

Air Permit Review

Permit Issue Date: **date, 2011**

Region: Winston-Salem Regional Office
County: Davidson
NC Facility ID: 2900300
Inspector's Name: Stephen Moser
Date of Last Inspection: 06/20/2011
Compliance Code: 3 / Compliance - inspection

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|--|--|--|---|--|--|
| Facility Data | | | Permit Applicability (this application only) | | |
| <p>Applicant (Facility's Name): Transcontinental Gas Pipeline Company, LLC - Station 155</p> <p>Facility Address: Transcontinental Gas Pipeline Company, LLC - Station 155 650 Becky Hill Road Lexington, NC 27295</p> <p>SIC: 4922 / Natural Gas Transmission NAICS: 48621 / Pipeline Transportation of Natural Gas</p> <p>Facility Classification: Before: Title V After: Title V Fee Classification: Before: Title V After: Title V</p> | | | <p>SIP: NSPS: NESHAP: PSD: PSD Avoidance: NC Toxics: 112(r): Other:</p> | | |
| Contact Data | | | Application Data | | |
| Facility Contact | Authorized Contact | Technical Contact | <p>Application Number: 2900300.11A Date Received: 09/02/2011 Application Type: Renewal Application Schedule: TV-Renewal</p> <p style="text-align: center;">Existing Permit Data</p> <p>Existing Permit Number: 09088/T08 Existing Permit Issue Date: 02/21/2011 Existing Permit Expiration Date: 07/31/2012</p> | | |
| James Raschke District Manager (336) 787-5582 650 Becky Hill Road Lexington, NC 27295 | Mark Bisett Manager, Environmental Compliance (713) 215-2781 PO Box 1396 Houston, TX 77251+1396 | Cecilia Chapa Engineer II (713) 215-2964 PO Box 1396 Houston, TX 77251+1396 | | | |
| <p>Review Engineer: Mark Cuilla</p> <p>Review Engineer's Signature: Date: date, 2011</p> | | | <p style="text-align: center;">Comments / Recommendations:</p> <p>Issue 09088/T09 Permit Issue Date: date, 2011 Permit Expiration Date: date, 2016</p> | | |

I. Purpose of Application

This permitting action is a renewal of an existing Title V permit pursuant to 2Q .0513. The existing Title V permit (**09088T08**) was issued on **February 21, 2011**, with an expiration date of **July 31, 2012**. The renewal application was received on **September 2, 2011**, or at least nine months prior to the expiration date. Therefore, the existing permit shall not expire until the renewal permit has been issued or denied. All terms and conditions of the existing permit shall remain in effect until the renewal permit has been issued or denied.

II. Facility Description

The facility is a natural gas compressor station that moves close to two billion cubic feet of natural gas per day. Current permitted equipment includes seven natural gas-fired lean burn internal combustion engines, one natural gas-fired rich burn internal combustion engine, and one natural gas-fired boiler as well as additional supporting equipment.

III. History/Background/Application Chronology

August 27, 2007 – Permit **09088T05** issued as a Title V renewal.

April 10, 2008 – Permit **09088T06** issued as a minor modification to add the blowdown operations (**ID No. ES-BDO**) to the permitted equipment list from the list of insignificant activities per the Permittee request.

March 26, 2009 – Permit **09088T07** issued for a name change of the facility.

February 21, 2011 – Permit **09088T08** issued to incorporate the 112j Part II Case-by-Case MACT requirements for the one permitted boiler (**ID No. ES-BLR1**) into the permit.

June 20, 2011 – Stephen Moser of the WSRO completed the annual facility inspection.

September 2, 2011 – Permit application **2900300.11A** received as Title V renewal application. Application was deemed complete for processing.

September 26, 2011 – Received WSRO “Comments and Recommendations on Air Permit Application” document from Stephen Moser. He noted that the off-season NO_x limit for engine four looks suspicious. The limit of 26.29 pounds per hour versus the 30.1 pound per hour ozone limit bucks the trend of all other engines. In all other cases, off-ozone limits are greater than the ozone limits. Engine four is opposite. Please investigate when renewing the permit. *The 30.1 pound per hour limit was established as part of a permit modification to add alternative monitoring for 15A NCAC 2D .1409 that is required to ensure compliance with the allowable NO_x limits. The Permittee proposed an alternative plan rather than installing and operating continuous emissions monitoring (CEMs). The submitted plan was reviewed by DAQ and requires that the Permittee establish hourly NO_x limits for ozone season based on the season cap and the operating hours for each unit. The limits that were approved were added to the permit in Section 2.2. The 15A NCAC 2D .0501 NO_x limit for NAAQS compliance remained unchanged. There appears to be no error in the limits as they currently exist in the permit. Therefore, no change is necessary as part of this permit renewal.*

October 10, 2011 – Draft permit sent to regional office and Permittee for review prior to public notice and EPA review. Steve Moser of the WSRO provided the following comments on the draft permit and review (*RCO response in italics*):

1. Review and draft look fine to me. One typo though. For source ES-A/C1 (rich burn air compressor engine with compliance date of **October 19, 2013**), I believe the test date should be **April 17, 2014**. **April 17, 2004** is in both the review and the permit now. *Agree, fix has been made in both the draft permit and review.*

Ms. Cecilia Chapa of Transco provided the following comments on the draft permit and review (*RCO response in italics*):

1. The deadline for initial compliance testing on A/C1 seems to be in error. It indicates **April 17, 2004**. *Agree, see WSRO comments above and corresponding fix.*

2. Transco would like the opportunity to request removal of testing requirements under condition 2.1 A.3.d. It was brought up that the condition may have originally been incorporated by accident. *Agree; testing has been removed as requested. While it could not be determined if the condition was added in error, a review of the permits for Transco’s sister facilities (ID Nos. 4900225 and 7900131) reveal that no 2D .0501 condition includes the testing requirements as this permit does. This supports the conclusion that the testing language may have been added in error in past permit modifications. The draft permit has been modified as requested by replacing the testing condition with the shell testing language. Through this, DAQ retains the ability to require testing of the subject units as it deems necessary. Steve Moser of the WSRO concurs with this modification.*

date, 2011 – Draft permit sent to 30-day public notice and 45-day EPA review.

IV. Permit Modifications/Changes and ESM Discussion

The following table describes the modifications to the current permit as part of the renewal process.

| Page(s) | Section | Description of Change(s) |
|------------|--------------------------|--|
| Attachment | Insignificant activities | -amended permit revision number |
| Cover | - | -amended permit revision numbers and all dates |
| All | Header | -amended permit revision numbers |
| 3 | Equipment Table | -added MACT (40 CFR 63, Subpart ZZZZ) designation -corrected 112j Case-by-Case designation |
| 5 | 2.1 A.3.d | -replaced testing requirement with shell testing language per Permittee request and WSRO concurrence |
| 7 | 2.1 C (table) | -added MACT (40 CFR 63, Subpart ZZZZ) designation |
| 8-13 | 2.1 C.4 | -added MACT (40 CFR 63, Subpart ZZZZ) permit condition |

V. Regulatory Review

The facility is currently subject to the following regulations:

- 15A NCAC 2D .0501, Compliance with Emission Control Standards
- 15A NCAC 2D .0516, Sulfur Dioxide Emissions from Combustion Sources
- 15A NCAC 2D .0521, Control of Visible Emissions
- 15A NCAC 2D .1109, Case-by-Case MACT
- 15A NCAC 2D .1111, Maximum Achievable Control Technology (40 CFR63, Subpart ZZZZ)
- 15A NCAC 2D .1409, Seasonal Emission Rate for Large Combustion Sources

A regulatory review for these existing requirements will not be included in this document.

VI. NSPS, NESHAPS/MACT, PSD, 112(r), CAM

NSPS – The Permittee is not currently subject to any New Source Performance Standards. This permit renewal does not affect this status.

NESHAPS/MACT/112j –During the last permit renewal cycle, all existing units were analyzed for applicability to the National Emission Standards for Hazardous Air Pollutants for Stationary Internal Combustion Engines (40 CFR 63, Subpart ZZZZ). Mainline units one through six (**ID Nos. ES-M/L1 through ES-M/L6**) and auxiliary unit (**ID No. ES-AUX1**) were each determined to have no applicable requirements per 40 CFR 63.6590(b)(3). This permit renewal does not affect this status.

The Permittee also operates one additional auxiliary unit (**ID No. ES-A/C1**). At the time of the last permit renewal, this unit was determined to not have any requirements under this Subpart because of a size exemption found in 40 CFR 63.6590(b)(3). However, EPA promulgated modifications to this Subpart on **January 18, 2008, March 3, 2010, and August 20, 2010**. As part of these modifications, this unit lost its exemption from the Subpart. As an existing non-emergency spark ignition 4 stroke rich burn engine (4SRB) with a brake horsepower rating between 100 and 500 horsepower located at a major source of HAPs, this unit is now subject to the following requirements (Source - EPA Summary Table October 2010):

| Requirements | Existing Non-Emergency Spark Ignition 4SRB (100≤Hp≤500) |
|---|---|
| Compliance Date | October 19, 2013 |
| Emission Limitations | 63.6602 Table 2c |
| Operating Limitations | NA |
| Fuel Requirements | NA |
| Performance Tests | 63.6612 63.6620 Table 4 Table 5 |
| Monitoring, Installation, Collection, Operation and Maintenance Requirements | 63.6625(h) |
| Initial Compliance | 63.6630 Table 5 |
| Continuous Compliance | 63.6605 63.6640 |
| Notification Requirements | 63.6645 |
| Recordkeeping Requirements | 63.6655 (except (c), (e), and (f)) |
| Reporting Requirements | 63.6650 (except (g)) |

The following permit condition has been added as Section 2.1 C.4 for this source:

4. 15A NCAC 2D .1111: MAXIMUM ACHIEVABLE CONTROL TECHNOLOGY

- a. For this source (**ID No. ES-A/C1**), the Permittee shall demonstrate compliance by **October 19, 2013** with all applicable requirement of 15A NCAC 2D .1111 “Maximum Achievable Control Technology” and 40 CFR 63 Subpart ZZZZ “National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE).”

Emission Limitations [40 CFR 63.6595, 63.6602, and Table 2c]

- b *The Permittee must limit the concentration of formaldehyde in the exhaust to 10.3 ppmvd or less at 15 percent oxygen. Compliance with the numerical emission limitations established in this subpart is based on the results of testing the average of three 1-hour runs using the testing requirements and procedures in 40 CFR 63.6620 and Table 4 to this Subpart.*

Testing and Initial Compliance Requirements [40 CFR 63.6612, 63.6620, and Table 4]

- c. *The Permittee shall conduct the following initial performance test or other initial compliance demonstration by **April 17, 2014** according to the provisions in §63.7(a)(2).*
 - i. *The Permittee complying with the requirement to limit the concentration of formaldehyde in the exhaust must:*
 - A. *Select the sampling port location and the number of traverse points using Method 1 or 1A of 40 CFR part 60, appendix A §63.7(d)(1)(i). If using a control device, the sampling site must be located at the outlet of the control device;*
 - B. *Determine the O₂ concentration of the stationary RICE exhaust at the sampling port location using Method 3 or 3A or 3B of 40 CFR part 60, appendix A, or ASTM Method D6522–00 (2005). Measurements to determine O₂ concentration must be made at the same time and location as the measurements for formaldehyde concentration;*
 - C. *Measure moisture content of the stationary RICE exhaust at the sampling port location using Method 4 of 40 CFR part 60, appendix A, or Test Method 320 of 40 CFR part 63, appendix A, or ASTM D 6348–03. Measurements to determine moisture content must be made at the same time and location as the measurements for formaldehyde concentration; and*
 - D. *Measure formaldehyde at the exhaust of the stationary RICE using Method 320 or 323 of 40 CFR part 63, appendix A; or ASTM D6348–03, provided in ASTM D6348–03 Annex A5 (Analyte Spiking Technique), the percent R must be greater than or equal to 70 and less than or equal to 130. Formaldehyde concentration must be at 15 percent O₂, dry basis. Results of this test consist of the average of the three 1-hour or longer runs.*
 - d. *The Permittee is not required to conduct an initial performance test on a unit for which a performance test meeting the following conditions has been previously conducted:*
 - i. *The test must have been conducted using the same methods specified in this subpart, and these methods must have been followed correctly.*
 - ii. *The test must not be older than 2 years.*
 - iii. *The test must be reviewed and accepted by the Administrator, EPA Region IV.*
 - iv. *Either no process or equipment changes must have been made since the test was performed, or the Permittee must be able to demonstrate that the results of the performance test, with or without adjustments, reliably demonstrate compliance despite process or equipment changes.*
 - e. *For each non-operational stationary RICE that is subject to performance testing, the Permittee does not need to start up the engine solely to conduct the performance test. The Permittee can conduct the performance test when the engine is started up again.*
 - f. *The Permittee must conduct three separate test runs for each performance test required in this section, as specified in §63.7(e)(3). Each test run must last at least 1 hour.*
 - g. *The Permittee shall:*
 - i. *Use Equation 1 of this section to determine compliance with the percent reduction requirement:*

$$\frac{C_i - C_o}{C_i} \times 100 = R \quad (\text{Eq. 1})$$

Where:

C_i = concentration of formaldehyde at the control device inlet,
 C_o = concentration of formaldehyde at the control device outlet, and
 R = percent reduction of formaldehyde emissions.

ii. Normalize the formaldehyde concentrations at the inlet and outlet of the control device to a dry basis and to 15 percent oxygen, or an equivalent percent carbon dioxide (CO_2). If pollutant concentrations are to be corrected to 15 percent oxygen and CO_2 concentration is measured in lieu of oxygen concentration measurement, a CO_2 correction factor is needed. Calculate the CO_2 correction factor as follows:

A. Calculate the fuel-specific F_o value for the fuel burned during the test using values obtained from Method 19, section 5.2, and the following equation:

$$F_o = \frac{0.209 F_d}{F_c} \quad (\text{Eq. 2})$$

Where:

F_o = Fuel factor based on the ratio of oxygen volume to the ultimate CO_2 volume produced by the fuel at zero percent excess air.

0.209 = Fraction of air that is oxygen, percent/100.

F_d = Ratio of the volume of dry effluent gas to the gross calorific value of the fuel from Method 19, dsm^3/J ($\text{dscf}/10^6 \text{ Btu}$).

F_c = Ratio of the volume of CO_2 produced to the gross calorific value of the fuel from Method 19, dsm^3/J ($\text{dscf}/10^6 \text{ Btu}$).

B. Calculate the CO_2 correction factor for correcting measurement data to 15 percent oxygen, as follows:

$$X_{\text{co}_2} = \frac{5.9}{F_o} \quad (\text{Eq. 3})$$

Where:

X_{co_2} = CO_2 correction factor, percent.

5.9 = 20.9 percent O_2 - 15 percent O_2 , the defined O_2 correction value, percent.

C. Calculate the NO_x and SO_2 gas concentrations adjusted to 15 percent O_2 using CO_2 as follows:

$$C_{\text{adj}} = C_d \frac{X_{\text{co}_2}}{\% \text{CO}_2} \quad (\text{Eq. 4})$$

Where:

$\% \text{CO}_2$ = Measured CO_2 concentration measured, dry basis, percent.

h. If the Permittee complies with the emission limitation to limit the concentration of formaldehyde in the stationary RICE exhaust and is not using an oxidation catalyst or NSCR, he must petition the Administrator, EPA Region IV for operating limitations to be established during the initial performance test and continuously monitored thereafter; or for approval of no operating limitations. The petition must include the following information.

- i. Identification of the specific parameters proposed to use as operating limitations;
- ii. A discussion of the relationship between these parameters and HAP emissions, identifying how HAP emissions change with changes in these parameters, and how limitations on these parameters will serve to limit HAP emissions;
- iii. A discussion of how you will establish the upper and/or lower values for these parameters which will establish the limits on these parameters in the operating limitations;
- iv. A discussion identifying the methods you will use to measure and the instruments you will use to monitor these parameters, as well as the relative accuracy and precision of these methods and instruments; and
- v. A discussion identifying the frequency and methods for recalibrating the instruments you will use for monitoring these parameters.

The Permittee must not conduct the initial performance test until after the petition has been approved by the Administrator.

- i. *If the Permittee petitions the Administrator for approval of no operating limitations, the petition must include the following information.*
 - i. *Identification of the parameters associated with operation of the stationary RICE and any emission control device which could change intentionally (e.g., operator adjustment, automatic controller adjustment, etc.) or unintentionally (e.g., wear and tear, error, etc.) on a routine basis or over time;*
 - ii. *A discussion of the relationship, if any, between changes in the parameters and changes in HAP emissions;*
 - iii. *For the parameters which could change in such a way as to increase HAP emissions, a discussion of whether establishing limitations on the parameters would serve to limit HAP emissions;*
 - iv. *For the parameters which could change in such a way as to increase HAP emissions, a discussion of how you could establish upper and/or lower values for the parameters which would establish limits on the parameters in operating limitations;*
 - v. *For the parameters, a discussion identifying the methods you could use to measure them and the instruments you could use to monitor them, as well as the relative accuracy and precision of the methods and instruments;*
 - vi. *For the parameters, a discussion identifying the frequency and methods for recalibrating the instruments you could use to monitor them; and*
 - vii. *A discussion of why, from your point of view, it is infeasible or unreasonable to adopt the parameters as operating limitations.*
- j. *The engine percent load during a performance test must be determined by documenting the calculations, assumptions, and measurement devices used to measure or estimate the percent load in a specific application. A written report of the average percent load determination must be included in the notification of compliance status. The following information must be included in the written report:*
 - i. *the engine model number,*
 - ii. *the engine manufacturer,*
 - iii. *the year of purchase,*
 - iv. *the manufacturer's site-rated brake horsepower,*
 - v. *the ambient temperature, pressure, and humidity during the performance test, and*
 - vi. *all assumptions that were made to estimate or calculate percent load during the performance test must be clearly explained.*

If measurement devices such as flow meters, kilowatt meters, beta analyzers, stain gauges, etc. are used, the model number of the measurement device, and an estimate of its accurate in percentage of true value must be provided.

Monitoring, installation, collection, operation, and maintenance requirements [40 CFR 63.6625]

- k. *The Permittee must minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the emission standards applicable to all times other than startup apply.*

Initial compliance [40 CFR 63.6630 and Table 5]

- l. *The Permittee has demonstrated initial compliance with each emission limitation that applies to each source complying with the requirement to limit the concentration of formaldehyde in the exhaust if the average formaldehyde concentration, as applicable, corrected to 15 percent oxygen, dry basis, from the three test runs is less than or equal to the formaldehyde emission limitation, as applicable.*
- m. *During the initial performance test, the Permittee must establish each operating limitation that applies to you.*
- n. *The Permittee must submit the Notification of Compliance Status containing the results of the initial compliance demonstration according to the requirements in 40 CFR 63.6645.*

Continuous Compliance Requirements [40 CFR 63.6640]

- o. *The Permittee must report each instance in which each emission limitation that apply to you was not met. These instances are deviations from the emission limitations in this subpart. These deviations must be reported according to the requirements in 40 CFR 63.6650. With each catalyst change, the values of the operating parameters measured during the initial performance test must be reestablished and a new performance test to demonstrate that the required emission limitations applicable to the source must be conducted.*

Recordkeeping Requirements [40 CFR 63.6655]

- p. *The Permittee must keep the following records:*
 - i. *A copy of each notification and report that you submitted to comply with this subpart, including all documentation supporting any Initial Notification or Notification of Compliance Status that you submitted, according to the requirement in 40 CFR 63.10(b)(2)(xiv).*
 - ii. *Records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment.*
 - iii. *Records of performance tests and performance evaluations as required in 40 CFR 63.10(b)(2)(viii).*
 - iv. *Records of all required maintenance performed on the air pollution control and monitoring equipment.*
 - v. *Records of actions taken during periods of malfunction to minimize emissions in accordance with 40 CFR 63.6605(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.*
 - vi. *For each CEMS or CPMS, you must keep the following records*
 - A. *Records described in 40 CFR 63.10(b)(2)(vi) through (xi).*
 - B. *Previous (i.e., superseded) versions of the performance evaluation plan as required in 40 CFR 63.8(d)(3).*
 - C. *Requests for alternatives to the relative accuracy test for CEMS or CPMS as required in 40 CFR 63.8(f)(6)(i), if applicable.*

Notifications and Reporting Requirements [40 CFR 63.6645 and 63.6650]

- q. The Permittee must submit all of the notifications in 40 CFR 63.7(b) and (c), 63.8(e), (f)(4) and (f)(6), 63.9(b) through (e), and (g) and (h) that apply to you by the dates specified.*
- r. The Permittee must submit a Notification of Intent to conduct a performance test at least 60 days before the performance test is scheduled to begin as required in 40 CFR 63.7(b)(1).*
- s. The Permittee must submit a Notification of Compliance Status according to 40 CFR 63.9(h)(2)(ii).
 - i. For each initial compliance demonstration required in Table 5 to this subpart that does not include a performance test, the Notification of Compliance Status must be submitted before the close of business on the 30th day following the completion of the initial compliance demonstration.*
 - ii. For each initial compliance demonstration required in Table 5 to this subpart that includes a performance test conducted according to the requirements in Table 3 to this subpart, the Notification of Compliance Status, including the performance test results, must be submitted before the close of business on the 60th day following the completion of the performance test according to 40 CFR 63.10(d)(2).**
- t. The Permittee must submit a semiannual compliance report containing the following:
 - i. If there are no deviations from any emission limitations that apply to you, a statement that there were no deviations from the emission limitations during the reporting period. If there were no periods during which the CMS, including CEMS and CPMS, was out-of-control, as specified in 40 CFR 63.8(c)(7), a statement that there were not periods during which the CMS was out-of-control during the reporting period; or*
 - ii. If you had a deviation from any emission limitation during the reporting period, the information in 40 CFR 63.6650(d). If there were periods during which the CMS, including CEMS and CPMS, was out-of-control, as specified in 40 CFR 63.8(c)(7), the information in 40 CFR 63.6650(e); or*
 - iii. If you had a malfunction during the reporting period, the information in 40 CFR 63.6650(c)(4).**
- u. The Permittee must submit each semiannual Compliance report postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. The Compliance report must contain the following information:
 - i. Company name and address.*
 - ii. Statement by a responsible official, with that official's name, title, and signature, certifying the accuracy of the content of the report.*
 - iii. Date of report and beginning and ending dates of the reporting period.*
 - iv. the number, duration, and a brief description for each type of malfunction, if any, which occurred during the reporting period and which caused or may have caused any applicable emission limitation to be exceeded. The report must also include a description of actions taken during a malfunction to minimize emissions in accordance with 40 CFR 63.6605(b), including actions taken to correct a malfunction.*
 - v. If there are no deviations from any emission limitation that apply to you, a statement that there were no deviations from the emission limitation during the reporting period.*
 - vi. If there were no periods during which the continuous monitoring system (CMS), including CEMS and CPMS, was out-of-control, as specified in 40 CFR 63.8(c)(7), a statement that there were no periods during which the CMS was out-of-control during the reporting period.**

- v. *For each deviation from an emission limitation that occurs for a source where you are not using a CMS to comply with the emission limitations in this subpart, the Compliance report must contain the information in paragraphs (u)(1) through (4) above and the following information.*
 - i. *The total operating time of the source at which the deviation occurred during the reporting period.*
 - ii. *Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken.*
- w. *For each deviation from an emission limitation occurring for a stationary RICE where you are using a CMS to comply with the emission limitations in this subpart, you must include information in paragraphs (u)(1) through (4) above and the following information.*
 - i. *The date and time that each malfunction started and stopped.*
 - ii. *The date, time, and duration that each CMS was inoperative, except for zero (low-level) and high-level checks.*
 - iii. *The date, time, and duration that each CMS was out-of-control, including the information in 40 CFR 63.8(c)(8).*
 - iv. *The date and time that each deviation started and stopped, and whether each deviation occurred during a period of malfunction or during another period.*
 - v. *A summary of the total duration of the deviation during the reporting period, and the total duration as a percent of the total source operating time during that reporting period.*
 - vi. *A breakdown of the total duration of the deviations during the reporting period into those that are due to control equipment problems, process problems, other known causes, and other unknown causes.*
 - vii. *A summary of the total duration of CMS downtime during the reporting period, and the total duration of CMS downtime as a percent of the total operating time of the stationary RICE at which the CMS downtime occurred during that reporting period.*
 - viii. *An identification of each parameter and pollutant (formaldehyde) that was monitored at the source.*
 - ix. *A brief description of the source.*
 - x. *A brief description of the CMS.*
 - xi. *The date of the latest CMS certification or audit.*
 - xii. *A description of any changes in CMS, processes, or controls since the last reporting period.*
- x. *Each affected source that has obtained a title V operating permit pursuant to 40 CFR part 70 or 71 must report all deviations as defined in this subpart in the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A). If an affected source submits a Compliance report pursuant to Table 7 of this subpart along with, or as part of, the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), and the Compliance report includes all required information concerning deviations from any emission or operating limitation in this subpart, submission of the Compliance report shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a Compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permit authority.*

On **February 10, 2011**, the Permittee submitted to DAQ initial notification of applicability for this unit. They state “*Transco has identified the above stationary RICE as subject to emission standards specified in 40 CFR 63, Subpart ZZZZ. An evaluation of potential compliance options for the affected source is currently underway. Compliance options include engine reclassification to emergency status, engine reclassification to limited use status, engine retirement, engine replacement, or engine retrofit. The affected RICE will be in compliance with the applicable requirements by the **October 19, 2013** compliance deadline.*” The permit condition as written above is for the engine as it is currently classified. If the Permittee does decide to modify the engine as suggested, each option would require that a permit modification be submitted prior to the change. The permit condition would need to be modified at that point to make it consistent with the ultimate decision of the Permittee.

PSD – The Permittee is not currently subject to any Prevention of Significant Deterioration requirements. This permit renewal does not affect this status.

112(r) – The Permittee is not subject to Section 112(r) of the Clean Air Act requirements because the facility does not store any of the regulated substances in quantities above the thresholds in the Rule. This permit renewal does not affect this status.

CAM – 40 CFR 64 requires that a continuous assurance monitoring plan be developed for all equipment located at a major facility, that have pre-controlled emissions above the major source threshold, and use a control device to meet an applicable standard. Because no control devices are in use at the facility, CAM is not applicable. This permit renewal does not affect this status.

VII. Facility Wide Air Toxics

The facility is not currently subject to any air toxics standards. This permit action does not affect this status. It should be noted that the requirements for the submittal of a last MACT/air toxics demonstration at the time of compliance with the facility’s last MACT per 15A NCAC 2Q .0705 do not apply at this time because of the exemption of combustion sources per 15A NCAC 2Q .0702.

VIII. Facility Emissions Review

There is no change in emissions for this renewal.

The following table represents the latest years’ emission inventories from the facility:

| Pollutant(s) | 2009 Actual Emissions (tpy) | 2010 Actual Emissions (tpy) |
|------------------|-----------------------------|-----------------------------|
| CO | 86.82 | 196.18 |
| NO _x | 68.47 | 132.02 |
| PM ₁₀ | 4.01 | 7.4 |
| SO ₂ | 0.05 | 0.13 |
| VOC | 36.14 | 69.26 |
| Total HAP/TAP | 20.02 | 41.14 |

IX. Stipulation Review

The facility was last inspected by Stephen Moser of the WSRO on **June 20, 2011**. At that time of the inspection, the facility appeared to be in compliance with the applicable air quality regulations. He noted no necessary permit modifications.

X. Public Notice/EPA and Affected State(s) Review

A notice of the DRAFT Title V Permit shall be made pursuant to 15A NCAC 2Q .0521. The notice will provide for a 30-day comment period, with an opportunity for a public hearing. Copies of the public notice shall be sent to persons on the Title V mailing list and EPA. Pursuant to 15A NCAC 2Q .0522, a copy of each permit application, each proposed permit and each final permit pursuant shall be provided to EPA. Also pursuant to 2Q .0522, a notice of the DRAFT Title V Permit shall be provided to each affected State at or before the time notice provided to the public under 2Q .0521 above. Mecklenburg and Forsyth Counties are affected Local Programs within 50 miles of this facility.

XI. Conclusions, Comments, and Recommendations

A professional engineer's seal was not required for this renewal.

A consistency determination was not required for this renewal.

WSRO recommends issuance of the permit and was presented with a DRAFT permit prior to notice and issuance.

RCO concurs with WSRO's recommendation to issue the renewed air permit.