR 70.6(a)(3)(i)]

6.2.8 If the Permittee seeks to demonstrate compliance with the CO emission limits in Condition 3.3.9.b through the use of a PEMS under the provisions of Condition 5.2.8.b, within 360 days after the initial startup of the LNG Vaporizers with ID Nos. V009 – V014, the Permittee shall submit the PEMS plan to the Division for approval.  
[391-3-1-.02(6)(b)1, 40 CFR 52.21, and 40 CFR 70.6(a)(3)(i)]

6.2.9 The Permittee shall use the natural gas consumption meters required by Condition 5.2.9 of the Permit to determine and record the following:

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

- a. For each vaporizer operating day, the Permittee shall record and maintain records of the amounts of natural gas combusted in each LNG vaporizer with ID Nos. V009 – V014. Records shall be kept for five years after the date of record and be available for inspection by or submission to the Division upon request.  
[40 CFR 60.49b(d)]
- b. The Permittee shall record each month and maintain records of the amounts of natural gas combusted in Heated Vent Stack Heater No. 2 (ID No. B002). Records shall be kept for five years after the date of record and be available for inspection by or submission to the Division upon request.  
[40 CFR 60.48c(g)]

## Draft Title V Permit Amendment

- 6.2.10 The Permittee shall record each vaporizer operating day and maintain the following records for each LNG vaporizer with ID Nos. V009 – V014. The Permittee shall submit a report containing the following information for each semiannual period ending June 30 and December 31 of each year. All reports shall be postmarked by the 30th day following the end of each reporting period, July 30 and January 30, respectively.  
[391-3-1-.02(6)(b)1, 40 CFR 60.49b(g) and (i), and 40 CFR 70.6(a)(3)]
- a. Calendar date.
  - b. The average hourly nitrogen oxides emission rate (in pounds per million BTU heat input) measured or predicted.
  - c. The 30-day average nitrogen oxides emission rates (in pounds per million BTU heat input) calculated at the end of each vaporizer operating day from the measured or predicted hourly nitrogen oxides emission rates for the preceding 30 vaporizer operating days.
  - d. The average hourly carbon monoxide emission rate (in pounds per million BTU heat input) measured or predicted.
  - e. Identification of the vaporizer operating days when the calculated 30-day average nitrogen oxides emission rate is in excess of the emission limit specified in Condition 3.3.8.b, specifying the reasons for such excess emissions as well as a description of the corrective actions taken.
  - f. Identification of any operating hour when the calculated 3-hour rolling average nitrogen oxides emission rate is greater than the emission limit specified in Condition 3.3.9.a, specifying the reasons for such exceedances as well as a description of the corrective actions taken.
  - g. Identification of any operating hour when the calculated 3-hour rolling average carbon monoxide emission rate is greater than the emission limit specified in Condition 3.3.9.b, specifying the reasons for such exceedances as well as a description of the corrective actions taken.
  - h. Identification of the vaporizer operating days for which pollutant data have not been obtained, including reasons for not obtaining sufficient data, and a description of corrective actions taken.
  - i. Identification of the times when emission data have been excluded from the calculation of average emission rates and the reasons for excluding the data.
  - j. Identification of the “F” factor used for calculations, method of determination, and type of fuel combusted.
  - k. Identification of the times when the pollutant concentration exceeded the full span of the continuous monitoring system.

## Draft Title V Permit Amendment

1. Description of any modification to the continuous monitoring system that could affect the ability of the continuous monitoring system to comply with Performance Specifications 2 or 3.
- 6.2.11 The Permittee shall submit, with the report required by Condition 6.1.4, a fuel supplier certification or a natural gas tariff for the fuel combusted in the LNG vaporizers with ID Nos. V009 – V014 during the semiannual reporting period.  
[391-3-1-.02(6)(b)1, 40 CFR 60.43b(h)(5), 60.45b(k), 60.46b(i), 60.47b(g), 60.48b(j), and 40 CFR 70.6(a)(3)(i)]

## Draft Title V Permit Amendment

### Attachments

- A. List of Standard Abbreviations and List of Permit Specific Abbreviations
- B. Insignificant Activities Checklist, Insignificant Activities Based on Emission Levels and Generic Emission Groups
- C. List of References



## Draft Title V Permit Amendment

### ATTACHMENT B

**NOTE:** Attachment B contains information regarding insignificant emission units/activities and groups of generic emission units/activities in existence at the facility at the time of Permit issuance. Future modifications or additions of insignificant emission units/activities and equipment that are part of generic emissions groups may not necessarily cause this attachment to be updated.

#### INSIGNIFICANT ACTIVITIES CHECKLIST

Category	Description of Insignificant Activity/Unit	Quantity
<b>Mobile Sources</b>	1. Cleaning and sweeping of streets and paved surfaces	1
<b>Combustion Equipment</b>	1. Fire fighting and similar safety equipment used to train fire fighters or other emergency personnel.	1
	2. Small incinerators that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act and are not considered a "designated facility" as specified in 40 CFR 60.32e of the Federal emissions guidelines for Hospital/Medical/Infectious Waste Incinerators, that are operating as follows:  i) Less than 8 million BTU/hr heat input, firing types 0, 1, 2, and/or 3 waste.  ii) Less than 8 million BTU/hr heat input with no more than 10% pathological (type 4) waste by weight combined with types 0, 1, 2, and/or 3 waste.  iii) Less than 4 million BTU/hr heat input firing type 4 waste. (Refer to 391-3-1-.03(10)(g)2.(ii) for descriptions of waste types)	
	3. Open burning in compliance with Georgia Rule 391-3-1-.02 (5).	1
	4. Stationary engines burning:  i) Natural gas, LPG, gasoline, dual fuel, or diesel fuel which are used exclusively as emergency generators;  ii) Natural gas, LPG, and/or diesel fueled generators used for emergency, peaking, and/or standby power generation, where the combined peaking and standby power generation do not exceed 200 hours per year.  iii) Natural gas, LPG, and/or diesel fuel used for other purposes, provided that the output of each engine does not exceed 400 horsepower and that no individual engine operates for more than 2,000 hours per year.  iv) Gasoline used for other purposes, provided that the output of each engine does not exceed 100 horsepower and that no individual engine operates for more than 500 hours per year.	2
		1
		1
<b>Trade Operations</b>	1. Brazing, soldering, and welding equipment, and cutting torches related to manufacturing and construction activities whose emissions of hazardous air pollutants (HAPs) fall below 1,000 pounds per year.	1
<b>Maintenance, Cleaning, and Housekeeping</b>	1. Blast-cleaning equipment using a suspension of abrasive in water and any exhaust system (or collector) serving them exclusively.	
	2. Portable blast-cleaning equipment.	
	3. Non-Perchloroethylene Dry-cleaning equipment with a capacity of 100 pounds per hour or less of clothes.	
	4. Cold cleaners having an air/vapor interface of not more than 10 square feet and that do not use a halogenated solvent.	
	5. Non-routine clean out of tanks and equipment for the purposes of worker entry or in preparation for maintenance or decommissioning.	
	6. Devices used exclusively for cleaning metal parts or surfaces by burning off residual amounts of paint, varnish, or other foreign material, provided that such devices are equipped with afterburners.	
	7. Cleaning operations: Alkaline phosphate cleaners and associated cleaners and burners.	

## Draft Title V Permit Amendment

### INSIGNIFICANT ACTIVITIES CHECKLIST

Category	Description of Insignificant Activity/Unit	Quantity
<b>Laboratories and Testing</b>	1. Laboratory fume hoods and vents associated with bench-scale laboratory equipment used for physical or chemical analysis.	
	2. Research and development facilities, quality control testing facilities and/or small pilot projects, where combined daily emissions from all operations are not individually major or are support facilities not making significant contributions to the product of a collocated major manufacturing facility.	
<b>Pollution Control</b>	1. Sanitary waste water collection and treatment systems, except incineration equipment or equipment subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act..	
	2. On site soil or groundwater decontamination units that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	
	3. Bioremediation operations units that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	
	4. Landfills that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	
<b>Industrial Operations</b>	1. Concrete block and brick plants, concrete products plants, and ready mix concrete plants producing less than 125,000 tons per year.	
	2. Any of the following processes or process equipment which are electrically heated or which fire natural gas, LPG or distillate fuel oil at a maximum total heat input rate of not more than 5 million BTU's per hour: <ul style="list-style-type: none"> <li>i) Furnaces for heat treating glass or metals, the use of which do not involve molten materials or oil-coated parts.</li> <li>ii) Porcelain enameling furnaces or porcelain enameling drying ovens.</li> <li>iii) Kilns for firing ceramic ware.</li> <li>iv) Crucible furnaces, pot furnaces, or induction melting and holding furnaces with a capacity of 1,000 pounds or less each, in which sweating or distilling is not conducted and in which fluxing is not conducted utilizing free chlorine, chloride or fluoride derivatives, or ammonium compounds.</li> <li>v) Bakery ovens and confection cookers.</li> </ul>	
	3. Carving, cutting, routing, turning, drilling, machining, sawing, surface grinding, sanding, planing, buffing, shot blasting, shot peening, or polishing; ceramics, glass, leather, metals, plastics, rubber, concrete, paper stock or wood, also including roll grinding and ground wood pulping stone sharpening, provided that: <ul style="list-style-type: none"> <li>i) Activity is performed indoors; &amp;</li> <li>ii) No significant fugitive particulate emissions enter the environment; &amp;</li> <li>iii) No visible emissions enter the outdoor atmosphere.</li> </ul>	1
	4. Photographic process equipment by which an image is reproduced upon material sensitized to radiant energy (e.g., blueprint activity, photographic developing and microfiche).	
	5. Grain, food, or mineral extrusion processes	
	6. Equipment used exclusively for sintering of glass or metals, but not including equipment used for sintering metal-bearing ores, metal scale, clay, fly ash, or metal compounds.	
	7. Equipment for the mining and screening of uncrushed native sand and gravel.	
	8. Ozonization process or process equipment.	
	9. Electrostatic powder coating booths with an appropriately designed and operated particulate control system.	
	10. Activities involving the application of hot melt adhesives where VOC emissions are less than 5 tons per year and HAP emissions are less than 1,000 pounds per year.	
	11. Equipment used exclusively for the mixing and blending water-based adhesives and coatings at ambient temperatures.	
	12. Equipment used for compression, molding and injection of plastics where VOC emissions are less than 5 tons per year and HAP emissions are less than 1,000 pounds per year.	
	13. Ultraviolet curing processes where VOC emissions are less than 5 tons per year and HAP emissions are less than 1,000 pounds per year.	

**Draft Title V Permit Amendment**

**INSIGNIFICANT ACTIVITIES CHECKLIST**

<b>Category</b>	<b>Description of Insignificant Activity/Unit</b>	<b>Quantity</b>
<b>Storage Tanks and Equipment</b>	1. All petroleum liquid storage tanks storing a liquid with a true vapor pressure of equal to or less than 0.50 psia as stored.	
	2. All petroleum liquid storage tanks with a capacity of less than 40,000 gallons storing a liquid with a true vapor pressure of equal to or less than 2.0 psia as stored that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	
	3. All petroleum liquid storage tanks with a capacity of less than 10,000 gallons storing a petroleum liquid.	3
	4. All pressurized vessels designed to operate in excess of 30 psig storing petroleum fuels that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	
	5. Gasoline storage and handling equipment at loading facilities handling less than 20,000 gallons per day or at vehicle dispensing facilities that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	
	6. Portable drums, barrels, and totes provided that the volume of each container does not exceed 550 gallons.	50
	7. All chemical storage tanks used to store a chemical with a true vapor pressure of less than or equal to 10 millimeters of mercury (0.19 psia).	

**INSIGNIFICANT ACTIVITIES BASED ON EMISSION LEVELS**

<b>Description of Emission Units / Activities</b>	<b>Quantity</b>
Ship Unloading Operations (L001)	1
Lube Oil Storage Tanks (T001, T002, and T003)	3
LNG Storage Tanks (D001, D002, D003, TNK4, D-5, and D-6)	6

**Draft Title V Permit Amendment**

**ATTACHMENT B (continued)**

**GENERIC EMISSION GROUPS**

Emission units/activities appearing in the following table are subject only to one or more of Georgia Rules 391-3-1-.02 (2) (b), (e) &/or (n). Potential emissions of particulate matter, from these sources based on TSP, are less than 25 tons per year per process line or unit in each group. Any emissions unit subject to a NESHAP, NSPS, or any specific Air Quality Permit Condition(s) are not included in this table.

Description of Emissions Units / Activities	Number of Units (if appropriate)	Applicable Rules		
		Opacity Rule (b)	PM from Mfg Process Rule (e)	Fugitive Dust Rule (n)

The following table includes groups of fuel burning equipment subject only to Georgia Rules 391-3-1-.02 (2) (b) & (d). Any emissions unit subject to a NESHAP, NSPS, or any specific Air Quality Permit Condition(s) are not included in this table.

Description of Fuel Burning Equipment	Number of Units
Fuel burning equipment with a rated heat input capacity of less than 10 million BTU/hr burning only natural gas and/or LPG.	2
Fuel burning equipment with a rated heat input capacity of less than 5 million BTU/hr, burning only distillate fuel oil, natural gas and/or LPG.	
Any fuel burning equipment with a rated heat input capacity of 1 million BTU/hr or less.	

**ATTACHMENT C**

**LIST OF REFERENCES**

1. The Georgia Rules for Air Quality Control Chapter 391-3-1. All Rules cited herein which begin with 391-3-1 are State Air Quality Rules.
2. Title 40 of the Code of Federal Regulations; specifically 40 CFR Parts 50, 51, 52, 60, 61, 63, 64, 68, 70, 72, 73, 75, 76 and 82. All rules cited with these parts are Federal Air Quality Rules.
3. *Georgia Department of Natural Resources, Environmental Protection Division, Air Protection Branch, Procedures for Testing and Monitoring Sources of Air Pollutants.*
4. *Georgia Department of Natural Resources, Environmental Protection Division, Air Protection Branch, Procedures for Calculating Air Permit Fees.*
5. Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, Volume I: Stationary Point and Area Sources. This information may be obtained from EPA's TTN web site at [www.epa.gov/ttn/chief/ap42.html](http://www.epa.gov/ttn/chief/ap42.html).
6. The latest properly functioning version of EPA's **TANKS** emission estimation software. The software may be obtained from EPA's TTN web site at [www.epa.gov/ttn/chief/tanks.html](http://www.epa.gov/ttn/chief/tanks.html).
7. The Clean Air Act (42 U.S.C. 7401 et seq).
8. White Paper for Streamlined Development of Part 70 Permit Applications, July 10, 1995 (White Paper #1).
9. White Paper Number 2 for Improved Implementation of the Part 70 Operating Permits Program, March 5, 1996 (White Paper #2).