

PUBLIC NOTICE

East Tennessee Natural Gas, LLC-Ridgetop Compressor Station (Station 3101) has applied to the Tennessee Department of Environment and Conservation, Division of Air Pollution Control for a major source (Title V) operating permit subject to the provisions of Tennessee Air Pollution Control Regulations 1200-03-09-.02(11) (Title V Regulations). A major source operating permit is required by both the Federal Clean Air Act and Tennessee's air pollution control regulations. However, it should be noted that this facility previously received a permit(s) to construct a new facility.

The applicant is **East Tennessee Natural Gas, LLC-Ridgetop Compressor Station (Station 3101)** with a site address of 6859 Hall Road, Greenbrier, TN 37073. They have applied for a major source (Title V) operating permit for their natural gas compressor station operation.

EPA has agreed to treat this draft Part 70 permit as a proposed Part 70 permit and to perform its 45-day review provided by the law concurrently with the public notice period. If any substantive comments are received, EPA's 45-day review period will cease to be performed concurrently with the public notice period. In this case, EPA's 45-day review period will start once the public notice period has been completed and EPA receives notification from the Tennessee Air Pollution Control Division that comments have been received and resolved. The status regarding EPA's 45-day review of these permits and the deadline for submitting a citizen's petition can be found at the following website address:

<https://www.epa.gov/caa-permitting/tennessee-proposed-title-v-permits>”

Copies of the application materials and draft permits are available for public inspection during normal business hours at the following locations:

Nashville Environmental Field Office
711 R.S. Gass Blvd
Nashville, TN 37216

and

Tennessee Department of Environment and Conservation
Division of Air Pollution Control
Davy Crockett Tower, 7th Floor
500 James Robertson Parkway
Nashville, TN 37243

Electronic copies of the draft permits are available by accessing the TDEC internet site located at:

<https://www.tn.gov/environment/ppo/air.html>

Questions concerning the source(s) may be addressed to Mark A. Landry at (615) 571-2817 or by e-mail at Mark.Landry@tn.gov.

Interested parties are invited to review these materials and comment. In addition, a public hearing may be requested at which written or oral presentations may be made. To be considered, written comments or requests for a public hearing must be received no later than 4:30 PM on November 2, 2026. To assure that written comments are received and addressed in a timely manner, written comments must be submitted using one of the following methods:

1. **Mail, private carrier, or hand delivery:** Address written comments to Director, Tennessee Division of Air Pollution Control, Davy Crockett Tower, 500 James Robertson Pky 7th Floor, Nashville, Tennessee 37243.
2. **E-mail:** Submit electronic comments to air.pollution.control@tn.gov.

A final determination will be made after weighing all relevant comments.

Individuals with disabilities who wish to review information maintained at the above-mentioned depositories should contact the Tennessee Department of Environment and Conservation to discuss any auxiliary aids or services needed to facilitate such review. Such contact may be in person, by writing, telephone, or other means, and should be made no less than ten days prior to the end of the public comment period to allow time to provide such aid or services. Contact the Tennessee Department of Environment and Conservation ADA Coordinator, Davy Crockett Tower, 5th Floor, 500 James Robertson Parkway, Nashville, TN 37243, 1-(866)-253-5827. Hearing impaired callers may use the Tennessee Relay Service, 1-(800)-848-0298.

**TENNESSEE AIR POLLUTION CONTROL BOARD
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
NASHVILLE, TENNESSEE 37243-1531**



OPERATING PERMIT (TITLE V) Issued Pursuant to Tennessee Air Quality Act

This permit fulfills the requirements of Title V of the Federal Clean Air Act (42 U.S.C. 7661a-7661e) and the federal regulations promulgated thereunder at 40 CFR Part 70. (FR Vol. 57, No. 140, Tuesday, July 21, 1992 p.32295-32312). This permit is issued in accordance with the provisions of paragraph 1200-03-09-.02(11) of the Tennessee Air Pollution Control Regulations (TAPCR). The permittee has been granted permission to operate an air contaminant source in accordance with emissions limitations and monitoring requirements set forth herein.

Date Issued: PROPOSED-DRAFT

Permit Number:

583429

Date Expires: PROPOSED-DRAFT

Issued To:

East Tennessee Natural Gas, LLC-Ridgetop Compressor Station (Station 3101)

Installation Address:

6859 Hall Road
Greenbrier

Installation Description:

Natural Gas Pipeline Compressor Station:

01: Three Solar® Model 010-01202S0 1,242 bhp at ISO (1,313 bhp @ 0.01 °F)
(14.95 MMBtu/hr @ 59.86 °F) Natural Gas-Fired Combustion Turbines

03: One Ford C50G-6005-A Natural Gas-Fired Standby 4 Stroke Rich Burn
Emergency Generator Engine [0.71 MMBTU/hr, 68 bhp]

NESHAP 40 CFR 63 Subpart ZZZZ

Emission Source Reference No.: **74-0064**

Renewal Application Due Date:

Between PROPOSED-DRAFT and PROPOSED-DRAFT

Primary SIC: 49

Information Relied Upon:

Initial Title V Application dated:

February 12, 2025 (with supplemental information dated January 20, 2026, and April 17, 2025)

(Continued on the next page)

TECHNICAL SECRETARY

No Authority is Granted by this Permit to Operate, Construct, or Maintain any Installation in Violation of any Law, Statute, Code, Ordinance, Rule, or Regulation of the State of Tennessee or any of its Political Subdivisions.

POST AT INSTALLATION ADDRESS

CONTENTS

SECTION A

GENERAL PERMIT CONDITIONS

	Page
A1. Definitions	1
A2. Compliance requirement	1
A3. Need to halt or reduce activity	1
A4. The permit	1
A5. Property rights	1
A6. Submittal of requested information	1
A7. Severability clause	2
A8. Fee payment	2
A9. Permit revision not required	2
A10. Inspection and entry	2
A11. Permit shield	3
A12. Permit renewal and expiration	3
A13. Reopening for cause	3
A14. Permit transference	4
A15. Air pollution alert	4
A16. Construction permit required	4
A17. Notification of changes	4
A18. Schedule of compliance	5
A19. Title VI	5
A20. 112 (r)	5

SECTION B

**GENERAL CONDITIONS for MONITORING,
REPORTING and ENFORCEMENT**

B1. Recordkeeping	6
B2. Retention of monitoring data	6
B3. Reporting	6
B4. Certification	6
B5. Annual compliance certification	6
B6. Submission of compliance certification	7
B7. Emergency provisions	7
B8. Excess emissions reporting	7
B9. Malfunctions, startups and shutdowns - reasonable measures required	8
B10. Reserved	8
B11. Report required upon the issuance of notice of violation	8

SECTION C

PERMIT CHANGES

C1. Operational flexibility changes	9
C2. Section 502(b)(10) changes	9
C3. Administrative amendment	9
C4. Minor permit modifications	10
C5. Significant permit modifications	10
C6. New construction or modifications	10

CONTENTS

SECTION D

GENERAL APPLICABLE REQUIREMENTS

D1.	Visible emissions	11
D2.	General provisions and applicability for non-process gaseous emissions	11
D3.	Non-process emission	11
D4.	General provisions and applicability for process gaseous	11
D5.	Particulate emissions from process emission sources	11
D6.	Sulfur dioxide emission standards	11
D7.	Fugitive dust	12
D8.	Open burning	12
D9.	Asbestos	12
D10.	Annual certification of compliance	12
D11.	Emission Standards for Hazardous Air Pollutants	12
D12.	Standards of Performance for New Stationary Sources	12
D13.	Gasoline Dispensing Facilities	12
D14.	Internal Combustion Engines	12
D15.	Duty to Maintain/Repair	12

SECTION E

SOURCE SPECIFIC EMISSION STANDARDS, OPERATING LIMITATIONS, and MONITORING, RECORDKEEPING and REPORTING REQUIREMENTS

E1.	Fee payment: Actual emissions basis	13
E2.	Reporting requirements	16
	(a) Semiannual reports	16
	(b) Annual compliance certification	16
	(c) Other Reporting Requirements	17
	(d) Retention of Records	17
E3.	General Permit Requirements	18
E4.	74-0064-01: Two natural gas fired turbines	22
E5.	74-0064-03: One 4-cycle (stroke) rich-burn reciprocating natural gas-fired emergency generator engine	24
	End of Permit #583429	29

ATTACHMENT #1	Title V Fee Selection Form APC 36 (CN-1583) (Rev. 4-19)	2 pages
ATTACHMENT #2	Agreement Letter dated October 13, 2023	2 pages
ATTACHMENT #3	FERC NGA GAS TARIFF EXCERPT	6 pages
ATTACHMENT #4	General Provisions for sources subject to 40 CFR Part 63 Subpart ZZZZ	4 pages
ATTACHMENT #5	Opacity Matrix Decision Tree for Visible Emission Evaluation EPA Method 9, dated June 18, 1996 (amended September 11, 2013)	1 page
ATTACHMENT #6	EPA AP-42 FIFTH EDITION, VOLUME I CHAPTER 3: STATIONARY INTERNAL COMBUSTION SOURCES STATIONARY GAS TURBINES UNCONTROLLED EMISSION FACTORS FOR STATIONARY GAS TURBINES Revised April 2000, Table 3.1-2a	1 page
ATTACHMENT #7	EPA AP-42 FIFTH EDITION, VOLUME I CHAPTER 3: STATIONARY INTERNAL COMBUSTION SOURCES NATURAL GAS-FIRED RECIPROCATING ENGINES UNCONTROLLED EMISSION FACTORS FOR 4-STROKE RICH-BURN ENGINES Dated October 2024, Table 3.2-3	3 pages

SECTION A

GENERAL PERMIT CONDITIONS

A permit issued under the provisions of Tennessee Air Pollution Control Regulations (TAPCR) paragraph 1200-03-09-.02(11) is a permit issued pursuant to the requirements of Title V of the Federal Act and its implementing Federal regulations promulgated at 40 CFR, Part 70.

- A1. **Definitions.** Terms not otherwise defined in the permit shall have the meaning assigned to such terms in the referenced regulations.

TAPCR 1200-03 and 0400-30

- A2. **Compliance requirement.** All terms and conditions in a permit issued pursuant to TAPCR paragraph 1200-03-09-.02(11), including any provisions designed to limit a source's potential to emit, are enforceable by the Administrator and citizens under the Federal Act. The permittee shall comply with all conditions of its permit. Except for requirements specifically designated herein as not being federally enforceable (State Only), non-compliance with the permit requirements is a violation of the Federal Act and the Tennessee Air Quality Act and is grounds for enforcement action; for a permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. Non-compliance with permit conditions specifically designated herein as not being federally enforceable (State Only) is a violation of the Tennessee Air Quality Act and may be grounds for these actions.

TAPCR 1200-03-09-.02(11)(e)2(i) and 1200-03-09-.02(11)(e)1(vi)(I)

- A3. **Need to halt or reduce activity.** The need to halt or reduce activity is not a defense for noncompliance. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. However, nothing in this item shall be construed as precluding consideration of a need to halt or reduce activity as a mitigating factor in assessing penalties for noncompliance if the health, safety, or environmental impacts of halting or reducing operations would be more serious than the impacts of continuing operations.

TAPCR 1200-03-09-.02(11)(e)1(vi)(II)

- A4. **The permit.** The permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance, does not stay any permit condition.

TAPCR 1200-03-09-.02(11)(e)1(vi)(III)

- A5. **Property rights.** The permit does not convey any property rights of any sort, or any exclusive privilege.

TAPCR 1200-03-09-.02(11)(e)1(vi)(IV)

- A6. **Submittal of requested information.** The permittee shall furnish to the Technical Secretary, within a reasonable time, any information that the Technical Secretary may request in writing to determine whether cause exists for modifying, revoking and reissuing, or termination of the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Technical Secretary copies of records required to be kept by the permit. If the permittee claims that such information is confidential, the Technical Secretary may review that claim and hold the information in protected status until such time that the Board can hear any contested proceedings regarding confidentiality disputes. If the information is desired by EPA, the permittee may mail the information directly to EPA. Any claims of confidentiality for federal purposes will be determined by EPA.

TAPCR 1200-03-09-.02(11)(e)1(vi)(V)

- A7. Severability clause.** The requirements of this permit are severable. A dispute regarding one or more requirements of this permit does not invalidate or otherwise excuse the permittee from their duty to comply with the remaining portion of the permit.

TAPCR 1200-03-09.02(11)(e)1(v)

A8. Fee payment.

(a) The permittee shall pay an annual Title V fee in accordance with TAPCR 1200-03-26-.02(9) based upon the applicable base fee; the applicable permit modification fee(s); the responsible official's choice of actual emissions, allowable emissions, or a combination of actual and allowable emissions; and on the responsible official's choice of annual accounting period. An emission cap of 4,000 tons per year per regulated pollutant per major source SIC Code shall apply to actual or allowable based emission fees. A Title V annual emission fee will not be charged for emissions in excess of the cap. Title V annual emission fees will not be charged for carbon monoxide or for greenhouse gas pollutants solely because they are greenhouse gases.

(b) Title V sources shall pay allowable based emission fees until the beginning of the next annual accounting period following receipt of their initial Title V operating permit. At that time, the permittee shall begin paying their Title V fee based upon the applicable base fee; the applicable permit modification fee(s); and their choice of actual or allowable based fees, or mixed actual and allowable based fees. Once permitted, the Responsible Official may revise their existing fee choice by submitting a written request to the Division no later than December 31 of the annual accounting period for which the fee is due.

(c) When paying annual Title V emission fees, the permittee shall comply with all provisions of TAPCR Rule 1200-03-26-.02 and paragraph 1200-03-09-.02(11) applicable to such fees.

(d) Where more than one allowable emission limit is applicable to a regulated pollutant, the allowable emissions for the regulated pollutants shall not be double counted. Major sources subject to the provisions of TAPCR paragraph 1200-03-26-.02(9) shall apportion their emissions as follows to ensure that their fees are not double counted.

1. Emissions of hazardous air pollutants (HAP) that are included in the particulate matter (including PM₁₀) category or the volatile organic compound category shall be included in those categories.

2. HAP that are not included in either the particulate matter category or volatile organic compound category shall be included in the category of Hazardous Air Pollutants Not Included Above.

3. Each individual HAP is subject to the 4,000 ton cap provisions of TAPCR subparagraph 1200-03-26-.02(2)(i).

4. Major sources that wish to pay annual emission fees for PM₁₀ on an allowable emission basis may do so if they have a specific PM₁₀ allowable emission standard. If a major source has a total particulate emission standard, but wishes to pay annual emission fees on an actual PM₁₀ emission basis, it may do so if the PM₁₀ actual emission levels are proven to the satisfaction of the Technical Secretary. The method to demonstrate the actual PM₁₀ emission levels must be made as part of the source's major source operating permit in advance in order to exercise this option. The PM₁₀ emissions reported under these options shall not be subject to fees under the family of particulate emissions. The 4,000 ton cap provisions of TAPCR subparagraph 1200-03-26-.02(2)(i) shall also apply to PM₁₀ emissions.

(e) Emissions of pollutants that do not fall in one of the listed categories shall be included in the category of Miscellaneous Pollutants Not Listed Above. Each miscellaneous pollutant is subject to the 4,000-ton cap provisions.

TAPCR 1200-03-26-.02 and 1200-03-09-.02(11)(e)1(vii)

- A9. Permit revision not required.** A permit revision will not be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or process for changes that are provided for in the permit.

TAPCR 1200-03-09-.02(11)(e)1(viii)

- A10. Inspection and entry.** Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Technical Secretary or an authorized representative to perform the following for the purposes of determining compliance with the permit applicable requirements:

(a) Enter upon, at reasonable times, the permittee's premises where a source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;

(c) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and

(d) As authorized by the Clean Air Act and Chapter 1200-03-10 of the TAPCR, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

(e) "Reasonable times" shall be considered to be customary business hours unless reasonable cause exists to suspect noncompliance with the Act, TAPCR Division 1200-03 or any permit issued pursuant thereto and the Technical Secretary specifically authorizes an inspector to inspect a facility at any other time.

TAPCR 1200-03-09-.02(11)(e)3(ii)

A11. Permit shield.

(a) Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements as of the date of permit issuance, provided that:

1. Such applicable requirements are included and are specifically identified in the permit; or
2. The Technical Secretary, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the permit includes the determination or a concise summary thereof.

(b) Nothing in this permit shall alter or affect the following:

1. The provisions of section 303 of the Federal Act (emergency orders), including the authority of the Administrator under that section. Similarly, the provisions of T.C.A. §68201-109 (emergency orders) including the authority of the Governor under the section;
2. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
3. The applicable requirements of the acid rain program, consistent with section 408(a) of the Federal Act; or
4. The ability of EPA to obtain information from a source pursuant to section 114 of the Federal Act.

(c) Permit shield is granted to the permittee.

(d) The permit shield does not apply to permit changes made under the minor permit modification procedures of TAPCR subpart 1200-03-09-.02(11)(f)5(ii) nor the administrative permit amendment procedures of TAPCR part 1200-03-09-.02(11)(f)4, except that the permit shield may be extended for administrative permit amendments that meet the relevant requirements of TAPCR subparagraph 1200-03-09-.02(11)(e), subparagraph 1200-03-09-.02(11)(f) and subparagraph 1200-03-09-.02(11)(g) for significant permit modifications.

(e) The permit shield does not apply to off-permit changes made under the operational flexibility provisions of TAPCR part 1200-03-09-.02(11)(a)4.

TAPCR 1200-03-09-.02(11)(e)6 and 1200-03-09-.02(11)(f)4(iv)

A12. Permit renewal and expiration.

(a) An application for permit renewal must be submitted at least 180 days, but no more than 270 days, prior to the expiration of this permit. Permit expiration terminates the source's right to operate unless a timely and complete renewal application has been submitted.

(b) If the permittee submits a timely and complete application for permit renewal the source will not be considered to be operating without a permit until the Technical Secretary takes final action on the permit application, except as otherwise noted in TAPCR paragraph 1200-03-09-.02(11).

(c) This permit, its shield provided in Condition A11, and its conditions will be extended and effective after its expiration date provided that the source has submitted a timely, complete renewal application to the Technical Secretary.

TAPCR 1200-03-09-.02(11)(f)2 and 3, 1200-03-09-.02(11)(d)1(i)(III), and 120003-09.02(11)(a)2

A13. Reopening for cause.

(a) A permit shall be reopened and revised prior to the expiration of the permit under any of the circumstances listed below:

1. Additional applicable requirements under the Federal Act become applicable to the sources contained in this permit provided the permit has a remaining term of 3 or more years. Such a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the permit expiration date of this permit, unless the original has been extended pursuant to TAPCR part 1200-03-09-.02(11)(a)2.
2. Additional requirements become applicable to an affected source under the acid rain program.
3. The Technical Secretary or EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
4. The Technical Secretary or EPA determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

(b) Proceedings to reopen and issue a permit shall follow the same proceedings as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists, and not the entire permit. Such reopening shall be made as expeditiously as practicable.

(c) Reopenings for cause shall not be initiated before a notice of such intent is provided to the permittee by the Technical Secretary at least 30 days in advance of the date that the permit is to be reopened except that the Technical Secretary may provide a shorter time period in the case of an emergency. An emergency shall be established by the criteria of T.C.A. 68201109 or other compelling reasons that public welfare is being adversely affected by the operation of a source that is in compliance with its permit requirements.

(d) If the Administrator finds that cause exists to terminate, modify, or revoke and reissue a permit as identified in A13, he is required under federal rules to notify the Technical Secretary and the permittee of such findings in writing. Upon receipt of such notification, the Technical Secretary shall investigate the matter in order to determine if he agrees or disagrees with the Administrator's findings. If he agrees with the Administrator's findings, the Technical Secretary shall conduct the reopening in the following manner:

1. The Technical Secretary shall, within 90 days after receipt of such notification, forward to EPA a proposed determination of termination, modification, or revocation and reissuance, as appropriate. If the Administrator grants additional time to secure permit applications or additional information from the permittee, the Technical Secretary shall have the additional time period added to the standard 90-day time period.
2. EPA will evaluate the Technical Secretary's proposed revisions and respond as to their evaluation.
3. If EPA agrees with the proposed revisions, the Technical Secretary shall proceed with the reopening in the same manner prescribed under Condition A13(b) and Condition A13(c).
4. If the Technical Secretary disagrees with either the findings or the Administrator that a permit should be reopened or an objection of the Administrator to a proposed revision to a permit submitted pursuant to Condition A13(d), he shall bring the matter to the Board at its next regularly scheduled meeting for instructions as to how he should proceed. The permittee shall be required to file a written brief expressing their position relative to the Administrator's objection and have a responsible official present at the meeting to answer questions for the Board. If the Board agrees that EPA is wrong in their demand for a permit revision, they shall instruct the Technical Secretary to conform to EPA's demand, but to issue the permit under protest preserving all rights available for litigation against EPA.

TAPCR 1200-03-09-.02(11)(f)6 and 7

A14. Permit transference. An administrative permit amendment allows for a change of ownership or operational control of a source where the Technical Secretary determines that no other change in the permit is necessary, provided that the following requirements are met:

- (a) Transfer of ownership permit application is filed consistent with the provisions of TAPCR paragraph 1200-03-09-.03(6), and
- (b) written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new permittee has been submitted to the Technical Secretary.

TAPCR 1200-03-09-.02(11)(f)4(i)(IV) and 1200-03-09-.03(6)

A15. Air pollution alert. When the Technical Secretary has declared that an air pollution alert, an air pollution warning, or an air pollution emergency exists, the permittee must follow the requirements for that episode level as outlined in TAPCR paragraph 1200-03-09-.03(1) and TAPCR Rule 1200-03-15-.03.

A16. Construction permit required. Except as exempted in TAPCR Rule 1200-03-09-.04, or excluded in TAPCR subparagraph 1200-03-02-.01(1)(aa) or TAPCR subparagraph 1200-03-02-.01(1)(cc), this facility shall not begin the construction of a new air contaminant source or the modification of an air contaminant source which may result in the discharge of air contaminants without first having applied for and received from the Technical Secretary a construction permit for the construction or modification of such air contaminant source.

TAPCR 1200-03-09-.01(1)(a)

A17. Notification of changes. The permittee shall notify the Technical Secretary 30 days prior to commencement of any of the following changes to an air contaminant source which would not be a modification requiring a construction permit.

- (a) change in air pollution control equipment
- (b) change in stack height or diameter
- (c) change in exit velocity of more than 25 percent or exit temperature of more than 15 percent based on absolute temperature.

TAPCR 1200-03-09-.02(7)

- A18. Schedule of compliance.** The permittee will comply with any applicable requirement that becomes effective during the permit term on a timely basis and no later than required by the provisions of the new applicable requirement. If the permittee is not in compliance the permittee must submit a schedule for coming into compliance which must include a schedule of remedial measure(s), including an enforceable set of deadlines for specific actions.

TAPCR 1200-03-09-.02(11)(d)3, 1200-03-09-.03(8), 0400-30-38, 0400-30-39, and 40 CFR Part 70.5(c)

A19. Title VI.

(a) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR, Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B:

- 1.** Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to Section 82.156.
- 2.** Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to Section 82.158.
- 3.** Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to Section 82.161.

(b) If the permittee performs a service on motor (fleet) vehicles when this service involves ozone depleting substance refrigerant in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR, Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.

(c) The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR, Part 82, Subpart G, Significant New Alternatives Policy Program.

TAPCR 1200-03-09-.03(8)

- A20. 112 (r).** Sources which are subject to the provisions of Section 112(r) of the federal Clean Air Act or any federal regulations promulgated thereunder, shall annually certify in writing to the Technical Secretary that they are properly following their risk management plan. The annual certification is due in the office of the Technical Secretary no later than January 31 of each year. Said certification will be for the preceding calendar year.

TAPCR 1200-03-32-.03(3)

SECTION B

GENERAL CONDITIONS for MONITORING, REPORTING, and ENFORCEMENT

B1. Recordkeeping. Monitoring and related record keeping shall be performed in accordance with the requirements specified in the permit conditions for each individual permit unit. In no case shall reports of any required monitoring and record keeping be submitted less frequently than every six months.

(a) Where applicable, records of required monitoring information include the following:

1. The date, place as defined in the permit, and time of sampling or measurements;
2. The date(s) analyses were performed;
3. The company or entity that performed the analysis;
4. The analytical techniques or methods used;
5. The results of such analyses; and
6. The operating conditions as existing at the time of sampling or measurement.

(b) Digital data accumulation which utilizes valid data compression techniques shall be acceptable for compliance determination as long as such compression does not violate an applicable requirement and its use has been approved in advance by the Technical Secretary.

TAPCR 1200-03-09-.02(11)(e)1(iii)

B2. Retention of monitoring data. The permittee shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

TAPCR 1200-03-09-.02(11)(e)1(iii)(II)

B3. Reporting. Reports of any required monitoring and record keeping shall be submitted to the Technical Secretary in accordance with the frequencies specified in the permit conditions for each individual permit unit. Reports shall be submitted within 60 days of the close of the reporting period unless otherwise noted. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by a responsible official. Reports required under "State only requirements" are not required to be certified by a responsible official.

TAPCR 1200-03-09-.02(11)(e)1(iii)

B4. Certification. Except for reports required under "State Only" requirements, any application form, report or compliance certification submitted pursuant to the requirements of this permit shall contain certification by a responsible official of truth, accuracy and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

TAPCR 1200-03-09-.02(11)(d)4

B5. Annual compliance certification. The permittee shall submit annually compliance certifications with terms and conditions contained in Sections A, B, D and E of this permit, including emission limitations, standards, or work practices. This compliance certification shall include all of the following (provided that the identification of applicable information may cross-reference the permit or previous reports, as applicable):

- (a) The identification of each term or condition of the permit that is the basis of the certification;
- (b) The identification of the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period; such methods and other means shall include, at a minimum, the methods and means required by this permit. If necessary, the owner or operator also shall identify any other material information that must be included in the certification to comply with section 113(c)(2) of the Federal Act, which prohibits knowingly making a false certification or omitting material information;
- (c) The status of compliance with the terms and conditions of the permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent. The certification shall be based on the method or means designated in B5(b) above. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion* or exceedance** as defined below occurred; and
- (d) Such other facts as the Technical Secretary may require to determine the compliance status of the source.

* "Excursion" shall mean a departure from an indicator range established for monitoring under this paragraph, consistent with any averaging period specified for averaging the results of the monitoring.

** "Exceedance" shall mean a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of a percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.

40 CFR Part 70.6(c)(5)(iii) as amended in the Federal Register Vol. 79, No.144, July 28, 2014, pages 43661 through 43667

B6. Submission of compliance certification. The compliance certification shall be submitted to:

The Tennessee Department of Environment and Conservation Environmental Field Office specified in Section E of this permit	and	U.S. EPA Compliance and Emissions Data Reporting Interface (CEDRI) or Air Enforcement Branch US EPA Region IV EPA_R4_CAA_Reports@epa.gov
---	-----	--

TAPCR 1200-03-09-.02(11)(e)3(v)(IV)

B7. Emergency provisions. An emergency constitutes an affirmative defense to an enforcement action brought against this source for noncompliance with a technology-based emission limitation due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

(a) The affirmative defense of the emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

1. An emergency occurred and that the permittee can identify the probable cause(s) of the emergency. "Probable" must be supported by a credible investigation into the incident that seeks to identify the causes and results in an explanation supported by generally accepted engineering or scientific principles.

2. The permitted source was at the time being properly operated. In determining whether or not a source was being properly operated, the Technical Secretary shall examine the source's written standard operating procedures which were in effect at the time of the noncompliance and any other code as detailed below that would be relevant to preventing the noncompliance. Adherence to the source's standard operating procedures will be the test of adequate preventative maintenance, careless operation, improper operation or operator error to the extent that such adherence would prevent noncompliance. The source's failure to follow recognized standards of practice to the extent that adherence to such a standard would have prevented noncompliance will disqualify the source from any claim of an emergency and an affirmative defense.

3. During the period of the emergency, the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit.

4. The permittee submitted notice of the emergency to the Technical Secretary according to the notification criteria for malfunctions in TAPCR Rule 12000320.03. For the purposes of this condition, "emergency" shall be substituted for "malfunction(s)" in TAPCR Rule 12000320.03 to determine the relevant notification threshold. The notice shall include a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

(b) In any enforcement proceeding the permittee seeking to establish the occurrence of an emergency has the burden of proof.

(c) The provisions of this condition are in addition to any emergency, malfunction or upset requirement contained in TAPCR Divisions 1200-03 and 0400-30 or other applicable requirement.

TAPCR 1200-03-09-.02(11)(e)7

B8. Excess emissions reporting.

(a) The permittee shall promptly notify the Technical Secretary when any emission source, air pollution control equipment, or related facility breaks down in such a manner to cause the emission of air contaminants in excess of the applicable emission standards contained in TAPCR Division 1200-03 or any permit issued thereto, or of sufficient duration to cause damage to property or public health. The permittee must provide the Technical Secretary with a statement giving all pertinent facts, including the estimated duration of the breakdown, the probable cause of the deviation, and any corrective actions or preventative measures taken. Violations of the visible emission standard which occur for less than 20 minutes in one day (midnight to midnight) need not be reported. Prompt notification will be within 24 hours of the malfunction and shall be provided by telephone to the Division's Nashville office. The Technical Secretary shall be notified when the condition causing the failure or breakdown has been corrected. In attainment and unclassified areas if emissions other than from sources designated as significantly impacting on a nonattainment area in excess of the standards will not

and do not occur over more than a 24-hour period (or will not recur over more than a 24-hour period) and no damage to property and or public health is anticipated, notification is not required.

(b) Any malfunction that creates an imminent hazard to health must be reported by telephone immediately to the Division's Nashville office at (615) 532-0554 and to the State Civil Defense.

(c) A log of all malfunctions, startups, and shutdowns resulting in emissions in excess of the standards in TAPCR Division 1200-03 or any permit issued thereto must be kept at the plant. All information shall be entered in the log no later than twenty-four (24) hours after the startup or shutdown is complete, or the malfunction has ceased or has been corrected. Any later discovered corrections can be added in the log as footnotes with the reason given for the change. This log must record at least the following:

1. Stack or emission point involved
2. Time malfunction, startup, or shutdown began and/or when first noticed
3. Type of malfunction and/or reason for shutdown
4. Time startup or shutdown was complete or time the air contaminant source returned to normal operation
5. The company employee making entry on the log must sign, date, and indicate the time of each log entry

The information under items 1. and 2. must be entered into the log by the end of the shift during which the malfunction or startup began. For any source utilizing continuous emission(s) monitoring, continuous emission(s) monitoring collection satisfies the above log keeping requirement.

TAPCR 1200-03-20-.03 and .04

- B9. Malfunctions, startups and shutdowns - reasonable measures required.** The permittee must take all reasonable measures to keep emissions to a minimum during startups, shutdowns, and malfunctions. These measures may include installation and use of alternate control systems, changes in operating methods or procedures, cessation of operation until the process equipment and/or air pollution control equipment is repaired, maintaining sufficient spare parts, use of overtime labor, use of outside consultants and contractors, and other appropriate means. Failures that are caused by poor maintenance, careless operation or any other preventable upset condition or preventable equipment breakdown shall not be considered malfunctions. This provision does not apply to standards found in 40 CFR, Parts 60(Standards of performance for new stationary sources), 61(National emission standards for hazardous air pollutants) and 63(National emission standards for hazardous air pollutants for source categories).

TAPCR 1200-03-20-.02

- B10.** Reserved.

- B11. Report required upon the issuance of a notice of violation for excess emissions.** The permittee must submit, within twenty days after receipt of the notice of violation, the data required below. If this data has been made available to the Technical Secretary prior to the issuance of the notice of violation no further action is required of the violating source. However, if the source desires to submit additional information, then this must be submitted within the same 20-day time period. The minimum data requirements are:

- (a) The identity of the stack and/or other emission point where the excess emission(s) occurred;
- (b) The magnitude of the excess emissions expressed in pounds per hour and the units of the applicable emission limitation(s) and the operating data and calculations used in determining the magnitude of the excess emissions;
- (c) The time and duration of the emissions;
- (d) The nature and cause of such emissions;
- (e) For malfunctions, the steps taken to correct the situation and the action taken or planned to prevent the recurrence of such malfunctions;
- (f) The steps taken to limit the excess emissions during the occurrence reported, and
- (g) If applicable, documentation that the air pollution control equipment, process equipment, or processes were at all times maintained and operated in a manner consistent with good operating practices for minimizing emissions.

Failure to submit the required report within the 20-day period specified shall preclude the admissibility of the data for determination of potential enforcement action.

TAPCR 1200-03-20-.06(2), (3) and (4)

SECTION C

PERMIT CHANGES

- C1. Operational flexibility changes.** The source may make operational flexibility changes that are not addressed or prohibited by the permit without a permit revision subject to the following requirements:
- (a) The change cannot be subject to a requirement of Title IV of the Federal Act or TAPCR Chapter 1200-03-30.
 - (b) The change cannot be a modification under any provision of Title I of the federal Act or TAPCR Division 1200-03.
 - (c) Each change shall meet all applicable requirements and shall not violate any existing permit term or condition.
 - (d) The source must provide contemporaneous written notice to the Technical Secretary and EPA of each such change, except for changes that are below the threshold of levels that are specified in TAPCR Rule 1200-03-09-.04.
 - e. Each change shall be described in the notice including the date, any change in emissions, pollutants emitted, and any applicable requirements that would apply as a result of the change.
 - (f) The change shall not qualify for a permit shield under the provisions of TAPCR part 1200-03-09-.02(11)(e)6.
 - (g) The permittee shall keep a record describing the changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes. The records shall be retained until the changes are incorporated into subsequently issued permits.

TAPCR 1200-03-09-.02(11)(a)4(ii)

- C2. Section 502(b)(10) changes.**
- (a) The permittee can make certain changes without requiring a permit revision, if the changes are not modifications under Title I of the Federal Act or TAPCR Division 1200-03 and the changes do not exceed the emissions allowable under the permit. The permittee must, however, provide the Administrator and Technical Secretary with written notification within a minimum of 7 days in advance of the proposed changes. The Technical Secretary may waive the 7-day advance notice in instances where the source demonstrates in writing that an emergency necessitates the change. Emergency shall be demonstrated by the criteria of TAPCR part 1200-03-09-.02(11)(e)7 and in no way shall it include changes solely to take advantages of an unforeseen business opportunity. The Technical Secretary and EPA shall attach each such notice to their copy of the relevant permit.
 - (b) The written notification must be signed by a facility Title V responsible official and include the following:
 - 1. a brief description of the change within the permitted facility;
 - 2. the date on which the change will occur;
 - 3. a declaration and quantification of any change in emissions;
 - 4. a declaration of any permit term or condition that is no longer applicable as a result of the change; and
 - 5. a declaration that the requested change is not a Title I modification and will not exceed allowable emissions under the permit.
 - (c) The permit shield provisions of TAPCR part 1200-03-09-.02(11)(e)6 shall not apply to Section 502(b)(10) changes.

TAPCR 1200-03-09-.02(11)(a)4(i)

- C3. Administrative amendment.**
- (a) Administrative permit amendments to this permit shall be in accordance with TAPCR part 1200-03-09-.02(11)(f)4. The source may implement the changes addressed in the request for an administrative amendment immediately upon submittal of the request.
 - (b) The permit shield shall be extended as part of an administrative permit amendment revision consistent with the provisions of TAPCR part 120003-09.02(11)(e)6 for such revisions made pursuant to item (c) of this condition which meet the relevant requirements of TAPCR subparagraph 120003-09.02(11)(e), TAPCR subparagraph 120003-09.02(11)(f) and TAPCR subparagraph 120003-09.02(11)(g) for significant permit modifications.
 - (c) Proceedings to review and grant administrative permit amendments shall be limited to only those parts of the permit for which cause to amend exists, and not the entire permit.

TAPCR 1200-03-09-.02(11)(f)4

C4. Minor permit modifications.

- (a) The permittee may submit an application for a minor permit modification in accordance with TAPCR subpart 1200-03-09-.02(11)(f)5(ii).
- (b) The permittee may make the change proposed in its minor permit modification immediately after an application is filed with the Technical Secretary.
- (c) Proceedings to review and modify permits shall be limited to only those parts of the permit for which cause to modify exists, and not the entire permit.
- (d) Minor permit modifications do not qualify for a permit shield.

TAPCR 1200-03-09-.02(11)(f)5(ii)

C5. Significant permit modifications.

- (a) The permittee may submit an application for a significant modification in accordance with TAPCR subpart 1200-03-09-.02(11)(f)5(iv).
- (b) Proceedings to review and modify permits shall be limited to only those parts of the permit for which cause to modify exists, and not the entire permit.

TAPCR 1200-03-09-.02(11)(f)5(iv)

C6. New construction or modifications.

Future construction at this facility that is subject to the provisions of TAPCR Rule 1200-03-09-.01 shall be governed by the following:

- (a) The permittee shall designate in their construction permit application the route that they desire to follow for the purposes of incorporating the newly constructed or modified sources into their existing operating permit. The Technical Secretary shall use that information to prepare the operating permit application submittal deadlines in their construction permit.
- (b) Sources desiring the permit shield shall choose the administrative amendment route of TAPCR part 120003-09.02(11)(f)4 or the significant modification route of TAPCR subpart 1200-03-09-.02(11)(f)5(iv).
- (c) Sources desiring expediency instead of the permit shield shall choose the minor permit modification procedure route of TAPCR subpart 1200-03-09-.02(11)(f)5(ii) or group processing of minor modifications under the provisions of TAPCR subpart 1200-03-09-.02(11)(f)5(iii) as applicable to the magnitude of their construction.

TAPCR 1200-03-09-.02(11)(d)1(i)(V)

SECTION D

GENERAL APPLICABLE REQUIREMENTS

D1. Visible emissions.

(a) With the exception of air emission sources exempt from the requirements of TAPCR Chapter 1200-03-05 and air emission sources for which a different opacity standard is specifically provided elsewhere in this permit, the permittee shall not cause, suffer, allow or permit discharge of a visible emission from any air contaminant source with an opacity in excess of twenty (20) percent for an aggregate of more than five (5) minutes in any one (1) hour or more than 20 minutes in any twenty-four (24) hour period; provided, however, that for fuel burning installations with fuel burning equipment of input capacity greater than 600 million btu per hour, the permittee shall not cause, suffer, allow, or permit discharge of a visible emission from any fuel burning installation with an opacity in excess of 20 percent (6-minute average) except for one six minute period per one hour of not more than 40 percent opacity. Sources constructed or modified after July 7, 1992, shall utilize 6-minute averaging.

(b) Consistent with the requirements of TAPCR Chapter 1200-03-20, due allowance may be made for visible emissions in excess of that permitted under TAPCR Chapter 1200-03-05 which are necessary or unavoidable due to routine startup and shutdown conditions. The facility shall maintain a continuous, current log of all excess visible emissions showing the time at which such conditions began and ended and that such record shall be available to the Technical Secretary or an authorized representative upon request.

TAPCR 1200-03-05-.01(1), TAPCR 1200-03-05-.03(6) and TAPCR 1200-03-05-.02(1)

D2. General provisions and applicability for non-process gaseous emissions. Any person constructing or otherwise establishing a nonportable air contaminant source emitting gaseous air contaminants after April 3, 1972, or relocating an air contaminant source more than 1.0 km from the previous position after November 6, 1988, shall install and utilize the best equipment and technology currently available for controlling such gaseous emissions.

TAPCR 1200-03-06-.03(2)

D3. Non-process emission standards. The permittee shall not cause, suffer, allow, or permit particulate emissions from non-process sources in excess of the standards in TAPCR Chapter 1200-03-06.**D4. General provisions and applicability for process gaseous emissions.** Any person constructing or otherwise establishing an air contaminant source emitting gaseous air contaminants after April 3, 1972, or relocating an air contaminant source more than 1.0 km from the previous position after November 6, 1988, shall install and utilize equipment and technology which is deemed reasonable and proper by the Technical Secretary.

TAPCR 1200-03-07-.07(2)

D5. Particulate emissions from process emission sources. The permittee shall not cause, suffer, allow, or permit particulate emissions from process sources in excess of the standards in TAPCR part 1200-03-07.**D6. Sulfur dioxide emission standards.** The permittee shall not cause, suffer, allow, or permit sulfur dioxide emissions from process and non-process sources in excess of the standards in TAPCR Chapter 1200-03-14. Regardless of the specific emission standard, new process sources shall utilize the best available control technology as deemed appropriate by the Technical Secretary of the Tennessee Air Pollution Control Board.

D7. Fugitive Dust.

(a) The permittee shall not cause, suffer, allow, or permit any materials to be handled, transported, or stored; or a building, its appurtenances, or a road to be used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne. Such reasonable precautions shall include, but not be limited to, the following:

1. Use, where possible, of water or chemicals for control of dust in demolition of existing buildings or structures, construction operations, grading of roads, or the clearing of land;
2. Application of asphalt, water, or suitable chemicals on dirt roads, material stockpiles, and other surfaces which can create airborne dusts;
3. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials. Adequate containment methods shall be employed during sandblasting or other similar operations.

(b) The permittee shall not cause, suffer, allow, or permit fugitive dust to be emitted in such manner to exceed five (5) minutes per hour or 20 minutes per day as to produce a visible emission beyond the property line of the property on which the emission originates, excluding malfunction of equipment as provided in TAPCR Chapter 1200-03-20.

TAPCR 1200-03-08

D8. Open burning. The permittee shall comply with the TAPCR Chapter 1200-03-04 for all open burning activities at the facility.

TAPCR 1200-03-04

D9. Asbestos. Where applicable, the permittee shall comply with the requirements of 40 CFR Part 61 when conducting any renovation or demolition activities at the facility.

TAPCR 0400-30-38-.01(2) and 40 CFR, Part 61

D10. Annual certification of compliance. The generally applicable requirements set forth in Section D of this permit are intended to apply to activities and sources that are insignificant emission units or activities. By annual certification of compliance with the conditions in this Section the permittee shall be considered to meet the monitoring and related record keeping and reporting requirements of TAPCR subpart 1200-03-09-.02(11)(e)1(iii) and part 1200-03-10-.04(2)(b)1 and the compliance requirements of TAPCR subpart 1200-03-09-.02(11)(e)3(i). The permittee shall submit compliance certification for these conditions annually.

D11. Emission Standards for Hazardous Air Pollutants. The permittee shall comply with all applicable requirements of TAPCR Chapter 0400-30-38 for all emission sources subject to a requirement contained therein.

D12. Standards of Performance for New Stationary Sources. The permittee shall comply with all applicable requirements of TAPCR chapter 0400-30-39 for all emission sources subject to a requirement contained therein.

D13. Gasoline Dispensing Facilities. The permittee shall comply with all applicable requirements of TAPCR Rule 1200-03-18-.24 for all emission sources subject to a requirement contained therein.

D14. Internal Combustion Engines.

a. All stationary reciprocating internal combustion engines, including engines deemed insignificant activities and insignificant emission units, shall comply with the applicable provisions of TAPCR Rule 0400-30-38-.01.

b. All stationary compression ignition internal combustion engines, including engines deemed insignificant activities and insignificant emission units, shall comply with the applicable provisions of TAPCR Chapter 0400-30-39.

c. All stationary spark ignition internal combustion engines, including engines deemed insignificant activities and insignificant emission units, shall comply with the applicable provisions of TAPCR Chapter 0400-30-39.

TAPCR 0400-30-38 and 39

D15. Duty to Maintain/Repair. The permittee shall maintain and repair each emission source, associated air pollution control device(s), and compliance assurance monitoring equipment as required to maintain and assure compliance with the specified emission limits.

TAPCR 1200-03-09-.03(8)

SECTION E

SOURCE SPECIFIC EMISSION STANDARDS, OPERATING LIMITATIONS, and MONITORING, RECORDKEEPING and REPORTING REQUIREMENTS

74-0064	Facility Description:	Natural Gas Pipeline Compressor Station: 01: Three Solar® Model 010-01202S0 1,242 bhp at ISO (1,313 bhp @ 0.01 °F) (14.95 MMBtu/hr @ 59.86 °F) Natural Gas-Fired Combustion Turbines 03: One Ford C50G-6005-A Natural Gas-Fired Standby 4 Stroke Rich Burn Emergency Generator Engine [0.71 MMBTU/hr, 68 bhp]
---------	-----------------------	--

E1. Fee payment

FEE EMISSIONS SUMMARY TABLE FOR MAJOR SOURCE 74-0064

REGULATED POLLUTANTS	ALLOWABLE EMISSIONS (tons per AAP)	ACTUAL EMISSIONS (tons per AAP)	COMMENTS
PARTICULATE MATTER (PM)	1.45	AEAR	Includes all fee emissions
SO ₂	12.10	AEAR	Includes all fee emissions
VOC	5.41	AEAR	Includes all fee emissions
NO _x	105.86	AEAR	Includes all fee emissions
Facility-Wide Total HAP Limit	N/A	AEAR	N/A
Facility-Wide Individual HAP Limit	N/A	AEAR	N/A
HAZARDOUS AIR POLLUTANTS (HAPs) NOT INCLUDED ABOVE*			
N/A	N/A	AEAR	N/A
N/A	N/A	AEAR	N/A
N/A	N/A	AEAR	N/A
MISCELLANEOUS POLLUTANTS NOT LISTED ABOVE**			
EACH MISC POLLUTANT NOT LISTED ABOVE			
N/A	N/A	AEAR	N/A
N/A	N/A	AEAR	N/A
N/A	N/A	AEAR	N/A
N/A	N/A	AEAR	N/A

NOTES

AAP The Annual Accounting Period (AAP) is a 12 consecutive month period that **either (a) begins each July 1st and ends June 30th of the following year when fees are paid on a fiscal year basis, or (b) begins January 1st and ends December 31st of the same year when paying on a calendar year basis.** The AAP at the time of initial permit issuance began **January 1, 2026 and ends December 31, 2026.** The next Annual Accounting Period begins **January 1, 2027 and ends December 31, 2027** unless a request to change the annual accounting period is submitted by the responsible official as required by subparagraph 1200-03-26-.02(9)(b) and approved by the Technical Secretary. If the permittee wishes to revise their AAP or their annual emission fee basis for any annual accounting period following the initial AAP as allowed by subparagraph 1200-03-26-.02(9)(b) of the TAPCR, the responsible official must submit the request to the Division in writing on or before December 31 of the annual accounting period for which the fee is due. If a change in fee basis from allowable emissions to actual emissions for any pollutant is requested, the request from the responsible official must include the methods that will be used to determine actual emissions. **Changes in fee bases must be made using the Title V Fee Selection form, form number APC 36 (CN-1583), included as an attachment to this permit and available on the Division of Air Pollution Control's website.**

N/A N/A indicates that no emissions are specified for fee computation.

AEAR If the permittee is paying annual emission fees on an actual emissions basis, **AEAR** indicates that an Actual Emissions Analysis is Required to determine the actual emissions of:

- (1) **each regulated pollutant** (Particulate matter [PM], SO₂, VOC, NO_x and so forth. See TAPCR 1200-03-26-.02(2)(i) for the definition of a regulated pollutant.),
- (2) the “**HAP Not Included Above**” Category (**non-VOC and non-PM HAP not included in a facility-wide limit**), and
- (3) the **Miscellaneous Category**

under consideration during the **Annual Accounting Period**.

* **Hazardous Air Pollutants Not Included Above:** This category is made-up of hazardous air pollutants that are not included in the VOC or PM category, such as HCl and HF, and are not included in a facility-wide HAP emission limitation. **For fee computation**, each individual hazardous air pollutant is subject to the 4,000-ton cap provisions of subparagraph 1200-03-26-.02(2)(i) of the TAPCR.

** **Miscellaneous Pollutants Not Listed Above:** This category is for pollutants that are not included in one of the other categories but for which an emission limitation has been established in this permit (including NSPS pollutants). **For fee computation**, each pollutant in this category is subject to the 4,000-ton cap provisions of subparagraph 1200-03-26-.02(2)(i).

END NOTES

- The permittee shall:**
- (1) Pay the **full base fee plus the allowable emissions fee and any applicable modification fees** for the fractional remainder of the calendar year commencing upon the source’s startup.
TAPCR 1200-03-26-.09(2)(b)4
 - (2) For subsequent annual accounting periods, pay **Title V annual fees** (including the emissions fee, base fee, significant modification fee, & minor modification fee) on the emissions and year bases requested by the responsible official and approved by the Technical Secretary, for each annual accounting period (AAP) by the payment deadline(s) established in TAPCR 1200-03-26-.02(9)(a). Fees may be paid on an **actual, allowable, or mixed** emissions basis, and on either a **state fiscal year** or a **calendar year**, provided the requirements of 1200-03-26-.02(9)(b) are met. If any part of any fee imposed under TAPCR 1200-03-26-.02 is not paid within 15 days of the due date, penalties shall at once accrue as specified in TAPCR 1200-03-26-.02(8).
 - (3) Sources paying annual fees on an allowable emissions basis: pay annual fees for each AAP no later than April 1 of each year pursuant to TAPCR 1200-03-26-.02(9)(d).
TAPCR 1200-03-26-.02(9)(a)2(i)
 - (4) Sources paying annual fees on a calendar year basis and an actual or mixed emissions basis: pay annual fees for each AAP no later than April 1 of each year pursuant to TAPCR 1200-03-26-.02(9)(d), except as allowed by TAPCR 1200-03-26-.02(9)(g)3.
TAPCR 1200-03-26-.02(9)(a)2(ii)
 - (5) Sources paying annual fees on a fiscal year basis and an actual or mixed emissions basis: for each AAP, pay an estimated 65% of the fee due no later than April 1 of the current fiscal year. The remainder of the fee for each AAP is due no later than August 1 of each year pursuant to TAPCR 1200-03-26-.02(9)(d), except as allowed by TAPCR 1200-03-26-.02(9)(g)3.
TAPCR 1200-03-26-.02(9)(a)2(iii)
 - (6) Sources paying annual fees on an actual emissions basis: prepare an **actual emissions analysis** for each AAP and pay **actual based emission fees** pursuant to TAPCR 1200-03-26-.02(9)(d). The **actual emissions analysis** shall include:
 - (a) the completed **Fee Emissions Summary Table**,
 - (b) each **actual emissions analysis** required, and
 - (c) the actual emission records for each pollutant and each source as required for actual emission fee determination, or a summary of the actual emission records required for fee

determination, as specified by the Technical Secretary or the Technical Secretary's representative. The summary must include sufficient information for the Technical Secretary to determine the accuracy of the calculations. These calculations must be based on the Fee Year basis approved by the Technical Secretary (a state fiscal year [July 1 through June 30] or a calendar year [January 1 through December 31]). These records shall be used to complete the **actual emissions analyses** required by the above **Fee Emissions Summary Table**.

TAPCR 1200-03-26-.02(9)(g)2

- (7) Sources paying annual fees on a mixed emissions basis: for all pollutants and all sources for which the permittee has chosen an actual emissions basis, prepare an **actual emissions analysis** for each AAP and pay **actual based emission fees** pursuant to TAPCR 1200-03-26-.02(9)(d). The **actual emissions analysis** shall include:

- (a) the completed **Fee Emissions Summary Table**,
- (b) each **actual emissions analysis** required, and
- (c) the actual emission records for each pollutant and each source as required for actual emission fee determination, or a summary of the actual emission records required for fee determination, as specified by the Technical Secretary or the Technical Secretary's representative. The summary must include sufficient information for the Technical Secretary to determine the accuracy of the calculations. These calculations must be based on the Fee Year basis approved by the Technical Secretary (a state fiscal year [July 1 through June 30] or a calendar year [January 1 through December 31]). These records shall be used to complete the **actual emissions analysis**.

For all pollutants and all sources for which the permittee has chosen an allowable emissions basis, pay allowable based emission fees pursuant to TAPCR 1200-03-26-.02(9)(d).

TAPCR 1200-03-26-.02(9)(g)2

- (8) When paying on an actual or mixed emissions basis, submit the **actual emissions analyses** at the time the fees are paid in full or earlier.

TAPCR 1200-03-26-.02(9)(g)2

- (9) Include with each required AEAR report the following statement signed by the Responsible Official: *"I have reviewed this document in its entirety, and to the best of my knowledge, based on information and belief formed after reasonable inquiry, the statements and information contained in this document are true, accurate, and complete."*

TAPCR 1200-03-09-.02(11)(d)4

The annual fee due dates are specified in TAPCR 1200-03-26-.02(9)(g). With the exception of the fee due for the initial annual accounting period, due dates are dependent on the Responsible Official's choice of fee bases as described above for AAPs following the AAP in which the permit is issued. If any part of any fee imposed under TAPCR 1200-03-26-.02 is not paid within 15 days of the due date, penalties shall at once accrue as specified in TAPCR 1200-03-26-.02(8). Emissions for regulated pollutants shall not be double counted as specified in Condition A8(d) of this permit.

Payment of the fee due and the actual emissions analysis (if required) shall be submitted to the Technical Secretary at the following address:

Payment of Fee to:

The Tennessee Department of Environment and Conservation
Division of Fiscal Services
Consolidated Fee Section – APC
Davy Crockett Tower, 6th Floor
500 James Robertson Parkway
Nashville, Tennessee 37243

Actual Emissions Analyses to:

A "Title V Emissions Summary Form" and the AEAR must be submitted electronically as directed by the Division. Additional information can be found at
<https://www.tn.gov/environment/air/inventory.html>

E2. Reporting requirements.

- (a) **Semiannual reports.** The first report shall cover the 6-month period from **January 1, 2027** to **June 30, 2027** and shall be submitted within 60 days after the 6-month period ending **June 30, 2027**. Subsequent reports shall be submitted within 60 days after the end of each 6-month period following the first report.

These semiannual reports shall include:

- (1) Any monitoring and recordkeeping required by **Condition E3-6, E4-7, E4-8, E5-2, E5-8, E5-10, E5-12 through E5-16**, of this permit. However, a summary report of this data is acceptable provided there is sufficient information to enable the Technical Secretary to evaluate compliance.
- (2) The visible emission evaluation readings from **Condition E3-5** of this permit if required. However, a summary report of this data is acceptable provided there is sufficient information to enable the Technical Secretary to evaluate compliance.
- (3) Identification of all instances of deviations from **ALL PERMIT REQUIREMENTS**. The record of deviations/excursions shall include, at a minimum, the time the deviation/excursion was discovered, the corrective action taken, and the time that the deviation/excursion was rectified.

These reports must be certified by a responsible official consistent with condition B4 of this permit and shall be submitted to The Technical Secretary at the address in Condition E2(b) of this permit.

TAPCR 1200-03-09-.02(11)(e)1.(iii)

- (b) **Annual compliance certification.** The permittee shall submit annually compliance certifications with each term or condition contained in Sections A, B, D and E of this permit, including emission limitations, standards, or work practices. This compliance certification shall include all of the following (provided that the identification of applicable information may cross-reference the permit or previous reports, as applicable):

- (1) The identification of each term or condition of the permit that is the basis of the certification;
- (2) The identification of the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period; Such methods and other means shall include, at a minimum, the methods and means required by this permit. If necessary, the owner or operator also shall identify any other material information that must be included in the certification to comply with section 113(c)(2) of the Federal Act, which prohibits knowingly making a false certification or omitting material information;
- (3) The status of compliance with each term or condition of the permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent. The certification shall be based on the method or means designated in E2(b)2 above. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion* or exceedance** as defined below occurred; and
- (4) Such other facts as the Technical Secretary may require to determine the compliance status of the source.

* "Excursion" shall mean a departure from an indicator range established for monitoring under this paragraph, consistent with any averaging period specified for averaging the results of the monitoring.

** "Exceedance" shall mean a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of a percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.

The first certification shall cover the 12-month period from **January 1, 2027**, to **December 31, 2027**, and shall be submitted within 60 days after the 12-month period ending **December 31, 2027**. Subsequent certifications shall be submitted within 60 days after the end of each 12-month period following the first certification.

These certifications shall be submitted to:

TN APCD and EPA

Division of Air Pollution Control
Nashville Environmental Field Office
711 R.S. Gass Blvd
Nashville, TN 37216
or
APC.NashEFO@tn.gov

and U.S. EPA Compliance and Emissions Data
Reporting Interface (CEDRI) or (only if
CEDRI is not working)
Air Enforcement Branch
US EPA Region IV
[EPA R4 CAA Reports@epa.gov](mailto:EPA_R4_CAA_Reports@epa.gov)

40 CFR Part 70.6(c)(5)(iii) as amended in the Federal Register Vol. 79, No.144, July 28, 2014, pages 43661 through 43667
TAPCR 1200-03-09-.02(11)(e)3.(v)

- (c) **Other Reporting Requirements** The permittee must submit the NSPS and/or NESHAP reports listed below, *each under separate cover or as a separate electronic (pdf) file, as follows*
1. **NESHAP** – 40 CFR Part 63 Subpart ZZZZ - *National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*
 - i. Semiannual compliance reports required by **Condition E5-17** of this permit. The first report after permit issuance shall cover the 6-month period from January 1, 2027, to June 30, 2027, and shall be submitted within 60 days after the 6-month period ending June 30, 2027. Subsequent reports shall be submitted within 60 days after the end of each 6-month period following the first report.

These reports must be certified by a responsible official consistent with Condition B-4 of this permit and shall be submitted to the Technical Secretary at the address in Condition E2(b) of this permit.

- (d) **Retention of Records** All records required by any condition in Section E of this permit must be retained for a period of not less than five years. Additionally, these records shall be kept available for inspection by the Technical Secretary or a Division representative.

TAPCR 1200-03-09-.02(11)(e)1.(iii)(II)II

E3. GENERAL PERMIT REQUIREMENTS

Conditions E3-1 through E3-13 apply to all sources in this permit, unless otherwise indicated.

E3-1. Identification of Responsible Official, Technical Contact, and Billing Contact

- (a) The application that was utilized in the preparation of this permit is dated February 12, 2025, and is signed by Responsible Official Stephen McFadden, Director Field Ops Central of the permitted facility. Notification was received January 20, 2026, that Diana Goff – Vice President, Operations GTM would assume the Responsible Official role. If the designated Responsible Official terminates employment or is assigned different duties and is no longer a Responsible Official for this facility as defined in part 1200-03-09-.02(11)(b)21 of the Tennessee Air Pollution Control Regulations, the owner or operator of this air contaminant source shall notify the Technical Secretary of the change. Said notification must be in writing and must be submitted within thirty (30) days of the change. The notification shall include the name and title of the new Responsible Official and certification of truth and accuracy. All representations, agreement to terms and conditions, and covenants made by the former Responsible Official that were used in the establishment of the permit terms and conditions will continue to be binding on the facility until such time that a revision to this permit is obtained that would change said representations, agreements, and/or covenants.
- (b) The application that was utilized in the preparation of this permit is dated February 12, 2025, and identifies Barry Goodrich as the Principal Technical Contact for the permitted facility. Notification was received April 17, 2026, that Susann Brown–Supervisor, Air Monitoring and Reporting would assume the Principal Technical Contact role. If the identified Principal Technical Contact terminates employment or is assigned different duties and is no longer the Principal Technical Contact for this facility, the owner or operator of this air contaminant source shall notify the Technical Secretary of the change. Said notification must be in writing and must be submitted within thirty (30) days of the change. The notification shall include the name and title of the new Principal Technical Contact and certification of truth and accuracy.
- (c) The application that was utilized in the preparation of this permit is dated February 12, 2025, and identifies Susann Brown as the Billing Contact for the permitted facility. If the identified Billing Contact terminates employment or is assigned different duties and is no longer the Billing Contact for this facility, the owner or operator of this air contaminant source shall notify the Technical Secretary of the change. Said notification must be in writing and must be submitted within thirty (30) days of the change. The notification shall include the name and title of the new Billing Contact and certification of truth and accuracy.

E3-2. Application and Agreement Letters

This source shall operate in accordance with the terms of this permit, the information submitted in the approved permit application(s) referenced in **Condition E3-1** of this permit, and any documented agreements made with the Technical Secretary.

TAPCR 1200-03-09-.01(1)(d)

E3-3. Submittals

Unless otherwise specified within this permit, the permittee shall submit, preferably via email and in Adobe Portable Document format (PDF), all applicable plans, checklists, certifications, notifications, test protocols, reports, and applications to the attention of the following Division Programs at the email addresses indicated in the table below:

Permitting Program	Compliance Validation Program	Field Services Program
• Notifications • Startup certifications • Applications • NSPS reports • MACT/GACT/NESHAP reports • Emission statements	• Test protocols • Emission test reports • Visible emission evaluation reports	• Semiannual reports • Annual compliance certifications/status reports
Division of Air Pollution Control Davy Crockett Tower, 7 th Floor 500 James Robertson Parkway Nashville, TN 37243 Air.Pollution.Control@tn.gov		Nashville EFO Division of Air Pollution Control 711 R.S. Gass Boulevard Nashville, TN 37216 APC.NashEFO@tn.gov

The permittee shall submit the information identified above as requested in this permit. In lieu of submitting this information to the email addresses above, the permittee may submit the information to the attention of the respective Division Programs at the mailing addresses listed above.

TAPCR 1200-03-09-.03(8)

E3-4. General Recordkeeping Requirements

(a) All recordkeeping requirements for all data required to be recorded shall follow the following schedules:

For Daily Recordkeeping	For Weekly Recordkeeping	For Monthly Recordkeeping
No later than seven days from the end of the day for which the data is required.	No later than seven days from the end of the week for which the data is required.	No later than 30 days from the end of the month for which the data is required.

(b) The information contained in logs, records, and submittals required by this permit shall be kept at the facility's address, unless otherwise noted, and provided to the Technical Secretary or a Division representative upon request. Computer-generated logs are acceptable. Compliance is assured by retaining the logs, records, and submittals specified in this permit for a period of not less than five years at the facility's address.

TAPCR 1200-03-10-.02(2)(a)

E3-5. Unless otherwise specified, visible emissions from sources at this facility shall not exhibit greater than twenty percent (20%) opacity, except for one (1) six-minute period in any one (1) hour period, and for no more than four (4) six-minute periods in any twenty-four (24) hour period. Visible emissions from this source shall be determined by EPA Method 9, as published in the current 40 CFR 60, Appendix A (six-minute average).

TAPCR 1200-03-05-.01(1) and 1200-03-05-.03(6)

Compliance method: The permittee shall assure compliance with the opacity standard by utilizing the opacity matrix dated June 18, 1996 (amended on September 11, 2013) that is enclosed as Attachment #5 to this permit. Reports and certifications shall be submitted in accordance with **Condition E2** of this permit.

If the magnitude and frequency of excursions reported by the permittee in the periodic monitoring for emissions is unsatisfactory to the Technical Secretary, this permit may be reopened to impose additional opacity monitoring requirements.

E3-6. Facility-wide Limitations

Only natural gas shall be used as fuel for the sources in this permit. The sources in this permit are only capable of burning this fuel. Should the permittee need to modify any of the sources in this permit to allow the use of a fuel other than natural gas, a construction permit or Title V modification shall be first applied for and received in accordance with TAPCR 1200-03-09-.01 or TAPCR 1200-03-09-.02(11)(d)1(i)(V) prior to making the change.

Compliance Method: The permittee shall maintain documentation to demonstrate the type(s) of fuel used by the sources. Documentation shall include, but is not limited to, a current, valid purchase contract, tariff sheet or transportation contract for the natural gas, specifying that the maximum total sulfur content of the natural gas is 20 grains/100 scf or less, manufacturer's specifications, purchase records, operating manuals, or a tag affixed to the unit by the manufacturer. These documents shall be kept readily available/accessible and made available upon request by the Technical Secretary or a Division representative.

TAPCR 1200-03-09-.03(8) and the application dated September 12, 2025

E3-7. NSPS/NESHAP/MACT/GACT Standards

The following source(s) are subject to and shall comply with all applicable requirements of each NSPS/NESHAP/MACT/GACT standard as indicated in the table below, including the General Provisions identified in Attachment #4 of this permit. The applicable requirements of each standard are incorporated into this permit pursuant to TAPCR 1200-03-09-.03(8) and TAPCR 0400-30-38-.01.

Source Number	NESHAP/MACT/GACT	NSPS
74-0064-03	ZZZZ	

TAPCR 1200-03-09-.03(8) and 0400-30-38-.01

Compliance Method: Compliance methods are provided in **Conditions E5-9 through E5-17** of this permit.

E3-8. Reserved**E3-9. Reserved****E3-10. Reserved**

- E3-11. Insignificant activities:** Insignificant activities identified in the Title V application per Rules 1200-03-09-.04(5) of the Tennessee Air Pollution Control Regulations are listed below. Additional insignificant activities may be added and operated at any time with the provision that a written notification shall be submitted to the Technical Secretary including an updated APC V.2 application form with a Truth, Accuracy, and Completeness statement signed by a responsible official. The permit may be updated to include additional insignificant sources by means of an administrative amendment if necessary. The addition of insignificant activities which are identified as insignificant per rules 1200-03-09-.04(5)f or (g) of the TAPCR does not require notification to the Division of Air Pollution Control.

Activity or Emissions Unit	Designation	Rating/Capacity	Rule (TAPCR) for Insignificant or Exempt Status
Miscellaneous Natural Gas Combustion	RIDG GHTR 01	0.081 MMBtu/hr	TAPCR 1200-3-9-.04(4)(a) & 1200-03-09-.04(5)(a)4.
	RIDG HVAC 01	0.043 MMBtu/hr	TAPCR 1200-3-9-.04(4)(a) & 1200-03-09-.04(5)(a)4.
	RIDG WHTR 01	0.022 MMBtu/hr	TAPCR 1200-3-9-.04(4)(a) & 1200-03-09-.04(5)(a)4.
Storage Vessels	RIDG TNKPL01	5,080 gal	TAPCR 1200-3-9-.04(4)(d)12.
Truck Loading Operations	RIDG TL PL	150 gal/min	TAPCR 1200-3-9-.04(4)(a) & 1200-03-09-.04(5)(a)4.
Gas Releases	RIDG GR ST	N/A	TAPCR 1200-3-9-.04(4)(c) & 1200-03-09-.04(5)(g)26.
	RIDG GR PL	N/A	TAPCR 1200-3-9-.04(4)(d)4.
Piping Components	RIDG PC NG	N/A	TAPCR 1200-3-9-.04(4)(d)4.
	RIDG PC PL	N/A	TAPCR 1200-3-9-.04(4)(d)4.
	RIDG PC PLOIL	N/A	TAPCR 1200-3-9-.04(4)(d)4.
Parts Washer	RIDG PW	N/A	TAPCR 1200-3-9-.04(4)(a) & 1200-03-09-.04(5)(a)4.

TAPCR 1200-03-09-.04(5)

- E3-12.** The permittee shall comply with all applicable federal and state regulations concerning the operation of the sources in this permit. This includes but is not limited to federal regulations published under 40 CFR Part 63 for sources of hazardous air pollutants and 40 CFR Part 60, New Source Performance Standards.

TAPCR 1200-03-09-.03(8)

- E3-13.** At the time of application, the potential to emit hazardous air pollutants from this facility was less than the major source applicability thresholds of 10 tons per year of a single hazardous air pollutant and less than 25 tons per year of a combination of hazardous air pollutants. The permittee must apply for and receive a construction permit in accordance with the procedures in Chapter 1200-03-09 of the Tennessee Air Pollution Control Regulations (TAPCR) prior to making any changes such that the potential to emit from hazardous air pollutants from the facility will meet and/or exceed these thresholds.

TAPCR 1200-03-09-.03(8) and the application dated February 12, 2025

E4. Emission Source 74-0064-01

74-0064-01	Source Description	Three Solar® Model 010-01202S0 1,242 bhp at ISO (1,313 bhp @ 0.01 °F) (14.95 MMBtu/hr @ 59.86 °F) Natural Gas-Fired Combustion Turbines
-------------------	---------------------------	--

Conditions E4-1 through E4-8 apply to source 74-0064-01

- E4-1.** The unit number, model, rated heat input rate, and power output capacities of the three natural gas-fired turbines are shown in the table below. This condition is a statement of the rated heat input rate, and power output capacity for the turbines. Should the permittee need to modify any turbine in a manner that increases its rated heat input rate, and/or power output capacity, a construction permit or Title V modification shall first be applied for and received in accordance with TAPCR 1200-03-09-.01 or TAPCR 1200-03-09-.02(11)(d)1(i)(V) prior to making the change.

Unit #	Model	Rated Heat Input (HHV) (MMBtu/hr)	Rated Power Output (horsepower)
TBC 01	Solar Model 010-01202SO	14.95	1,242
TBC 02	Solar Model 010-01202SO	14.95	1,242
TBC 03	Solar Model 010-01202SO	14.95	1,242

TAPCR 1200-03-09-.03(8) and the application dated February 12, 2025

Compliance method: The permittee shall maintain documentation to demonstrate the rated heat input rate, and power output capacity of each turbine. Documentation may include, but is not limited to, purchase records, operating manuals, or a tag affixed to the unit by the manufacturer. These documents shall be kept readily available/accessible and made available upon request by the Technical Secretary or a Division representative.

- E4-2.** Particulate matter (PM) emitted from the group of three combustion turbines shall not exceed **0.33** pounds per hour (lbs/hr) on a daily average basis (total for all three turbines).

TAPCR 1200-03-06-.01(7), the agreement letter dated October 13, 2023 (Attachment #2), and the application dated February 12, 2025

Compliance Method: Compliance with this emission limitation is assured by compliance with **Conditions E4-1 and E3-6** of this permit and the use of emission factor of 6.60 E-03 pounds per million Btu from Table 3.1-2a of AP-42, Chapter 3, Section 1, Stationary Gas Turbines, supplement to 5th Ed. dated 4/00 (Attachment #6).

- E4-3.** Sulfur dioxide (SO₂) emitted from the group of three combustion turbines shall not exceed **2.76** pounds per hour (lbs/hr) on a daily average basis (total for all three turbines).

TAPCR 1200-03-14-.03(5), the agreement letter dated October 13, 2023 (Attachment #2), and the application dated February 12, 2025

Compliance Method: Compliance with this emission limitation is assured by compliance with **Conditions E4-1 and E3-6** of this permit, and the emission factor of 57.14 pounds per million cubic feet of natural gas derived from gas quality characteristics in a current, valid purchase contract, tariff sheet or transportation contract for the gaseous fuel, specifying that the maximum total sulfur content of the fuel is 20 grains/100 scf or less (Attachment #3).

- E4-4.** Carbon Monoxide (CO) emitted from the group of three combustion turbines shall not exceed **171.27** tons during all intervals of 12 consecutive months (total for all three turbines). (Intervals of 12 consecutive months are January through the next December, February through the next January, March through the next February, etc.)

TAPCR 1200-03-06-.03(2)

Compliance Method: Compliance with this emission limitation is based on compliance with **Conditions E4-1 and E3-6** of this permit and the vendor guarantees described in the application dated February 12, 2025.

- E4-5.** Volatile organic compounds (VOC) emitted from the group of three combustion turbines shall not exceed **5.40** tons during all intervals of 12 consecutive months (total for all three turbines).

TAPCR 1200-03-06-.03(2)

Compliance Method: Compliance with this emission limitation is based on compliance with **Conditions E4-1 and E3-6** of this permit and the vendor guarantees described in the application dated February 12, 2025.

- E4-6.** Nitrogen oxides (NOx) emitted from the group of three combustion turbines shall not exceed 105.45 tons during all intervals of 12 consecutive months (total for all three turbines).

TAPCR 1200-03-06-.03(2)

Compliance Method: Compliance with this emission limitation is based on compliance with **Conditions E4-1 and E3-6** of this permit and the vendor guarantees described in the application dated February 12, 2025.

- E4-7.** One or more of the turbines or turbine components may be removed and/or replaced with repaired or refurbished equivalent capacity turbines or in-kind components in order to maintain gas delivery capacity.

TAPCR 1200-03-09-.03(8)

Compliance Method: Records shall be maintained on site of such changes and shall be entered into a log no later than a week after the unit is replaced in accordance with **Conditions B1 and E3-4** of this permit. If the replacement turbine(s) are retained on a permanent basis the permittee shall notify the Division in writing and submit an application to the Division if the unit is subject to any applicable federal requirements including MACT, NSPS etc.

- E4-8.** Portable compressor engines, such as Allison KV501, Solar Centaur or Solar Saturn, may be used on an interim basis (up to three months) to temporarily replace the existing unit (or units) under maintenance or repair.

TAPCR 1200-03-09-.03(8)

Compliance Method: Records shall be maintained on site of such changes and entered into a log within a week after the unit is put in temporary replacement for repair or maintenance and also a record must be entered no later than one week after the temporary unit is removed and the existing unit has resumed operation. Both types of log entries shall be made in accordance with **Conditions B1 and E3-4** of this permit.

E5. Emission Source 74-0064-03

74-0064-03	Source Description	One Ford C50G-6005-A Natural Gas-Fired Standby 4 Stroke Rich Burn Emergency Generator Engine [0.71 MMBTU/hr, 68 bhp] NESHAP Subpart ZZZZ
-------------------	---------------------------	---

Conditions E5-1 through E5-17 apply to source 74-0064-03

- E5-1.** The unit number, model, rated heat input rate, and power output capacity of the natural gas-fired emergency engine is shown in the table below. This condition is a statement of the rated heat input rate, and power output capacity for the engine. Should the permittee need to modify the engine in a manner that increases its rated heat input rate, and/or power output capacity, a construction permit or Title V modification shall first be applied for and received in accordance with TAPCR 1200-03-09-.01 or TAPCR 1200-03-09-.02(11)(d)1(i)(V) prior to making the change.

Unit #	Model	Rated Heat Input (HHV) (MMBtu/hr)	Rated Power Output (horsepower)
RIDG ENGEN 01	Ford C50G-6005-A	0.71	68

TAPCR 1200-03-09-.03(8) and the application dated February 12, 2025

Compliance method: The permittee shall maintain documentation to demonstrate the rated heat input rate, and power output capacity of the engine. Documentation may include, but is not limited to, purchase records, operating manuals, or a tag affixed to the unit by the manufacturer. These documents shall be kept readily available/accessible and made available upon request by the Technical Secretary or a Division representative.

- E5-2.** The permittee has designated this source as an "emergency generator." According to a memorandum dated September 6, 1995, from John Seitz, Director, Office of Air Quality Planning and Standards, "EPA believes that **500** hours is an appropriate default assumption for estimating the number of hours that an emergency generator could be expected to operate under worst-case conditions." This value will be assumed to be the maximum operating hours per 12-month period for this source for the purpose of establishing a "potential to emit" for the facility for the pollutants of concern for the engine specified in **Conditions E5-3 through E5-7** of this permit. The 500-hour value includes the **100** hours per year for maintenance checks and readiness testing as specified in **Condition E5-14B**, of this permit. In the event that the unit operates more than **500** hours per calendar year, the total annual hours of operation shall be reported to the Technical Secretary by the end of the calendar year, along with the amount of fuel used, and actual emissions from this unit.

TAPCR 1200-03-09-.03(8)

Compliance Method: Compliance shall be demonstrated by the recordkeeping required by **Condition E5-16** of this permit and by the report(s) submitted to the Technical Secretary in the event that the unit operates more than **500** hours per calendar year.

- E5-3.** Particulate matter (PM) emissions emitted from the emergency generator engine shall not exceed **0.02** pounds per hour (lbs/hr) on a daily average basis.

TAPCR 1200-03-06-.01(7), the agreement letter dated October 13, 2023 (Attachment #2), and the application dated February 12, 2025

Compliance Method: Compliance with this emission limitation is assured by compliance with **Conditions E5-1 and E3-6** of this permit and the use of emission factor of (9.50 E-03 [filterable PM] + 9.91 E-03 [condensable PM]) pounds per million Btu from Table 3.2-3 of AP-42, Chapter 3, Section 2, Emission Factors for Natural Gas-fired Reciprocating Engines, supplement to 5th Ed. dated August 2000 (Attachment #7).

- E5-4.** Sulfur dioxide (SO₂) emitted from the emergency generator engine shall not exceed **0.04** pounds per hour (lbs/hr) on a daily average basis.

TAPCR 1200-03-14-.03(5), the agreement letter dated October 13, 2023 (Attachment #2), and the application dated February 12, 2025

Compliance Method: Compliance with this emission limitation is assured by compliance with **Conditions E5-1 and E3-6** of this permit and the emission factor of 57.14 pounds per million cubic feet of natural gas derived from gas quality characteristics in a current, valid purchase contract, tariff sheet or transportation contract for the gaseous fuel, specifying that the maximum total sulfur content of the fuel is 20 grains/100 scf or less (Attachment #3).

- E5-5.** Carbon Monoxide (CO) emitted from the emergency generator engine shall not exceed **0.67** tons during all intervals of 12 consecutive months.

TAPCR 1200-03-07-.07(2)

Compliance Method: Compliance with this emission limitation is based on compliance with **Conditions E5-1 and E3-6** of this permit and the vendor guarantees described in the application dated February 12, 2025.

- E5-6.** Volatile organic compounds (VOC) emitted from the emergency generator engine shall not exceed **0.01** tons during all intervals of 12 consecutive months.

TAPCR 1200-03-07-.07(2)

Compliance Method: Compliance with this emission limitation is based on compliance with **Conditions E5-1 and E3-6** of this permit and the vendor guarantees described in the application dated February 12, 2025.

- E5-7.** Nitrogen oxides (NO_x) emitted from this source will not exceed **0.41** tons during all intervals of 12 consecutive months.

TAPCR 1200-03-07-.07(2)

Compliance Method: Compliance with this emission limitation is based on compliance with **Conditions E5-1 and E3-6** of this permit and the vendor guarantees described in the application dated February 12, 2025.

- E5-8.** The emergency engines may be removed and replaced with repaired or refurbished equivalent capacity emergency engines in order to maintain facility operation.

TAPCR 1200-03-09-.03(8)

Compliance Method: Records shall be maintained on site of such changes and shall be entered into a log no later than a week after the unit is replaced in accordance with **Conditions B1 and E3-4** of this permit. If the replacement engine(s) are retained on a permanent basis the permittee shall notify the Division in writing and submit an application to the Division if the unit is subject to any applicable federal requirements including MACT, NSPS etc.

- E5-9.** The emergency engine is subject to regulations under **40 CFR Part 63, Subpart ZZZZ, NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR STATIONARY RECIPROCATING INTERNAL COMBUSTION ENGINES** as an existing stationary Reciprocating Internal Combustion Engine (RICE) located at an area source of HAP emissions, including any and/or all applicable emission limitations, notification, compliance options, records, reports etc. as referenced below in **Conditions E5-10 through E5-17** of this permit.

40 CFR §§63.6580; 63.6585(a)&(c); 63.6590(a)(1)(iii)

Compliance Method: Compliance with **Conditions E5-10 through E5-17** of this permit is assured through the submittal of the required reports and by maintaining the records required by this permit.

- E5-10.** Pursuant to 40 CFR §63.6603(a) and 40 CFR §63.6625(h), the permittee shall comply with the following requirements specified in Table 2d to Subpart ZZZZ of Part 63:

For each . . .	The permittee must meet the following requirement, except during periods of startup . . .	During periods of startup the permittee must . . .
5. Emergency stationary SI RICE; black start stationary SI RICE; nonemergency, non-black start 4SLB stationary RICE >500 HP that operate 24 hours or less per calendar year; non-emergency, non-black start 4SRB stationary RICE >500 HP that operate 24 hours or less per calendar year. ²	a. Change oil and filter every 500 hours of operation or within 1 year + 30 days of the previous change, whichever comes first;¹; b. Inspect spark plugs every 1,000 hours of operation or within 1 year + 30 days of the previous inspection, whichever comes first, and replace as necessary; and c. Inspect all hoses and belts every 500 hours of operation or within 1 year + 30 days of the previous inspection, whichever comes first, and replace as necessary.	Minimize the engine's time spent at idle and minimize the engine's startup time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the non-startup emission limitations apply.

¹The source has the option to utilize an oil analysis program as described in **Condition E5-12** of this permit in order to extend the specified oil change requirement.

²If an emergency engine is operating during an emergency and it is not possible to shut down the engine in order to perform the management practice requirements on the schedule required, or if performing the management practice on the required schedule would otherwise pose an unacceptable risk under federal, state, or local law, the management practice can be delayed until the emergency is over or the unacceptable risk under federal, state, or local law has abated. The management practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under federal, state, or local law has abated. Sources must report any failure to perform the management practice on the schedule required and the federal, state or local law under which the risk was deemed unacceptable.

TAPCR 0400-30-38-.01(1), 40 CFR §63.6603(a), and 40 CFR §63.6625(h)

Compliance Method: The permittee shall keep records of the following: (1) the dates of oil and filter change and the hours showing on the engine's hour meter at the time of oil and filter change, (2) the dates of spark plug inspection and the hours showing on the engine's hour meter at the time of spark plug inspection, (3) the dates of hoses and belts inspection and the hours showing on the engine's hour meter at the time of hoses and belts inspection; and (4) the engine's time spent at idle and the engine's startup time at each time the engine has a startup.

- E5-11.** The permittee must install a non-resettable hour meter if one is not already installed in this existing emergency stationary RICE located at an area source of HAP emissions.

TAPCR 0400-30-38-.01(1) and 40 CFR §63.6625(f)

- E5-12.** The permittee has the option of utilizing an oil analysis program in order to extend the specified oil change requirement in **Condition E5-10** of this permit. The oil analysis must be performed at the same frequency specified for changing the oil in **Condition E5-10** of this permit. The analysis program must at a minimum analyze the following three parameters: Total Acid Number, viscosity, and percent water content. The condemning limits for these parameters are as follows:

Total Acid Number increases by more than 3.0 milligrams of potassium hydroxide (KOH) per gram from Total Acid Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the engine owner or operator is not required to change the oil.

If any of the limits are exceeded, the engine owner or operator must change the oil within 2 days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the engine owner or operator must change the oil within 2 days or before commencing operation, whichever is later.

TAPCR 0400-30-38-.01(1) and 40 CFR §63.6625(j)

Compliance Method: The owner or operator must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine.

E5-13. The permittee must demonstrate continuous compliance with **Condition E5-10** of this permit according to the following method(s) specified in Table 6 to Subpart ZZZZ of Part 63.

For each . . .	Complying with the requirement to . . .	The permittee must demonstrate continuous compliance by . . .
9. Existing emergency and black start stationary RICE $\leq$ 500 HP located at a major source of HAP, existing non-emergency stationary RICE $<$ 100 HP located at a major source of HAP, existing emergency and black start stationary RICE located at an area source of HAP, existing non-emergency stationary CI RICE $\leq$ 300 HP located at an area source of HAP, existing non-emergency 2SLB stationary RICE located at an area source of HAP, existing non-emergency stationary SI RICE located at an area source of HAP which combusts landfill or digester gas equivalent to 10 percent or more of the gross heat input on an annual basis, existing non-emergency 4SLB and 4SRB stationary RICE $\leq$ 500 HP located at an area source of HAP, existing non-emergency 4SLB and 4SRB stationary RICE $>$ 500 HP located at an area source of HAP that operate 24 hours or less per calendar year, and existing non-emergency 4SLB and 4SRB stationary RICE $>$ 500 HP located at an area source of HAP that are remote stationary RICE	a. Work or Management practices (Condition E5-10)	i. Operating and maintaining the stationary RICE according to the manufacturer's emission-related operation and maintenance instructions; or ii. Develop and follow your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.

TAPCR 0400-30-38-.01(1), 40 CFR §63.6605(b), 40 CFR §63.6625(e), and 40 CFR §63.6640(a)

Compliance Method: The permittee must keep records of the operation of the existing emergency engine and maintenance conducted on the existing emergency engine in order to demonstrate that the permittee operated and maintained the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or the maintenance plan developed by the permittee.

- (a) Records must be in a form suitable and readily available for expeditious review according to 40 CFR §63.10(b)(1).
- (b) Records must be kept for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record according to 40 CFR §63.10(b)(1).
- (c) Records must be kept readily accessible in hard copy or electronic form for at least 5 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to 40 CFR §63.10(b)(1).

TAPCR 0400-30-38-.01(1), 40 CFR § 63.10(b)(1), and 40 CFR §63.6660(a) through (c)

E5-14. The permittee must operate the emergency stationary RICE according to the requirements in paragraphs A through D of this permit condition. In order for the engine to be considered an emergency stationary RICE under 40 CFR Part 63 Subpart ZZZZ, any operation other than emergency operation, and operation in non-emergency situations for 50 hours per year, as described in paragraphs A through D of this permit condition, is prohibited. If the permittee does not operate the engine according to the requirements in paragraphs A through D of this permit condition, the engine will not be considered an emergency engine under 40 CFR Part 63 Subpart ZZZZ and must meet all requirements for non-emergency engines.

- A. There is no time limit on the use of emergency stationary RICE in emergency situations.
- B. The permittee may operate the emergency stationary RICE for any combination of the purposes specified in paragraph 1 below for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by paragraphs C and D below counts as part of the 100 hours per calendar year allowed by this paragraph.
 - 1. Emergency stationary RICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency RICE beyond 100 hours per calendar year.
 - 2. [Reserved – Vacated and Remanded on 05/01/2015]
 - 3. [Reserved – Vacated and Remanded on 05/01/2015]
- C. [Reserved - Not Applicable]

- D. Emergency stationary RICE located at area sources of HAP may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing provided in paragraph B of this condition. The 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

TAPCR 0400-30-38-.01(1), 40 CFR §63.6640(f)

Compliance Method: Compliance with this condition may be demonstrated by the recordkeeping required by **Condition E5-16** of this permit.

- E5-15.** The permittee must keep records of the maintenance conducted on the stationary RICE in order to demonstrate that the permittee operated and maintained the stationary RICE and after-treatment control device (if any) according to the permittee's own maintenance plan.

TAPCR 0400-30-38-.01(1) and 40 CFR §63.6655(e)(2)

- E5-16.** The permittee must keep records of the hours of operation of the engine in emergency and non-emergency service that are recorded through the non-resettable hour meter. The permittee must document how many hours for each engine are spent for emergency operation, including what classified the operation as emergency and how many hours for each engine are spent for non-emergency operation.

TAPCR 0400-30-38-.01(1) and 40 CFR §63.6655(f)

Compliance Method: The permittee shall maintain a monthly log of operating hours for each engine. The permittee shall maintain the following log formats or alternative formats which readily provide the same required information.

Year:				
Month	Non-Emergency Operation Hours		Emergency Operation Hours	Comments*
	Maintenance Checks and Readiness Testing	Other Non-Emergency Operation		
January				
February				
March				
April				
May				
June				
July				
August				
September				
October				
November				
December				
Subtotal 1				Add the numbers in each column
Subtotal 2				Non-emergency and Emergency Subtotals
TOTAL				Total Hours of operation for the engine

*The permittee must document the number of hours spent for emergency operation including what classified the operation as emergency and the number of hours spent for non-emergency operation.

E5-17. The permittee must report each instance in which the permittee did not meet the requirements in Table 8 to 40 CFR Part 63 Subpart ZZZZ that apply to the permittee.

TAPCR 0400-30-38-.01(1) and 40 CFR §63.6640(e)

Compliance Method: The permittee must submit semiannual reports according to the requirements in paragraphs (a) through (c) below:

- (a) The first report shall cover the 6-month period from July 1, 2024, to December 31, 2024, and shall be submitted within 60 days after the 6-month period ending December 31, 2024. Subsequent reports shall be submitted within 60 days after the end of each 6-month period following the first report.
- (b) The reports must contain the following information:
 - 1. Company name and address where the engine is located.
 - 2. Date of the report and beginning and ending dates of the reporting period.
 - 3. Engine site rating and model year.
 - 4. Latitude and longitude of the engine in decimal degrees reported to the fifth decimal place.
 - 5. If there were no deviations from the requirements in Table 8 to 40 CFR Part 63 Subpart ZZZZ that apply to the permittee, a statement that there were no deviations from the requirements in Table 8 to 40 CFR Part 63 Subpart ZZZZ during the reporting period.
 - 6. If there were deviations from the requirements in Table 8 to 40 CFR Part 63 Subpart ZZZZ that apply to the permittee, information on the number, duration, and cause of deviations, and the corrective action taken.
- (c) These NESHAP 40 CFR 63, Subpart ZZZZ (MACT) reports shall be submitted as specified in **Condition E2(c)** of this permit.

END OF PERMIT NUMBER 583429

ATTACHMENT #1

Title V Fee Selection Form APC 36 (CN-1583) (Rev. 4-19)

PROPOSED



TITLE V FEE SELECTION

Type or print and submit to the email address above.			
FACILITY INFORMATION			
1. Organization's legal name and SOS control number [as registered with the TN Secretary of State (SOS)]			
2. Site name (if different from legal name)			
3. Site address (St./Rd./Hwy.)			County name
City			Zip code
4. Emission source reference number		5. Title V permit number	
FEE SELECTION			
This fee selection is effective beginning January 1, _____. When approved, this selection will be effective until a new Fee Selection form is submitted. Fee Selection forms must be submitted on or before December 31 of the annual accounting period.			
6. Payment Schedule (choose one):			
Calendar Year Basis (January 1 – December 31) ☐		Fiscal Year Basis (July 1 – June 30) ☐	
7. Payment Basis (choose one):			
Actual Emissions Basis ☐ Allowable Emissions Basis ☐ Combination of Actual and Allowable Emissions Basis ☐			
8. If Payment Basis is "Actual Emissions" or "Combination of Actual and Allowable Emissions", complete the following table for each permitted source and each pollutant for which fees are due for that source. See instructions for further details.			
Source ID	Pollutant	Allowable or Actual Emissions	If allowable emissions: Specify condition number and limit. If actual emissions: Describe calculation method and provide example. Provide condition number that specifies method, if applicable.

8. (Continued)

Source ID	Pollutant	Allowable or Actual Emissions	If allowable emissions: Specify condition number and limit.
			If actual emissions: Describe calculation method and provide example. Provide condition number that specifies method, if applicable.

CONTACT INFORMATION (BILLING)

9. Billing contact			Phone number with area code
Mailing address (St./Rd./Hwy.)			Fax number with area code
City	State	Zip code	Email address

SIGNATURE BY RESPONSIBLE OFFICIAL

Based upon information and belief formed after reasonable inquiry, I, as the responsible person of the above mentioned facility, certify that the information contained in the submittal is accurate and true to the best of my knowledge. As specified in TCA Section 39-16-702(a)(4), this declaration is made under penalty of perjury.

10. Signature		Date
Signer's name (type or print)	Title	Phone number with area code

ATTACHMENT #2

Agreement Letter dated October 13, 2023

PROPOSED



Enbridge
915 N. Eldridge Parkway,
Suite 1100
Houston, TX 77079

October 13, 2023

Tennessee Department of Environment and Conservation
Division of Air Pollution Control
William R. Snodgrass Tennessee Tower, 15th Floor
312 Rosa L. Parks Avenue
Nashville, TN 37243

RE: Permit Agreement Letter
East Tennessee Natural Gas - Station 3101 - Ridgeway
6859 Hall Road, Greenbrier, TN, 27073
Emission Source Reference No. 74-0064-01, -03/Permit No. 981635

Dear Technical Secretary:

On behalf of East Tennessee Natural Gas, LLC - Station 3101 (ETNG), the following limitations are agreed upon for the above referenced facility:

1. Use only natural gas as a fuel for the sources in the permit. To demonstrate compliance, the Facility will maintain documentation to demonstrate the type(s) of fuel used by the sources. Documentation shall include, but is not limited to, a current, valid purchase contract, tariff sheet or transportation contract for the natural gas, specifying that the maximum total sulfur content of the natural gas is 20 grains/100 scf or less, manufacturer's specifications, purchase records, operating manuals, or a tag affixed to the unit by the manufacturer. These documents shall be kept readily available/accessible and made available upon request by the Technical Secretary or a Division representative.
2. Limit emissions of particulate matter from the group of three combustion turbines to no more than 0.33 pounds per hour (lbs/hr) on a daily average basis (total for all three turbines). Compliance with this emission limitation is assured by the combustion turbine heat input rating, the use of natural gas as fuel, and the emission factor of 6.60 E-03 pounds per million Btu from Table 3.1-2a of AP-42, Chapter 3, Section 1, Stationary Gas Turbines, supplement to 5th Ed. dated 4/00.
3. Limit emissions of sulfur dioxide from the group of three combustion turbines to no more than 2.76 pounds per hour (lbs/hr) on a daily average basis (total for all three turbines). Compliance with this emission limitation is assured by the combustion turbines heat input rating, the use of natural gas as fuel, and the emission factor of 57.14 pounds per million cubic feet of natural gas derived from gas quality characteristics in a current, valid purchase contract, tariff sheet or transportation contract for the gaseous fuel, specifying that the maximum total sulfur content of the fuel is 20 grains/100 scf or less.
4. Limit emissions of particulate matter from the emergency generator to no more than 0.02 pounds per hour (lbs/hr) on a daily average basis. Compliance with this emission limitation is assured by the emergency generator heat input rating, the use of natural gas as fuel, and the emission factor of (9.50 E-03 [filterable PM] + 9.91 E-03 [condensable PM]) pounds per million Btu from Table 3.2-3 of AP-42, Chapter 3, Section 2, Emission Factors for Natural Gas-fired Reciprocating Engines, supplement to 5th Ed. dated August 2000.
5. Limit emissions of sulfur dioxide from the emergency generator to no more than 0.04 pounds per hour (lbs/hr) on a daily average basis. Compliance with this emission limitation is assured by the emergency generator heat input rating, the use of natural gas as fuel, and the emission factor of 57.14 pounds per million cubic feet of natural gas derived from gas quality characteristics in a current, valid purchase contract, tariff sheet or transportation contract for the gaseous fuel, specifying that the maximum total sulfur content of the fuel is 20 grains/100 scf or less.

Should you have any questions or require additional information, please contact Chuck Zukor via phone at 713-627-5791 or via e-mail at Chuck.Zukor@enbridge.com.

On behalf of ETNG, I agree to the above limitations. I am authorized to represent and bind the facility in environmental affairs.

Sincerely,

EAST TENNESSEE NATURAL GAS, LLC



Stephen McFadden
Director, Field Operations Central Region

Date 10-13-23

ATTACHMENT #3

FERC NGA GAS TARIFF EXCERPT

PROPOSED

East Tennessee Database 1

Program:	NGA Gas	Company Name:	East Tennessee Natural Gas, LLC
Filing Category:	Normal	Filing Date:	01/31/2023
FERC Docket:	RP23-00385-000	FERC Action:	Accept
FERC Order:	Delegated Letter Order	Order Date:	03/03/2023
Effective Date:	08/01/2023	Current Status:	Effective
Assoc. Filing Num		Option Code:	A
Section Title:	Tariff, Fourth Revised Volume No. 1 (3.0.0)		

FERC GAS TARIFF
FOURTH REVISED VOLUME NO. 1
(Supersedes Third Revised Volume No. 1)
OF
EAST TENNESSEE NATURAL GAS, LLC
FILED WITH THE
FEDERAL ENERGY REGULATORY COMMISSION

COMMUNICATIONS CONCERNING THIS TARIFF

SHOULD BE SENT TO:

ESTELA D. LOZANO
DIRECTOR, REGULATORY
EAST TENNESSEE NATURAL GAS, LLC

Mailing Address: Post Office Box 1642
Houston, Texas 77251-1642

Street Address: 915 N. Eldridge Parkway, Suite 1100

Houston, Texas 77079

Telephone Number: (713) 627-4522

Facsimile Number: (713) 627-5947

East Tennessee Database 1

Program:	NGA Gas	Company Name:	East Tennessee Natural Gas, LLC
Filing Category:	Refiled	Filing Date:	08/25/2010
FERC Docket:	RP10-01097-000	FERC Action:	Accept
FERC Order:	Delegated	Order Date:	09/29/2010
Effective Date:	08/25/2010	Current Status:	Effective
Assoc. Filing Num		Option Code:	A
Section Title:	2., Quality (0.0.0)		

2. QUALITY

2.1 The provisions set forth in this Section 2 shall apply to all gas received by Transporter under this Tariff.

- (a) The natural gas shall have a Total Heating Value of not less than 967 British thermal units per Cubic Foot (Btu/cf) and not greater than 1110 Btu/cf of gas volume (measured on a dry basis). The gas shall have a Wobbe Number of not less than 1298 nor greater than 1400 (calculated using Total Heating Value (THV)), dry, under standard conditions at 14.73 psia at 60 degrees Fahrenheit based on the following mathematical definition and in accordance with Section 3 of these GT&C:

$$\text{THV} / \text{Sqrt SG}_{\text{gas}}$$

Where: THV = Total Heating Value (Btu/scf),
 SG_{gas} = Specific Gravity, and
 Sqrt = Square root of.

Shipper may subject, or permit the subjection of, the natural gas to compression, cooling, cleaning and other processes and helium, natural gasoline, butane, propane, and any other hydrocarbons except methane may be removed prior to delivery to Transporter. In the event that the Total Heating Value of gas, per Cubic Foot, when determined as provided in Section 3.2 hereof, and subject to Section 2.4, falls below 967 Btu/cf, or is above 1110 Btu/cf, Transporter shall have the option to refuse to accept said gas so long as said Total Heating Value remains below 967 Btu/cf or above 1110 Btu/cf, respectively.

- (b) All gas shall be commercially free (at prevailing pressure and temperature in Transporter's pipeline) from objectionable odors, dust, hydrocarbon liquids, water or other solid or liquid matters that might interfere with its merchantability or cause injury to persons or properties or interference with proper operation of the lines, regulators, meters or other appliances through which it flows and which might become separated from the gas in Transporter's facilities, and Transporter may require furnishing,

installation, maintenance and operation of such drips, separators, heaters and other mechanical devices as may be necessary to effect compliance with such requirements (the installation of such equipment shall be subject to prior approval of Transporter as to the design and construction of such facilities, which approval shall not be unreasonably withheld).

- (c) All gas shall contain no more than twenty (20) grains of total sulphur, nor more than one fourth (1/4) of one grain of hydrogen sulphide per one hundred (100) Cubic Feet as determined by methods to be mutually agreed upon.
- (d) All gas shall not exceed one-tenth of one percent (0.1%) by volume of oxygen.
- (e) All gas shall not contain more than four percent (4%) by volume of a combined total of carbon dioxide and nitrogen components; provided, however, that the total carbon dioxide content shall not exceed three percent (3%) by volume nor shall the total nitrogen content exceed three percent (3%) by volume.
- (f) All gas shall have a temperature of not more than one hundred degrees (100°) Fahrenheit.
- (g) All gas shall have been dehydrated by Shipper for removal of entrained water present therein in a vapor state, and in no event contain more than seven (7) pounds of entrained water per million Cubic Feet, at a pressure base of fourteen and seventy three hundredths (14.73) pounds per square inch and a temperature of sixty degrees (60°) Fahrenheit as determined by dew-point apparatus approved by the Bureau of Mines or such other apparatus as may be mutually agreed upon.
- (h) All gas shall contain not more than 0.05 gallons per thousand cubic feet ("GPM") of C6+ hydrocarbons at any operating pressure.
- (i) All gas shall not contain, either in the gas or in any liquids with the gas, any microbiological organism, gum, gum-causing constituents, active bacteria or bacterial agent capable of contributing to or causing corrosion and/or operational and/or other problems. Microbiological organisms, bacteria or bacterial agents include, but are not limited to, sulfate reducing bacteria (SRB) and acid producing bacteria (APB). Tests for bacteria or bacterial agents shall be conducted on samples taken from the meter run or the appurtenant piping using American Petroleum Institute (API) test method API-RP38 or any other test method acceptable to Transporter and Shipper which is currently available or may become available at any time.

2.2 The design and construction of any facilities to be installed by Shipper in order to

comply with the quality specifications in Section 2.1 shall be approved by Transporter prior to such facilities being placed in service.

- 2.3 Tests to determine sulphur, hydrogen sulphide, oxygen, carbon dioxide and nitrogen content shall be made by approved standard methods in general use in the gas industry.
- 2.4 Failure to conform to specifications: If the gas offered for transportation to Transporter shall fail at any time to conform to any of the specifications set forth in Section 2.1, then Transporter shall notify Shipper and thereupon may, at Transporter's option, refuse to accept such gas pending correction by Shipper. Upon Shipper's failure to promptly remedy any deficiency in quality as specified in Section 2.1, Transporter may receive such gas and may make changes necessary to bring such gas into conformity with such specifications, and Shipper shall reimburse Transporter for any reasonable expense incurred by Transporter in effecting such changes.
- 2.5 Notwithstanding the exercise by Transporter of the options in Section 2 above, Shipper shall use its best efforts to correct any quality deficiency in the gas tendered for transportation. Further, notwithstanding Transporter's election under Section 2 above, Shipper shall reimburse Transporter for all expenses incurred in repairing injuries to Transporter's facilities resulting from deliveries of gas that do not conform to the quality specifications set forth in Section 2.1.
- 2.6 Transporter shall have the right to collect from all Shippers delivering gas to Transporter at a common Receipt Point their pro rata share of the cost of any additional gas analysis and quality control equipment that Transporter, at its reasonable discretion, determines is required to be installed at such Receipt Point to monitor the quality of gas delivered. With respect to Shippers subject to Rate Schedules IT, IT-L, FT-A, FT-L, and/or FT-GS, the collection shall be by means of an Incidental Charge.
- 2.7 Separation, Dehydration and Processing: If Shipper's gas at a receipt point does not conform to both Section 2.1(a) and (h), Transporter at its reasonable discretion may require that some or all of the gas to be transported be processed to remove liquid and liquefiable hydrocarbons prior to delivery to Transporter or may require evidence that satisfactory arrangements have been made for the removal of liquid and liquefiable hydrocarbons at a separation and dehydration and/or processing plant on Transporter's system. In the event Transporter agrees that separation and dehydration and/or processing will occur after delivery of transportation gas to Transporter, Transporter and Shipper shall determine a mutually agreeable charge for the transportation of liquid and liquefiable hydrocarbons.
- 2.8 Waiver of requirements: Transporter may waive the requirements set forth in this Section 2 in order to allow Shipper to tender or cause to be tendered gas which

does not, when injected into Transporter's pipeline, meet the quality specifications set forth in Section 2; provided that acceptance of such gas shall not adversely affect Transporter's system facilities or operations, and further provided that once such gas has been blended, to the extent blending occurs, the commingled gas stream at any delivery point on Transporter's system shall meet the quality specifications set forth in Section 2. Transporter shall post on LINK® any waiver of Transporter's gas quality requirements. Transporter shall implement this Section 2.8 on a non-discriminatory basis and may cancel any waiver at any time if necessary to assure that the commingled gas stream shall not adversely affect system facilities or operations.

ATTACHMENT #4

General Provisions for sources subject to 40 CFR Part 63 Subpart ZZZZ

PROPOSED

General provisions citation	Subject of citation	Applies to subpart	Explanation
§63.1	General applicability of the General Provisions	Yes.	
§63.2	Definitions	Yes	Additional terms defined in §63.6675.
§63.3	Units and abbreviations	Yes.	
§63.4	Prohibited activities and circumvention	Yes.	
§63.5	Construction and reconstruction	Yes.	
§63.6(a)	Applicability	Yes.	
§63.6(b)(1)–(4)	Compliance dates for new and reconstructed sources	Yes.	
§63.6(b)(5)	Notification	Yes.	
§63.6(b)(6)	[Reserved]		
§63.6(b)(7)	Compliance dates for new and reconstructed area sources that become major sources	Yes.	
§63.6(c)(1)–(2)	Compliance dates for existing sources	Yes.	
§63.6(c)(3)–(4)	[Reserved]		
§63.6(c)(5)	Compliance dates for existing area sources that become major sources	Yes.	
§63.6(d)	[Reserved]		
§63.6(e)	Operation and maintenance	No.	
§63.6(f)(1)	Applicability of standards	No.	
§63.6(f)(2)	Methods for determining compliance	Yes.	
§63.6(f)(3)	Finding of compliance	Yes.	
§63.6(g)(1)–(3)	Use of alternate standard	Yes.	
§63.6(h)	Opacity and visible emission standards	No	Subpart ZZZZ does not contain opacity or visible emission standards.
§63.6(i)	Compliance extension procedures and criteria	Yes.	
§63.6(j)	Presidential compliance exemption	Yes.	
§63.7(a)(1)–(2)	Performance test dates	Yes	Subpart ZZZZ contains performance test dates at §§63.6610, 63.6611, and 63.6612.
§63.7(a)(3)	CAA section 114 authority	Yes.	
§63.7(b)(1)	Notification of performance test	Yes	Except that §63.7(b)(1) only applies as specified in §63.6645.
§63.7(b)(2)	Notification of rescheduling	Yes	Except that §63.7(b)(2) only applies as specified in §63.6645.
§63.7(c)	Quality assurance/test plan	Yes	Except that §63.7(c) only applies as specified in §63.6645.
§63.7(d)	Testing facilities	Yes.	
§63.7(e)(1)	Conditions for conducting performance tests	No.	Subpart ZZZZ specifies conditions for conducting performance tests at §63.6620.
§63.7(e)(2)	Conduct of performance tests and reduction of data	Yes	Subpart ZZZZ specifies test methods at §63.6620.
§63.7(e)(3)	Test run duration	Yes.	

General provisions citation	Subject of citation	Applies to subpart	Explanation
§63.7(e)(4)	Administrator may require other testing under section 114 of the CAA	Yes.	
§63.7(f)	Alternative test method provisions	Yes.	
§63.7(g)	Performance test data analysis, recordkeeping, and reporting	Yes.	
§63.7(h)	Waiver of tests	Yes.	
§63.8(a)(1)	Applicability of monitoring requirements	Yes	Subpart ZZZZ contains specific requirements for monitoring at §63.6625.
§63.8(a)(2)	Performance specifications	Yes.	
§63.8(a)(3)	[Reserved]		
§63.8(a)(4)	Monitoring for control devices	No.	
§63.8(b)(1)	Monitoring	Yes.	
§63.8(b)(2)–(3)	Multiple effluents and multiple monitoring systems	Yes.	
§63.8(c)(1)	Monitoring system operation and maintenance	Yes.	
§63.8(c)(1)(i)	Routine and predictable SSM	Yes.	
§63.8(c)(1)(ii)	SSM not in Startup Shutdown Malfunction Plan	Yes.	
§63.8(c)(1)(iii)	Compliance with operation and maintenance requirements	Yes.	
§63.8(c)(2)–(3)	Monitoring system installation	Yes.	
§63.8(c)(4)	Continuous monitoring system (CMS) requirements	Yes	Except that subpart ZZZZ does not require Continuous Opacity Monitoring System (COMS).
§63.8(c)(5)	COMS minimum procedures	No	Subpart ZZZZ does not require COMS.
§63.8(c)(6)–(8)	CMS requirements	Yes	Except that subpart ZZZZ does not require COMS.
§63.8(d)	CMS quality control	Yes.	
§63.8(e)	CMS performance evaluation	Yes	Except for §63.8(e)(5)(ii), which applies to COMS.
			Except that §63.8(e) only applies as specified in §63.6645.
§63.8(f)(1)–(5)	Alternative monitoring method	Yes	Except that §63.8(f)(4) only applies as specified in §63.6645.
§63.8(f)(6)	Alternative to relative accuracy test	Yes	Except that §63.8(f)(6) only applies as specified in §63.6645.
§63.8(g)	Data reduction	Yes	Except that provisions for COMS are not applicable. Averaging periods for demonstrating compliance are specified at §§63.6635 and 63.6640.
§63.9(a)	Applicability and State delegation of notification requirements	Yes.	
§63.9(b)(1)–(5)	Initial notifications	Yes	Except that §63.9(b)(3) is reserved.
			Except that §63.9(b) only applies as specified in §63.6645.

General provisions citation	Subject of citation	Applies to subpart	Explanation
§63.9(c)	Request for compliance extension	Yes	Except that §63.9(c) only applies as specified in §63.6645.
§63.9(d)	Notification of special compliance requirements for new sources	Yes	Except that §63.9(d) only applies as specified in §63.6645.
§63.9(e)	Notification of performance test	Yes	Except that §63.9(e) only applies as specified in §63.6645.
§63.9(f)	Notification of visible emission (VE)/opacity test	No	Subpart ZZZZ does not contain opacity or VE standards.
§63.9(g)(1)	Notification of performance evaluation	Yes	Except that §63.9(g) only applies as specified in §63.6645.
§63.9(g)(2)	Notification of use of COMS data	No	Subpart ZZZZ does not contain opacity or VE standards.
§63.9(g)(3)	Notification that criterion for alternative to RATA is exceeded	Yes	If alternative is in use.
			Except that §63.9(g) only applies as specified in §63.6645.
§63.9(h)(1)–(6)	Notification of compliance status	Yes	Except that notifications for sources using a CEMS are due 30 days after completion of performance evaluations. §63.9(h)(4) is reserved.
			Except that §63.9(h) only applies as specified in §63.6645.
§63.9(i)	Adjustment of submittal deadlines	Yes.	
§63.9(j)	Change in previous information	Yes.	
§63.10(a)	Administrative provisions for recordkeeping/reporting	Yes.	
§63.10(b)(1)	Record retention	Yes.	
§63.10(b)(2)(i)–(v)	Records related to SSM	No.	
§63.10(b)(2)(vi)–(xi)	Records	Yes.	
§63.10(b)(2)(xii)	Record when under waiver	Yes.	
§63.10(b)(2)(xiii)	Records when using alternative to RATA	Yes	For CO standard if using RATA alternative.
§63.10(b)(2)(xiv)	Records of supporting documentation	Yes.	
§63.10(b)(3)	Records of applicability determination	Yes.	
§63.10(c)	Additional records for sources using CEMS	Yes	Except that §63.10(c)(2)–(4) and (9) are reserved.
§63.10(d)(1)	General reporting requirements	Yes.	
§63.10(d)(2)	Report of performance test results	Yes.	
§63.10(d)(3)	Reporting opacity or VE observations	No	Subpart ZZZZ does not contain opacity or VE standards.
§63.10(d)(4)	Progress reports	Yes.	
§63.10(d)(5)	Startup, shutdown, and malfunction reports	No.	
§63.10(e)(1) and (2)(i)	Additional CMS Reports	Yes.	

General provisions citation	Subject of citation	Applies to subpart	Explanation
§63.10(e)(2)(ii)	COMS-related report	No	Subpart ZZZZ does not require COMS.
§63.10(e)(3)	Excess emission and parameter exceedances reports	Yes.	Except that §63.10(e)(3)(i) (C) is reserved.
§63.10(e)(4)	Reporting COMS data	No	Subpart ZZZZ does not require COMS.
§63.10(f)	Waiver for recordkeeping/reporting	Yes.	
§63.11	Flares	No.	
§63.12	State authority and delegations	Yes.	
§63.13	Addresses	Yes.	
§63.14	Incorporation by reference	Yes.	
§63.15	Availability of information	Yes.	

ATTACHMENT #5

Opacity Matrix Decision Tree for Visible Emission Evaluation
EPA Method 9, dated June 18, 1996 (amended September 22, 2013)

PROPOSED

Decision Tree PM for Opacity for Sources Utilizing EPA Method 9*

Notes:

PM = Periodic Monitoring required by 1200-03-09-.02(11)(c)(iii).

This Decision Tree outlines the criteria by which major sources can meet the periodic monitoring and testing requirements of Title V for demonstrating compliance with the visible emission standards set forth in the permit. It is not intended to determine compliance requirements for EPA's Compliance Assurance Monitoring (CAM) Rule (formerly referred to as Enhanced Monitoring – Proposed 40 CFR 64).

Examine each emission unit using this Decision Tree to determine the PM required.*

Use of continuous emission monitoring systems eliminates the need to do any additional periodic monitoring.

Visible Emission Evaluations (VEEs) are to be conducted utilizing EPA Method 9. The observer must be properly certified to conduct valid evaluations.

Typical Pollutants
Particulates, VOC, CO, SO₂, NO_x, HCl, HF, HBr, Ammonia, and Methane.

Initial observations are to be repeated within 90 days of startup of a modified source, if a new construction permit is issued for modification of the source.

A VEE conducted by TAPCD personnel after the Title V permit is issued will also constitute an initial reading.

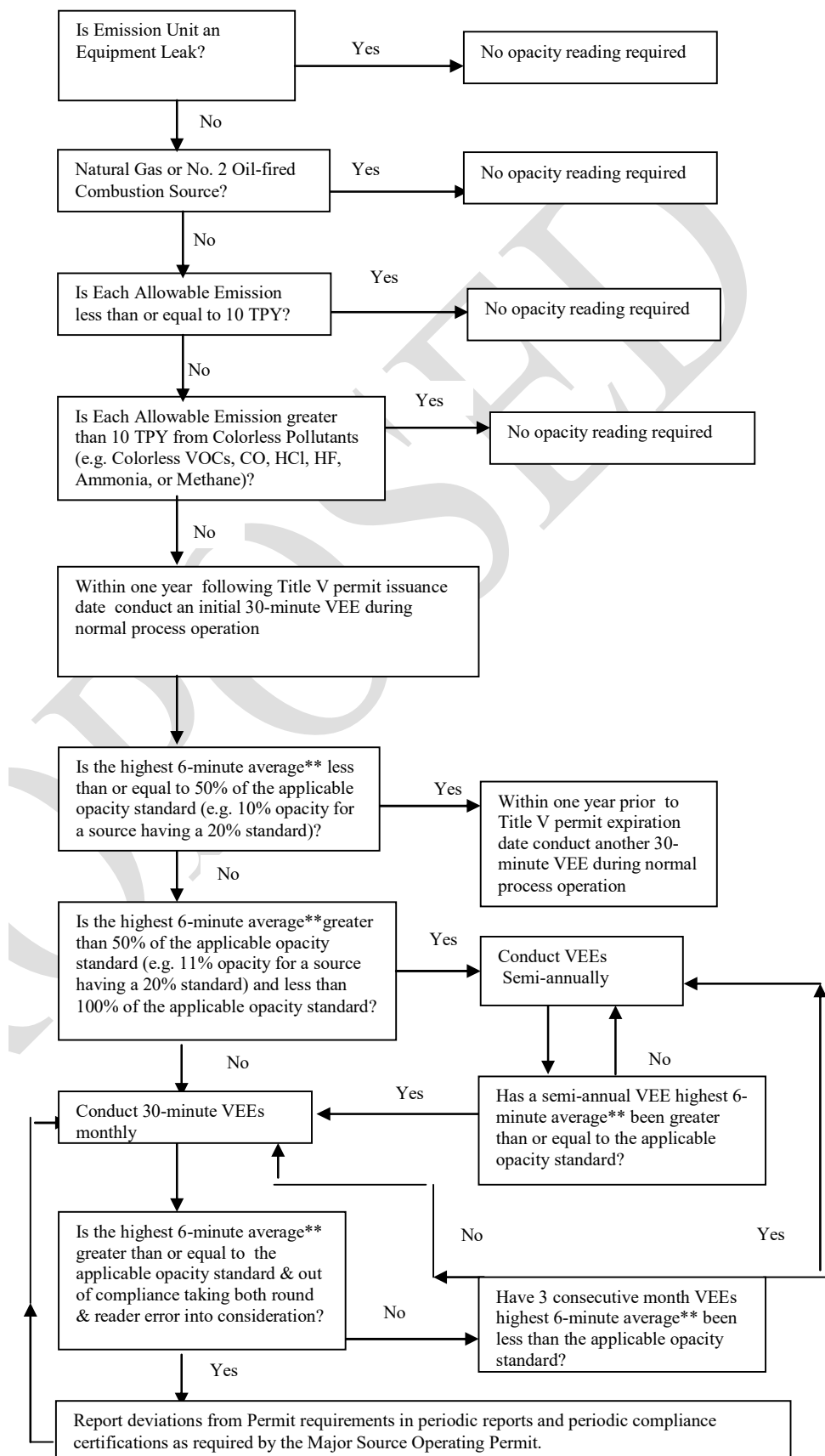
Reader Error
EPA Method 9, Non-NSPS or NESHAPS stipulated opacity standards:
The TAPCD guidance is to declare non-compliance when the highest six-minute average** exceeds the standard plus 6.8% opacity (e.g. 26.8% for a 20% standard).

EPA Method 9, NSPS or NESHAPS stipulate opacity standards:
EPA guidance is to allow only engineering round. No allowance for reader error is given.

*Not applicable to Asbestos manufacturing subject to 40 CFR 61.142

**Or second highest six-minute average, if the source has an exemption period stipulated in either the regulations or in the permit.

Dated June 18, 1996
Amended September 11, 2013



ATTACHMENT #6

EPA AP-42 FIFTH EDITION, VOLUME I
CHAPTER 3: STATIONARY INTERNAL COMBUSTION SOURCES
STATIONARY GAS TURBINES
UNCONTROLLED EMISSION FACTORS FOR STATIONARY GAS TURBINES
Revised April 2000
Table 3.1-2a

PROPOSED

Table 3.1-2a. EMISSION FACTORS FOR CRITERIA POLLUTANTS AND GREENHOUSE GASES FROM STATIONARY GAS TURBINES
(revised 4/00)

Emission Factors ^a - Uncontrolled				
Pollutant	Natural Gas-Fired Turbines ^b		Distillate Oil-Fired Turbines ^d	
	(lb/MMBtu) ^c (Fuel Input)	Emission Factor Rating	(lb/MMBtu) ^c (Fuel Input)	Emission Factor Rating
CO ₂ ^f	110	A	157	A
N ₂ O	0.003 ^g	E	ND	NA
Lead	ND	NA	1.4 E-05	C
SO ₂	0.94S ^h	B	1.01S ^h	B
Methane	8.6 E-03	C	ND	NA
VOC	2.1 E-03	D	4.1 E-04 ⁱ	E
TOC ^k	1.1 E-02	B	4.0 E-03 ^l	C
PM (condensable)	4.7 E-03 ^l	C	7.2 E-03 ^l	C
PM (filterable)	1.9 E-03 ^l	C	4.3 E-03 ^l	C
PM (total)	6.6 E-03 ^l	C	1.2 E-02 ^l	C

^a Factors are derived from units operating at high loads (≥ 80 percent load) only. For information on units operating at other loads, consult the background report for this chapter (Reference 16), available at "www.epa.gov/ttn/chief". ND = No Data, NA = Not Applicable.

^b SCCs for natural gas-fired turbines include 2-01-002-01, 2-02-002-01 & -03, and 2-03-002-02 & -03.

^c Emission factors based on an average natural gas heating value (HHV) of 1020 Btu/scf at 60°F. To convert from (lb/MMBtu) to (lb/10⁶ scf), multiply by 1020. Similarly, these emission factors can be converted to other natural gas heating values.

^d SCCs for distillate oil-fired turbines are 2-01-001-01, 2-02-001-01, 2-02-001-03, and 2-03-001-02.

^e Emission factors based on an average distillate oil heating value of 139 MMBtu/10³ gallons. To convert from (lb/MMBtu) to (lb/10³ gallons), multiply by 139.

^f Based on 99.5% conversion of fuel carbon to CO₂ for natural gas and 99% conversion of fuel carbon to CO₂ for distillate oil. CO₂ (Natural Gas) [lb/MMBtu] = (0.0036 scf/Btu)(%CON)(C)(D), where %CON = weight percent conversion of fuel carbon to CO₂, C = carbon content of fuel by weight, and D = density of fuel. For natural gas, C is assumed at 75%, and D is assumed at 4.1 E+04 lb/10⁶ scf. For distillate oil, CO₂ (Distillate Oil) [lb/MMBtu] = (26.4 gal/MMBtu) (%CON)(C)(D), where C is assumed at 87%, and the D is assumed at 6.9 lb/gallon.

^g Emission factor is carried over from the previous revision to AP-42 (Supplement B, October 1996) and is based on limited source tests on a single turbine with water-steam injection (Reference 5).

^h All sulfur in the fuel is assumed to be converted to SO₂. S = percent sulfur in fuel. Example, if sulfur content in the fuel is 3.4 percent, then S = 3.4. If S is not available, use 3.4 E-03 lb/MMBtu for natural gas turbines, and 3.3 E-02 lb/MMBtu for distillate oil turbines (the equations are more accurate).

^j VOC emissions are assumed equal to the sum of organic emissions.

^k Pollutant referenced as THC in the gathered emission tests. It is assumed as TOC, because it is based on EPA Test Method 25A.

^l Emission factors are based on combustion turbines using water-steam injection.

ATTACHMENT #7

EPA AP-42, FIFTH EDITION, VOLUME I
CHAPTER 3: STATIONARY INTERNAL COMBUSTION SOURCES
NATURAL GAS-FIRED RECIPROCATING ENGINES
UNCONTROLLED EMISSION FACTORS FOR
4-STROKE RICH-BURN ENGINES

Dated October 2024

Table 3.2-3

PROPOSED

Table 3.2-3. UNCONTROLLED EMISSION FACTORS FOR 4-STROKE RICH-BURN ENGINES^a (SCC 2-02-002-53)

Pollutant	Emission Factor (lb/MMBtu) ^b (fuel input)	Emission Factor Rating
Criteria Pollutants and Greenhouse Gases		
NO _x ^c 90 - 105% Load	2.21 E+00	A
NO _x ^c <90% Load	2.27 E+00	C
CO ^c 90 - 105% Load	3.72 E+00	A
CO ^c <90% Load	3.51 E+00	C
CO ₂ ^d	1.10 E+02	A
SO ₂ ^e	5.88 E-04	A
TOC ^f	3.58 E-01	C
Methane ^g	2.30 E-01	C
VOC ^h	2.96 E-02	C
PM10 (filterable) ^j	9.50 E-03	E
PM2.5 (filterable) ^j	9.50 E-03	E
PM Condensable ^k	9.91 E-03	E
Trace Organic Compounds		
1,1,2,2-Tetrachloroethane ^l	2.53 E-05	C
1,1,2-Trichloroethane ^l	<1.53 E-05	E
1,1-Dichloroethane	<1.13 E-05	E
1,2-Dichloroethane	<1.13 E-05	E
1,2-Dichloropropane	<1.30 E-05	E
1,3-Butadiene ^l	6.63 E-04	D
1,3-Dichloropropene ^l	<1.27 E-05	E
Acetaldehyde ^{l,m}	2.79 E-03	C
Acrolein ^{l,m}	2.63 E-03	C
Benzene ^l	1.58 E-03	B
Butyr/isobutyraldehyde	4.86 E-05	D
Carbon Tetrachloride ^l	<1.77 E-05	E

Table 3.2-3. UNCONTROLLED EMISSION FACTORS FOR 4-STROKE RICH-BURN ENGINES
(Concluded)

Pollutant	Emission Factor (lb/MMBtu) ^b (fuel input)	Emission Factor Rating
Chlorobenzene ⁱ	<1.29 E-05	E
Chloroform ⁱ	<1.37 E-05	E
Ethane ⁿ	7.04 E-02	C
Ethylbenzene ⁱ	<2.48 E-05	E
Ethylene Dibromide ⁱ	<2.13 E-05	E
Formaldehyde ^{1m}	2.05 E-02	A
Methanol	3.06 E-03	D
Methylene Chloride ⁱ	4.12 E-05	C
Naphthalene ⁱ	<9.71 E-05	E
PAH ⁱ	1.41 E-04	D
Styrene ⁱ	<1.19 E-05	E
Toluene ⁱ	5.58 E-04	A
Vinyl Chloride ⁱ	<7.18 E-06	E
Xylene ⁱ	1.95 E-04	A

^a Reference 7. Factors represent uncontrolled levels. For NO_x, CO, and PM-10, "uncontrolled" means no combustion or add-on controls; however, the factor may include turbocharged units. For all other pollutants, "uncontrolled" means no oxidation control; the data set may include units with control techniques used for NO_x control, such as PCC and SCR for lean burn engines, and PSC for rich burn engines. Factors are based on large population of engines. Factors are for engines at all loads, except as indicated. SCC = Source Classification Code. TOC = Total Organic Compounds. PM10 = Particulate Matter ≤ 10 microns (μm) aerodynamic diameter. A "<" sign in front of a factor means that the corresponding emission factor is based on one-half of the method detection limit.

^b Emission factors were calculated in units of (lb/MMBtu) based on procedures in EPA Method 19. To convert from (lb/MMBtu) to (lb/106 scf), multiply by the heat content of the fuel. If the heat content is not available, use 1020 Btu/scf. To convert from (lb/MMBtu) to (lb/hp-hr) use the following equation:

$$\text{lb/hp-hr} = (\text{lb/MMBtu}) (\text{heat input, MMBtu/hr}) (1/\text{operating HP, 1/hp})$$

^c Emission tests with unreported load conditions were not included in the data set.

^d Based on 99.5% conversion of the fuel carbon to CO₂. CO₂ (lb/MMBtu) = (3.67)(%CON)(C)(D)(1/h), where %CON = percent conversion of fuel carbon to CO₂.

C = carbon content of fuel by weight (0.75), D = density of fuel, 4.1 E+04 lb/10⁶ scf, and h = heating value of natural gas (assume 1020 Btu/scf at 60°F).

* Based on 100% conversion of fuel sulfur to SO₂. Assumes sulfur content in natural gas of 2,000 gr/10⁶scf.

[†] Emission factor for TOC is based on measured emission levels from 6 source tests.

[‡] Emission factor for methane is determined by subtracting the VOC and ethane emission factors from the TOC emission factor.

[§] VOC emission factor is based on the sum of the emission factors for all speciated organic compounds. Methane and ethane emissions were not measured for this engine category.

^{||} No data were available for uncontrolled engines. PM10 emissions are for engines equipped with a PCC.

[¶] Considered # 1 Fm in aerodynamic diameter. Therefore, for filterable PM emissions, PM10 (filterable) = PM2.5 (filterable).

[‡] No data were available for condensable emissions. The presented emission factor reflects emissions from 4SLB engines.

[§] Hazardous Air Pollutant as defined by Section 112(b) of the Clean Air Act.

[¶] For rich-burn engines, no interference is suspected in quantifying aldehyde emissions. The presented emission factors are based on FTIR and CARB 430 emissions data measurements.

[¶] Ethane emission factor is determined by subtracting the VOC emission factor from the NMHC emission factor.



STATEMENT OF BASIS
Page 1 of 6
TDEC Division of Air Pollution Control

Facility Name: East Tennessee Natural Gas, LLC-Ridgetop Compressor Station (Station 3101)
Permit Number: 583429
Permit Writer: Mark A. Landry (615) 571-2817

Facility ID Number: 74-0064
Date Application Received: April 9, 2025
(with supplemental information dated January 20, 2026 and April 17, 2025)
Date Application Completed: April 9, 2025

FACILITY CATEGORY

This facility is a major source of emissions. The facility-wide Potential to Emit (PTE) of one regulated air pollutant (Carbon Monoxide (CO), and Nitrogen Oxides (NOx)) is at or above the Title V major source thresholds.

FACILITY DESCRIPTION

Natural Gas Compressor Station

PROJECT DESCRIPTION

East Tennessee Natural Gas, LLC-Ridgetop Compressor Station (Station 3101) is requesting an initial Title V Operating Permit. The facility is currently operating under the provisions of construction permit 981635.

COMPLIANCE STATUS

This facility is located in an attainment area for all criteria pollutants according to the NAAQS. The date of the last inspection occurred on May 7, 2026. An NOV was not issued from this inspection.

COLLOCATION DETERMINATION

Collocation is not applicable to this facility.

PERMIT REGISTRY

A permit registry notification is not required for this permit.

PUBLIC NOTICE

This Title V Permit Renewal will undergo a 30-day public notice period and a 45-day EPA comment period in accordance with TAPCR 1200-03-09-.02(11). The notice was published on the TDEC website on October 2, 2026. The affected states were notified on October 2, 2026.

ADDITIONAL PUBLIC PARTICIPATION

DRAFT-PROPOSED October 2, 2026.



STATEMENT OF BASIS
Page 2 of 6
TDEC Division of Air Pollution Control

Facility Name: East Tennessee Natural Gas, LLC-Ridgetop Compressor Station (Station 3101)

Permit Number: 583429

Permit Writer: Mark A. Landry (615) 571-2817

Facility ID Number: 74-0064

Date Application Received: April 9, 2025

(with supplemental information dated January 20, 2026 and April 17, 2025)

Date Application Completed: April 9, 2025

Table 1A: FACILITY EMISSION SOURCES

Source Number	Source Description	Permitted	Exempt/Insignificant	PBR
01	Three Solar® Model 010-01202S0 1,242 bhp at ISO (1,313 bhp @ 0.01 °F) (14.95 MMBtu/hr @ 59.86 °F) Natural Gas-Fired Combustion Turbines	X		
03	One Ford C50G-6005-A Natural Gas-Fired Standby 4 Stroke Rich Burn Emergency Generator Engine [0.71 MMBTU/hr, 68 bhp]	X		
Insignificant Activities	Please refer to permit condition E3-11 for a full list of Insignificant Activities		X	

Table 1B: CHANGES SINCE LAST PERMIT ISSUANCE

Not Applicable



STATEMENT OF BASIS
Page 3 of 6
TDEC Division of Air Pollution Control

Facility Name: East Tennessee Natural Gas, LLC-Ridgetop Compressor Station (Station 3101)
Permit Number: 583429
Permit Writer: Mark A. Landry (615) 571-2817

Facility ID Number: 74-0064
Date Application Received: April 9, 2025
(with supplemental information dated January 20, 2026 and April 17, 2025)
Date Application Completed: April 9, 2025

REGULATORY APPLICABILITY REVIEW

Regulations	Comments/ Requirements (Monitoring/Recordkeeping/Reporting/Testing)
Chapter 6 <i>TAPCR 1200-03-06-.01(7)</i> <i>TAPCR 1200-03-06-.03(2)</i>	Applicable This facility has fuel burning sources. Compliance is assured by the following: Emission Source 74-0064-01: <u>Three Solar® Model 010-01202S0 1,242 bhp at ISO (1,313 bhp @ 0.01 °F) (14.95 MMBtu/hr @ 59.86 °F) Natural Gas-Fired Combustion Turbines</u> Heat input rate of 44.85 MMBtu/hr (combined); the burning of natural gas as the only fuel; AP-42 emission factors; calculations; and recordkeeping. Emission Source 74-0064-03: <u>One Ford C50G-6005-A Natural Gas-Fired Standby 4 Stroke Rich Burn Emergency Generator Engine [0.71 MMBTU/hr, 68 bhp]</u> Heat input rate of 0.71 MMBtu/hr, the burning of natural gas as the only fuel; AP-42 emission factors; calculations; and recordkeeping.
Chapter 7	<i>Not Applicable:</i> This project does not have any process emission sources.
Chapter 10	<i>Not Applicable:</i> This project is not subject to any source testing requirements outlined in this chapter.
Chapter 14 <i>TAPCR 1200-03-14-.01(3)</i>	Applicable This Facility has sources that emit SO₂. Compliance is assured by the following: Emission Source 74-0064-01: <u>Three Solar® Model 010-01202S0 1,242 bhp at ISO (1,313 bhp @ 0.01 °F) (14.95 MMBtu/hr @ 59.86 °F) Natural Gas-Fired Combustion Turbines</u> Heat input rate of 44.85 MMBtu/hr (combined); the burning of natural gas as the only fuel; Natural Gas sulfur limit of 20 gr/100 dscf as stated in TGP FERC NGA Gas Tariff Excerpt; calculations; and recordkeeping. Emission Source 74-0064-03: <u>One Ford C50G-6005-A Natural Gas-Fired Standby 4 Stroke Rich Burn Emergency Generator Engine [0.71 MMBTU/hr, 68 bhp]</u> Heat input rate of 0.17 MMBtu/hr; the burning of natural gas as the only fuel; Natural Gas sulfur limit of 20 gr/100 dscf as stated in TGP FERC NGA Gas Tariff Excerpt; calculations; and recordkeeping.



STATEMENT OF BASIS
Page 4 of 6
TDEC Division of Air Pollution Control

Facility Name: East Tennessee Natural Gas, LLC-Ridgetop Compressor Station
(Station 3101)
Permit Number: 583429
Permit Writer: Mark A. Landry (615) 571-2817

Facility ID Number: 74-0064
Date Application Received: April 9, 2025
(with supplemental information dated January 20, 2026 and April 17, 2025)
Date Application Completed: April 9, 2025

REGULATORY APPLICABILITY REVIEW

Regulations	Comments/ Requirements (Monitoring/Recordkeeping/Reporting/Testing)
<u>Other state regulations:</u> <i>Chapter(s) 16, 18, 22, 25, 27, etc.</i>	<i>Not Applicable:</i> This facility does not contain sources subject to these chapters.
<u>40 CFR 60</u>	<i>Not Applicable:</i> This facility does not contain sources subject to this regulation. *Note: Condition E3-6 references 40 CFR Part 60.331(u) in defining “natural gas”.
<u>40 CFR 61</u>	<i>Not Applicable:</i> This facility emits minimal HAP emissions from fuel combustion.
<u>40 CFR 62</u>	<i>Not Applicable:</i> This facility is not subject to any Federal Plans specified in 40 CFR 62.13
<u>40 CFR 63</u>	Applicable This facility emits minimal HAP emissions from fuel combustion. <u>Subpart ZZZZ</u> <u>Emission Source 74-0064-03: One Ford C50G-6005-A Natural Gas-Fired Standby 4 Stroke Rich Burn Emergency Generator Engine [0.71 MMBTU/hr, 68 bhp]</u> The facility’s natural gas-fired standby 4 stroke rich burn emergency generator engine is subject to the requirements for emergency engines under this subpart, including operating limitations, recordkeeping and reporting.
<u>40 CFR 68</u>	<i>Not Applicable:</i> The facility does not use or store the subject chemicals above threshold quantities.
<u>40 CFR 64</u>	<i>Not Applicable:</i> This is a Title V facility, but the Pollutant Specific Emissions Unit (PSEU) does not meet the applicability criteria outlined in 40 CFR 64.
<u>Special Conditions, Monitoring, Limits</u>	<i>Not Applicable:</i> This facility does not have any special conditions, monitoring, or testing requirements.
Modeling Review	<i>Not Applicable:</i> This facility does not emit Pb, HCl or HF.
Previous Permit Number(s)	981635 (Amendment #1)



STATEMENT OF BASIS
Page 5 of 6
TDEC Division of Air Pollution Control

Facility Name: East Tennessee Natural Gas, LLC-Ridgetop Compressor Station
(Station 3101)
Permit Number: 583429
Permit Writer: Mark A. Landry (615) 571-2817

Facility ID Number: 74-0064
Date Application Received: April 9, 2025
(with supplemental information dated January 20, 2026 and April 17, 2025)
Date Application Completed: April 9, 2025

EMISSION SUMMARY

Table 2: FACILITY WIDE EMISSION LIMIT

Not Applicable

Table 3: FACILITY WIDE EMISSIONS

FACILITY WIDE EMISSIONS			
Pollutant	Actual/Controlled Emissions	Uncontrolled Emissions	Potential to Emit (PTE)
	TPY	TPY	TPY
PM/PM ₁₀ /PM _{2.5}	1.48	1.48	1.48
SO ₂	12.14	12.14	12.14
NO _x	105.94	105.94	105.94
CO	171.98	171.98	171.98
VOC	67.58	67.58	67.58
Total HAPs	5.91	5.91	5.91

Table 4: SOURCE SPECIFIC EMISSIONS

PERMIT EMISSIONS						
Source	Pollutant	Actual /Controlled Emissions	Regulatory Allowable Emissions	Uncontrolled Emissions	Potential to Emit (PTE)	Permitted Allowable
		lb/hr	gr/dscf/lb/hr/lb/MMBTU	lb/hr	lb/hr	gr/dscf/lb/hr/lb/MMBTU
01	PM/PM ₁₀ /PM _{2.5}	0.33	0.407 lb/MMBtu (18.23 lb/hr)	0.33	0.33	0.33 lb/hr
03	PM/PM ₁₀ /PM _{2.5}	0.01	0.600 lb/MMBtu (0.43 lb/hr)	0.01	0.01	0.02 lb/hr
01	SO ₂	2.76	5.0 lb/MMBtu (224.25 lb/hr)	2.76	2.76	2.76 lb/hr
03	SO ₂	0.04	5.0 lb/MMBtu (3.55 lb/hr)	0.04	0.04	0.04 lb/hr



STATEMENT OF BASIS
Page 6 of 6
TDEC Division of Air Pollution Control

Facility Name: East Tennessee Natural Gas, LLC-Ridgetop Compressor Station
(Station 3101)

Permit Number: 583429

Permit Writer: Mark A. Landry (615) 571-2817

Facility ID Number: 74-0064

Date Application Received: April 9, 2025

(with supplemental information dated January 20, 2026 and April 17, 2025)

Date Application Completed: April 9, 2025

PERMIT EMISSIONS

SOURCE 01

Pollutant	Actual/Controlled Emissions	Uncontrolled Emissions	Potential to Emit (PTE)	Permitted Allowable
	TPY	TPY	TPY	TPY
PM/PM ₁₀ /PM _{2.5}	1.45	1.45	1.45	1.45
SO ₂	12.09	12.09	12.09	12.09
NO _x	105.45	105.45	105.45	105.45
CO	171.27	171.27	171.27	171.27
VOC	5.40	5.40	5.40	5.40
Total HAPs	2.64	2.64	2.64	--

PERMIT EMISSIONS

SOURCE 03

Pollutant	Actual/Controlled Emissions	Uncontrolled Emissions	Potential to Emit (PTE)	Permitted Allowable
	TPY	TPY	TPY	TPY
PM/PM ₁₀ /PM _{2.5}	0.00	0.00	0.00	0.00
SO ₂	0.01	0.01	0.01	0.01
NO _x	0.41	0.41	0.41	0.41
CO	0.67	0.67	0.67	0.67
VOC	0.01	0.01	0.01	0.01
Total HAPs	0.01	0.01	0.01	--

SUMMARY AND CONCLUSIONS

It has been determined that this facility, if operated in accordance with the submitted application, will meet all applicable requirements and emission standards.