

PUBLIC NOTICE

Tennessee Gas Pipeline Company, L.L.C.-Compressor Station 856 has applied to the Tennessee Department of Environment and Conservation, Division of Air Pollution Control for renewal of their 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 has a current major source operating permit.

The applicant is **Tennessee Gas Pipeline Company, L.L.C.-Compressor Station 856** with a site address of 2030 Highway 226, Savannah, TN 38372. They have applied for renewal of their existing 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:

Jackson Environmental Field Office
1625 Hollywood Drive
Jackson, TN 38305

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-public-participation/ppo-public-participation/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 September 11, 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 Ms. Michelle W. Owenby, Director, Division of Air Pollution Control, Davy Crockett Tower, 500 James Robertson Parkway, 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. 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: DRAFT-PROPOSED

Permit Number:
579052

Date Expires: DRAFT-PROPOSED

Issued To:

Tennessee Gas Pipeline Company, L.L.C. – Compressor Station 856

Installation Address:

2030 Highway 226
Savannah

Installation Description:

Natural Gas Pipeline Compressor Station:

01: Two Natural Gas-fired Turbine Engines, Unit 1A rated at 5000 hp GE M3502RC
& Unit 2A rated at 7500 hp Westinghouse W81RM-54

02: Natural gas-fired emergency generator, 225 hp Caterpillar G343

NESHAP Subpart ZZZZ

Emission Source Reference No.: 36-0061

Renewal Application Due Date:

Between DRAFT-PROPOSED and DRAFT-PROPOSED

Primary SIC: 49

Information Relied Upon:

Title V Renewal Application dated May 13, 2021 (with supplemental information dated June 15, 2021 and June 16, 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	1
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	4
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	11
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) Retention of Records	17
E3.	General Permit Requirements	18
E4.	36-0061-01: Two natural gas fired turbines	22
E5.	36-0061-02: One 4-cycle (stroke) rich-burn reciprocating natural gas-fired emergency generator engine	24
	End of Permit #579052	29

ATTACHMENT #1	Title V Fee Selection Form APC 36 (CN-1583) (Rev. 4-19)	2 pages
ATTACHMENT #2	Notification of Changes	1 page
ATTACHMENT #3	Agreement Letter dated January 10, 2011	3 pages
ATTACHMENT #4	FERC NGA GAS TARIFF EXCERPT	1 page
ATTACHMENT #5	General Provisions for sources subject to 40 CFR Part 63 Subpart ZZZZ	4 pages
ATTACHMENT #6	Opacity Matrix Decision Tree for Visible Emission Evaluation EPA Method 9, dated June 18, 1996 (amended September 11, 2013)	1 page
ATTACHMENT #7	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	2 pages

ATTACHMENT #8

**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**

3 pages

ATTACHMENT #9

Tennessee Gas Pipeline Company Emission Factors

2 pages

PROPOSED

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. §68-201-109 (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 1200-03-09-.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. 68-201-109 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)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
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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 1200-03-20-.03. For the purposes of this condition, "emergency" shall be substituted for "malfunction(s)" in TAPCR Rule 1200-03-20-.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 1200-03-09-.02(11)(e)6 for such revisions made pursuant to item (c) of this condition which meet the relevant requirements of TAPCR subparagraph 1200-03-09-.02(11)(e), TAPCR subparagraph 1200-03-09-.02(11)(f) and TAPCR subparagraph 1200-03-09-.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 1200-03-09-.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 non-portable 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)(c)1(iii) and part 1200-03-10-.04(2)(b)1 and the compliance requirements of TAPCR subpart 1200-03-09-.02(11)(c)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**

36-0061	<u>Facility Description:</u>	Natural Gas Pipeline Compressor Station: 01: Two natural gas-fired turbine engines 02: One 4-cycle (stroke) rich-burn reciprocating natural gas-fired emergency generator engine installed prior to June 12, 2006)
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E1. Fee payment**FEE EMISSIONS SUMMARY TABLE FOR MAJOR SOURCE 36-0061**

REGULATED POLLUTANTS	ALLOWABLE EMISSIONS (tons per AAP)	ACTUAL EMISSIONS (tons per AAP)	COMMENTS
PARTICULATE MATTER (PM)	4.78	AEAR	Includes all fee emissions
SO ₂	10.08	AEAR	Includes all fee emissions
VOC	1.55	AEAR	Includes all fee emissions
NO _x	251.06	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 permit renewal issuance **began July 1, 2026 and ends June 30, 2027.** The next AAP begins **July 1, 2027** and ends **June 30, 2028** 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) of the TAPCR and approved by the Technical Secretary. If the permittee wishes to revise their annual accounting period or their annual emission fee basis 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 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 TAPCR 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).
 - (2) 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)
 - (3) Sources paying annual fees on a calendar year basis and an actual or mixed emissions basis: pay annual allowable based emission 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)
 - (4) 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 annual accounting period 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)
 - (5) 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

- (6) Sources paying annual fees on a Fee Choice of 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

- (7) 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

- (8) 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)(a) and are dependent on the Responsible Official's choice of fee bases as described above. 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:

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>

TAPCR 1200-03-26-.02(3), (8), and (9), and TAPCR 1200-03-09-.02(11)(e)1(vii)

E2. Reporting requirements.

- (a) **Semiannual reports.** Semiannual reports shall cover the six-month periods from **April** to **September** and **October** to **March** and shall be submitted within 60 days after the end of each six-month period. Subsequent reports shall be submitted within 60 days after the end of each 6-month period following the first report. The first semiannual report following issuance of this permit shall cover the following permits and reporting periods:

Permit Number	Reporting Period Begins	Reporting Period Ends
571462	April 1, 2026	day before new permit issuance (with year)
579052	Issuance Date of new permit (with year)	September 30, 2026

These semiannual reports shall include:

- (1) Any monitoring and recordkeeping required by **conditions E5-2 (Log 2), and E5-18 through E5-20** 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.

Annual compliance certifications shall cover the 12-month period from **October 1** to **September 30** and shall be submitted within 60 days after the end of each 12-month period. The first annual compliance certification following issuance of this permit shall cover the following permits and reporting periods:

Permit Number	Reporting Period Begins	Reporting Period Ends
571462	October 1, 2025	day before new permit issuance (with year)
579052	Issuance Date of new permit (with year)	September 30, 2026

These certifications shall be submitted to:

TN APCD and **EPA**

**Division of Air Pollution Control
Jackson Environmental Field Office
1625 Hollywood Drive
Jackson, TN 38305
or
APC.JackEFO@tn.gov**

**and Air Enforcement Branch
US EPA Region IV
61 Forsyth Street, SW
Atlanta, Georgia 30303
or
Through the EPA CDX
(<https://cdx.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) **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 E3-14 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 May 13, 2021 (with supplemental information dated June 15, 2021 and June 16, 2025), and is signed by Responsible Official John Pannell, Division 9 Director of the permitted facility. Notification was received October 8, 2024 that Jess Coleman – VP Operations 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 May 13, 2021 (with supplemental information dated June 15, 2021 and June 16, 2025), and identifies Julia Griffin, Air Permitting and Compliance Specialist as the Principal Technical Contact for the permitted facility. 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 May 13, 2021 (with supplemental information dated June 15, 2021 and June 16, 2025), and identifies Julia Griffin, Air Permitting and Compliance Specialist 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		Jackson EFO Division of Air Pollution Control 1625 Hollywood Drive Jackson, TN 38305 APC.JackEFO@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 #6 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

- (a) Only natural gas with a maximum total sulfur content of 5 grains/100 scf shall be used as fuel for the sources in this permit.

Compliance Method: The permittee shall maintain documentation to demonstrate that the maximum total sulfur content of the natural gas used as fuel for the sources in this permit is 5 grains/100 scf or less. The permittee shall use one of the following sources of information to make the required demonstration:

- (1) The 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 5 grains/100 scf or less; or
- (2) Representative fuel sampling data which show that the sulfur content of the gaseous fuel does not exceed 5 grains/100 scf. At a minimum, the amount of fuel sampling data specified in section 2.3.1.4 or 2.3.2.4 of appendix D to 40 CFR part 75 is required.

TAPCR 1200-03-09-.03(8) and the application dated May 13, 2021 (with supplemental information dated June 15, 2021 and June 16, 2025), from the permittee

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 #5 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
36-0061-02	ZZZZ	

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

Compliance Method: Compliance methods are provided in **Conditions E5-9 through E5-21** of this permit.

E3-8. VOC and NO_x Emission Statement

Not Applicable

TAPCR 1200-03-18-.02(8), 1200-03-27-.02(6), and 1200-03-09-.03(8)

E3-9. Accidental release plan. The permittee is not required to file an accidental release plan pursuant to Section 112(r) of the Clean Air Act and 1200-03-32 of TAPCR.

E3-10. CAM Plan. This facility is not currently subject to regulations under 40 CFR Part 64 (Compliance Assurance Monitoring).

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
Natural Gas Line Heater	FG-1	0.5 MMBtu/gr	TAPCR 1200-3-9-.04(4)(d)17.
Natural Gas Water Heater	WH-1	0.165 MMBtu/hr	TAPCR 1200-3-9-.04(4)(d)17.
Turbine Oil Storage Tank	T-1	10,543 gal	TAPCR 1200-3-9-.04(5)(a)(4)(i)
Used Oil Tank	T-2	2,224 gal	TAPCR 1200-3-9-.04(4)(d)12.
Fugitive Emissions-Light Oil Service	FUG	N/A	TAPCR 1200-3-9-.04(5)(a)(4)(i)

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 May 13, 2021 (with supplemental information dated June 15, 2021 and June 16, 2025), from the permittee

- E3-14.** For the purpose of calculating actual emissions for fee purposes, the permittee shall maintain records as specified below for each of the turbine engines and the natural gas fired emergency generator engine. These records shall be kept for a period of no less than five years and shall be made available to the Division upon request.

For fee purposes, the permittee may calculate actual oxides of nitrogen (NO_x) emissions, particulate matter (PM) emissions, and volatile organic compound (VOC) emissions from turbine/engine units for each Annual Accounting Period (AAP) using turbine/engine operating hours, actual horsepower, natural gas usage, and AP-42, April 2000, Stationary Gas Turbines, Tables 3.1-1 and 3.1-2a, (Attachment #7), AP-42, October 2024, Natural Gas-fired Reciprocating Engines, Table 3.2-3, or specific turbine test data (Attachments #8 and #9, respectively) or any appropriate combination of these items. Sulfur dioxide (SO₂) emissions for the turbine/engine units shall be calculated using engine/turbine operating hours, actual horsepower, natural gas usage, and an emission factor of 0.014 lb/MMBtu (14.271 lb/MMscf), consistent with the sulfur content limitation contained in **Condition E3-6** of this permit. The results of these calculations shall be recorded, maintained, and entered in Log 1 (or another format providing the required information) specifying the specific emission factors and basis for calculations. If more recent emission factors or test data is used, the basis for such factors shall be provided. These records shall be retained for a period of not less than five (5) years. These records shall be reported in accordance with **Condition E1** of this permit.

Log 1: Fiscal Year (AAP) Log of total emissions from Turbines 1A, 2A, and emergency generator for fee purposes

Year _____ July 1, _____ to June 30, _____

Unit	MM SCF nat. gas during fee year	Design Horsepower	Hours	Horsepower -Hours	Fuel Heating Value (HHV)	Pollutant	Emission Factor and Basis	Fiscal year Emissions (tons)
Turbine Unit 1A						NO _x		
						SO ₂		
						PM		
						VOC		
Turbine Unit 2A						NO _x		
						SO ₂		
						PM		
						VOC		
Emerg. Gen.						NO _x		
						SO ₂		
						PM		
						VOC		

Note: Complete table as required to calculate emissions.

E4. Emission Source 36-0061-01

36-0061-01	Source Description	Two natural gas-fired turbine engines
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Conditions E4-1 through E4-7 apply to source 36-0061-01

- E4-1.** The unit #, model, rated heat input rate, and power output capacities of the two 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)
1A	General Electric M3502RC (Installed 1956)	60	5,000
2A	Westinghouse W81RM-54 (Installed 1958)	104	7,500

TAPCR 1200-03-09-.03(8) and the application dated May 13, 2021 (with supplemental information dated June 15, 2021, and June 16, 2025), from the permittee

Compliance method: The permittee shall maintain documentation to demonstrate the rated heat input rate, and power output capacity of each 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.

- E4-2.** Particulate matter emitted from this source shall not exceed 1.09 pounds per hour, on a daily average basis.

TAPCR 1200-03-06-.01(7) and the application dated May 13, 2021 (with supplemental information dated June 15, 2021, and June 16, 2025), from the permittee.

Compliance Method: Compliance with this emission standard is based on emission factors from EPA AP-42, Table 3.1-2a, dated April 2000 (Attachment #7).

- E4-3.** Sulfur dioxide emitted from this source shall not exceed 2.30 pound per hour, on a daily average basis.

TAPCR 1200-03-14-.01(3) and the application dated May 13, 2021 (with supplemental information dated June 15, 2021, and June 16, 2025), from the permittee.

Compliance Method: Compliance with this emission standard may be demonstrated by compliance with **Conditions E3-6 and E4-1** of this permit.

- E4-4.** For annual fee payment purposes only, Volatile Organic Compounds (VOC) emitted from this source will not exceed 1.53 tons during any period of 12 consecutive months.

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

Compliance Method: None. This is a statement of the source potential to emit for annual emission fee payment purposes only.

- E4-5.** For annual emission fee payment purposes only, Nitrogen oxides (NO_x) emitted from this source shall not exceed 249.66 tons during any period of 12 consecutive months.

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

Compliance Method: None. This is a statement of the source potential to emit for annual emission fee payment purposes only.

- E4-6.** One or more of the compressor engines may be removed and/or replaced with repaired or refurbished equivalent capacity engines 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 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.

- E4-7.** 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 36-0061-02

36-0061-02	Source Description	One 4-cycle (stroke) rich-burn reciprocating natural gas-fired emergency generator engine (installed prior to June 12, 2006) NESHAP 40 CFR 63 Subpart ZZZZ, This unit is considered an existing unit at an area source of HAPs and an affected source pursuant to 63.6590(a)(1)(iii) and specifically an Emergency Stationary SI RICE subject to Table 2d, item 5 of Subpart ZZZZ
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Conditions E5-1 through E5-21 apply to source 36-0061-02

- E5-1.** The unit #, 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)
A-Aux-3	Caterpillar G343 (Installed late 1970's/early 80's)	2.7	225

TAPCR 1200-03-09-.03(8) and the application dated May 13, 2021 (with supplemental information dated June 15, 2021 and June 16, 2025), from the permittee

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.** This generator engine shall not operate more than 500 hours per calendar year based on the application and agreement dated January 10, 2011.

Compliance Method: Compliance is assured by keeping a monthly log of emergency generator engine operating hours as shown in Log 2. Entries for the month of concern shall be made no later than 30 days after the month ends in accordance with **Conditions B1 and E3-4** of this permit.

Log 2 Emergency Generator Engine Operating Hours				
Month	Hours			Justification for use
	Emergency	Maintenance Checks/Readiness Testing	Other	
January				
December				
Total				

- E5-3.** Particulate matter emissions emitted from this source shall not exceed 0.05 pounds per hour, on a daily average basis.

TAPCR 1200-03-06-.01(7) and the application dated May 13, 2021 (with supplemental information dated June 15, 2021 and June 16, 2025), from the permittee.

Compliance Method: The potential particulate matter emissions from this source are less than 5 tons per year. By annual certification of compliance, the permittee shall be considered to meet the monitoring and related recordkeeping and reporting requirements of TAPCR 1200-03-09-.02(11)(e)1(iii) and 1200-03-10-.04(2)(b)(1), and the compliance requirements of TAPCR 1200-03-09-.02(11)(e)3(i).

- E5-4.** Sulfur dioxide (SO₂) emitted from this source shall not exceed 0.04 pounds per hour, on a daily average basis.
- TAPCR 1200-03-14-.01(3) and the application dated May 13, 2021 (with supplemental information dated June 15, 2021 and June 16, 2025), from the permittee.
- Compliance Method:** The potential sulfur dioxide emissions from this source are less than 5 tons per year. By annual certification of compliance, the permittee shall be considered to meet the monitoring and related recordkeeping and reporting requirements of TAPCR 1200-03-09-.02(11)(e)1(iii) and 1200-03-10-.04(2)(b)(1), and the compliance requirements of TAPCR 1200-03-09-.02(11)(e)3(i).
- E5-5.** For annual fee payment purposes only, Volatile Organic Compounds (VOC) emitted from this source will not exceed 0.02 tons during any period of 12 consecutive months.
- TAPCR 1200-03-26-.02(9)
- Compliance Method:** None. This is a statement of the source potential to emit for annual emission fee payment purposes only.
- E5-6.** For annual fee payment purposes only, Nitrogen oxides (NO_x) emitted from this source will not exceed 1.49 tons during any period of 12 consecutive months.
- TAPCR 1200-03-26-.02(9)
- Compliance Method:** None. This is a statement of the source potential to emit for annual emission fee payment purposes only.
- E5-7.** The emergency engines may be removed and replaced with repaired or refurbished equivalent capacity emergency engines in order to maintain facility operation.
- 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.
- E5-8.** 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 E5-9 through E5-21** of this permit.
- 40 CFR §§63.6580; 63.6585(a)&(c); 63.6590(a)(1)(iii)
- Compliance Method:** Compliance with **Conditions E5-9 through E5-21** of this permit is assured through the submittal of the required reports and by maintaining the records required by this permit.
- E5-9.** The facility must be in compliance with the emission limitations, operating limitations, and other requirements in this subpart that apply to the facility at all times.
- 40 CFR §63.6605(a)
- E5-10.** At all times the permittee must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require the permittee to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.
- 40 CFR §63.6605(b)

E5-11. The permittee must meet the following requirements:

- (a) Change oil and filter every 500 hours of operation or within 1 year + 30 days of the previous change, whichever comes first; however, the permittee has the option to utilize an oil analysis program as described in **Condition E5-13** of this permit in order to extend the specified oil change requirement.
- (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.

The permittee must demonstrate continuous compliance with each operating limitation above according to methods specified in **Condition E5-14** of this permit.

40 CFR §63.6603(a) Table 2d, Item 5; 40 CFR §63.6640(a)

E5-12. If the 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 as described in **Condition E5-11** of this permit, 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. The permittee 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.

40 CFR §63.6603(a) Table 2d, Footnote 2

E5-13. The permittee has the option of utilizing an oil analysis program in order to extend the specified oil and filter change requirement in **Condition E5-11** of this permit. The oil analysis must be performed at the same frequency specified for changing the oil and filter in **Condition E5-11** 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 permittee is not required to change the oil and filter. If any of the limits are exceeded, the permittee must change the oil and filter within 2 business days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the permittee must change the oil and filter within 2 business days or before commencing operation, whichever is later. The permittee must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil and filter changes for the engine. The analysis program must be part of the maintenance plan for the engine.

40 CFR §63.6625(j)

E5-14. The permittee must operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop 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.

40 CFR §§63.6625(e)(3); 63.6640 Table 6, Item 9

E5-15. The permittee must install a non-resettable hour meter on the emergency engine if one is not already installed.

40 CFR §63.6625(f)

E5-16. The permittee must minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes.

40 CFR §63.6625(h)

E5-17. The permittee must operate the emergency stationary RICE according to the requirements in **Condition E5-17(a) through (c)** of this permit. Any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per year, as described in **Condition E5-17(a) through (c)** of this permit is prohibited. If the permittee does not operate the engine according to the requirements in **Condition E5-17(a) through (c)** of this permit, the engine will not be considered an emergency engine and must to 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 the purpose specified in **Condition E5-17(b)(1)** of this permit for a maximum of 100 hours per calendar year. Any operation for non-emergency situations allowed by **Condition E5-17(c)** of this permit counts as part of the 100 hours per calendar year allowed by **Condition E5-17(b)** of this permit.
 - (1) The 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 permittee 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 permittee maintains records indicating that Federal, State, or local standards require maintenance and testing of the emergency RICE beyond 100 hours per year.
- (c) The permittee may operate the emergency stationary RICE 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 **Condition E5-17(b)** of this permit. Except as provided in **Condition E5-17(c)(1)** of this permit, 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.
 - (1) The 50 hours per year for non-emergency situations can be used to supply power as part of a financial arrangement with another entity if all of the following conditions are met:
 - (i) The engine is dispatched by the local balancing authority or local transmission and distribution system operator.
 - (ii) The dispatch is intended to mitigate local transmission and/or distribution limitations so as to avert potential voltage collapse or line overloads that could lead to the interruption of power supply in a local area or region.
 - (iii) The dispatch follows reliability, emergency operation or similar protocols that follow specific NERC, regional, state, public utility commission or local standards or guidelines.
 - (iv) The power is provided only to the facility itself or to support the local transmission and distribution system.
 - (v) The owner or operator identifies and records the entity that dispatches the engine and the specific NERC, regional, state, public utility commission or local standards or guidelines that are being followed for dispatching the engine. The local balancing authority or local transmission and distribution system operator may keep these records on behalf of the engine owner or operator.

40 CFR §63.6640(f)

E5-18. If the emergency stationary RICE is operated for the purposes specified in **Condition E5-17(c)(1)** of this permit, the following reporting requirements apply:

- (a) In accordance with the provisions of §63.6650(f), the following report may be included with the Semi-Annual Compliance Report required by **Condition E2(b)** of this permit. The following report must be submitted in the next Semi-Annual Compliance Report following the operation of the emergency stationary RICE for the purposes specified in **Condition E5-17(c)(1)** of this permit. This report should only be submitted if the emergency stationary RICE is operated for the purposes specified in **Condition E5-17(c)(1)** of this permit during the reporting period.
- (b) The report 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 in brake HP, year construction of the engine commenced (as defined in § 63.2, where the exact year is not known, provide the best estimate), and type of engine (CI, SI 2SLB, SI 4SLB, or SI 4SRB)
 - (4) Latitude and longitude of the engine in decimal degrees reported to the fifth decimal place
 - (5) Hours spent for operation for the purpose specified in **Condition E5-17(c)(1)** of this permit, including the date, start time, and end time for engine operation for the purposes specified in **Condition E5-17(c)(1)** of this permit. The report must also identify the entity that dispatched the engine and the situation that necessitated the dispatch of the engine.

40 CFR §63.6650(a) Table 7, Item 4; 63.6650(f)

E5-19. The permittee must report each instance in which the permittee did not meet each operating limitation included in **Condition E5-11** of this permit. These instances are deviations from the operating limitations in 40 CFR Part 63, Subpart ZZZZ, and must be reported according to the following:

- (a) In accordance with the provisions of §63.6650(f), the following report must be included with the Semi-Annual Compliance Report required by **Condition E2(b)** of this permit. The deviation must be reported in the next Semi-Annual Compliance Report following the deviation from the operating limitations specified in **Condition E5-11** of this permit. This report should only be submitted if deviations occur during the reporting period.
- (b) The report must contain the following information:
 - (1) Company name and address
 - (2) Statement by a responsible official, with that official's name, title, and signature, certifying the accuracy of the content of the report
 - (3) Date of report and beginning and ending dates of the reporting period
 - (4) Engine site rating in brake HP, year construction of the engine commenced (as defined in § 63.2, where the exact year is not known, provide the best estimate), and type of engine (CI, SI 2SLB, SI 4SLB, or SI 4SRB).
 - (5) Latitude and longitude of the engine in decimal degrees reported to the fifth decimal place.
 - (6) The total operating time (in hours) of the stationary RICE at which the deviation occurred during the reporting period
 - (7) Information on the number, duration (in hours), and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken.

40 CFR §§63.6640(b); 63.6650(f)

E5-20. The permittee must report each instance in which you did not meet the requirements in Table 8 (Attachment #5) to this subpart that apply to you.

40 CFR §§63.6640(e); 63.6665

E5-21. The permittee shall maintain records as described below in this condition:

- (a) The permittee must keep records of the occurrence and duration (in hours) of each malfunction of operation (i.e., process equipment)
- (b) Records of actions taken during periods of malfunction to minimize emissions in accordance with **Condition E5-10** of this permit, including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation
- (c) The permittee must keep records of the maintenance conducted on the stationary RICE in order to demonstrate that it was operated and maintained according to the permittee's maintenance plan
- (d) The permittee must keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter (See Log 2 of **Condition E5-2** of this permit). The permittee must document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation. If the engine is used for the purposes specified in **Condition E5-17(c)(1)** of this permit, the permittee must keep records of the notification of the emergency situation, and the time the engine was operated for these purposes.
- (e) The records must be in a form suitable and readily available for expeditious review according to 40 CFR §63.10(b)(1). As specified in 40 CFR §63.10(b)(1), the permittee must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. The permittee must keep each record 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)

40 CFR §§63.6655(a); 63.6655(e); 63.6655(f); 63.6660

END OF PERMIT NUMBER 579052

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)

[illegible]

ATTACHMENT #2

Notification of Changes

PROPOSED

Notification of Changes

Facility (Permittee) Tennessee Gas Pipeline Company, L.L.C.- Compressor Station 856

Facility ID 36-0061

Source No. _____

	Control Equipment	Stack Height (Feet)	Stack Diameter (Feet)	Exit Velocity (Feet/Second)	Exit Temperature (°F)
Current					
Proposed					
Current					
Proposed					
Current					
Proposed					

Comments:

As the Responsible Person of the above mentioned facility (permittee), I certify that the information contained in this Notification is accurate and true to the best of my knowledge. As specified in Tennessee Code Annotated Section 39-16-702(a)(4), this declaration is made under penalty of perjury.

Signature		Date
Signer's name (print)	Title	Phone (with area code)

ATTACHMENT #3

Agreement Letter dated January 10, 2011

PROPOSED



1Z 770 165 02 9418 6874

January 10, 2011

2011 JAN 13 PM 3: 55

Mr. Barry Stephens, Technical Secretary
 Department of Environment and Conservation
 Division of Air Pollution Control
 9th Floor, L & C Annex
 401 Church Street
 Nashville, Tennessee 37243-1531

**RE: Compressor Station 856, #36-0061
 Tennessee Gas Pipeline Company
 Title V Operating Permit No. 555663
 Title V Minor Modification Application:
 (40 CFR 63 Subpart ZZZZ RICE MACT Applicability)**

Dear Mr. Stephens:

On August 20, 2010, EPA promulgated and amended 40 CFR 63 Subpart ZZZZ reflecting revisions to stationary Reciprocating Internal Combustion Engine (RICE) categories and associated regulatory requirements for such subject sources. Tennessee Gas Pipeline (TGP) operates a 225 hp Caterpillar G343 emergency generator at Station 856 that will be subject to these requirements and therefore, is submitting this Title V Minor Modification Application to request that applicable requirements be incorporated into the current Title V in effect.

National Emission Standards for Hazardous Air Pollutants (NESHAP) are emissions standards for Hazardous Air Pollutants (HAPs) applicable to both major and area sources of HAPs. A major source of HAP is defined as having potential emissions in excess of 25 tpy for total HAP and/or potential emissions in excess of 10 tpy for any individual HAP. Station 856 is an area source of HAP emissions. The emergency generator was listed as an Insignificant Emission Unit per Tennessee Air Pollution Control Regulation (TAPCR) 1200-3-9-.04(4)(d)(17) in the Title V Renewal Permit Application submitted on December 19, 2008. Effective October 19, 2013, the emergency generator is mandated to comply with applicable requirements under Subpart ZZZZ, and therefore, no longer qualifies as an insignificant emission unit.

As an existing emergency stationary RICE¹ <500 hp located at an area source of HAPs, there is no numerical emission standard for this engine category. Instead, the emergency generator will be subject to a Work Practice which requires application of specific procedures on a defined periodic basis to ensure emissions of HAPs are minimized². TGP will comply with all applicable requirements as promulgated under this amended Subpart ZZZZ and requests incorporation of such requirements into the

¹ The generator meets the definition of an "existing" source under §63.6590(a)(iii) as a stationary RICE located at an area source and commenced construction prior to June 12, 2006.

² Table 6, Item 5 to Subpart ZZZ of Part 63 "Continuous Compliance with Emission Limitations, Operating Limitations, Work Practices, and Management Practices".

renewed permit with an effective date of October 19, 2013. To demonstrate continuous compliance, TGP will comply with applicable requirements as mandated under the following provisions:

Applicable Provisions		Requirements
40CFR63.6590(a)(1)(iii)	Definition of Affected Source	For stationary RICE located at an area source of HAP emissions, a stationary RICE is existing if you commenced construction or reconstruction of the stationary RICE before June 12, 2006.
40CFR63.6595(a)(1)	Compliance Timeline	For stationary RICE located at an area source of HAP emissions, comply with applicable requirements no later than October 19, 2013
40CFR63.6603(a) Table 2d, Item 5	Work Practice	1) Change oil and filter every 500 hours of operation or annually, whichever comes first or alternatively institute an oil analysis program as described in 40 CFR Part 63.6625(j); 2) Inspect spark plugs every 1000 hours or annually, whichever comes first; 3) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.
40CFR63.6625(j)		
40CFR63.6625(e)(3)	Monitoring, Installation, Collection, Operation, Maintenance Requirements	Operate and maintain according to the manufacturer's emission-related written instructions or develop a maintenance plan to provide for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.
40CFR63.6625(f)		Install a non-resettable hour meter.
40CFR63.6625(h)		Minimize idle time during startup and engine start-up time. Not to exceed 30 minutes for each start-up event.
40CFR63.6640(f)(1)(i) through (iii)	Continuous Compliance Demonstration	Engine may be operated: 1) during emergency situations with no time limit; 2) for maintenance and testing not to exceed 100 hours per year if recommended by OEM or federal and state agencies; 3) during non-emergency situations not to exceed 50 hours per year and inclusive of the 100 hours per year maintenance and testing limitation.
40CFR63.6655(e)	Record-keeping	Keep records of maintenance conducted to demonstrate compliance in accordance with 40CFR63.6625(e)(3).
40CFR63.6655(f)		Keep records of the hours of operation recorded through the non-resettable hour meter and document hours spent

Applicable Provisions		Requirements
		for emergency and non-emergency operation.
40CFR63.6660(a) through (c)	Form of Record-keeping	Keep records readily accessible in hard copy or electronic form for at least five years.

As an affected source, under §63.6595(a)(1), the Caterpillar emergency generator must comply with the rule no later than October 19, 2013. Consequently, TGP requests that the effective date when the regulatory requirements cited above become enforceable is reflected in the Title V permit as October 19, 2013 and not as the effective date of the renewed Title V permit. Furthermore, TGP requests that a 500-hour limit on operating hours for the emergency generator be incorporated into the permit.

Attached are the pertinent APC forms, calculation of potential emissions, and supporting documentation for the emergency generator.

I have reviewed this application in its entirety and to the best of my knowledge, and based on information and belief formed after reasonable inquiry, the statements and information contained in this application are true, accurate, and complete.

If you have any questions regarding the content of this letter, please contact Mili Patel at (713) 420-4183 or by email at Mili.Patel@elpaso.com.

Sincerely,



John R. Pannell
Director, Central Division

Attachments:

1. TDEC APC Forms
2. Calculation of Potential Emissions
3. Supporting Documentation

cc: Don Curry w/ Attachments
Station 856 w/ Attachments c/o John Gibbs
Houston Air Files: TGP\TN\Station 856 Title V Correspondence

ATTACHMENT #4

FERC NGA GAS TARIFF EXCERPT

PROPOSED

Tennessee Gas Pipeline Company, L.L.C.
 FERC NGA Gas Tariff
 Sixth Revised Volume No. 1

Third Revised Sheet No. 301
 Superseding
 Second Revised Sheet No. 301

GENERAL TERMS AND CONDITIONS (continued)

II. QUALITY

1. Composition of gas: The gas delivered by Transporter or received by Transporter from Shipper(s) shall be a combustible gas consisting wholly or in part of:
 - (a) Natural gas of the quality and composition produced by nature in petroleum, oil, and gas fields.
 - (b) Gas from revaporized liquefied natural gas.
 - (c) Manufactured, synthesized or mixed gas consisting essentially of the hydrocarbons of the quality and character of natural gas such that when it is comingled with natural gas, the two become indistinguishable.
 - (d) Gas derived and recovered from biomass such as dairy-derived biomethane, methane recovered from a landfill, or methane recovered from a wastewater treatment facility, such that when it is comingled with natural gas, the two become indistinguishable.
2. Transporter, in its own right or in accord with the instructions 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 Shipper. Title to the products will remain with the party that has contracted for the processing rights and notified Transporter of such contract; otherwise, title to the products will remain with Transporter.
3. The provisions set forth in this Article II Section 3 shall apply to all gas delivered by Transporter under this FERC Gas Tariff.
 - (a) Heating value: The natural gas shall have a total heating value of not less than nine hundred and sixty-seven British thermal units per cubic foot nor more than eleven hundred and ten British thermal units. In the event that the total heating value of gas, per cubic foot, when determined by a chromatograph or chromatographic analysis of a sample of gas, falls below nine hundred and sixty-seven or above eleven hundred and ten British thermal units per cubic foot, Shipper shall have the option to refuse to accept said gas so long as said total heating value remains below nine hundred and sixty-seven or above eleven hundred and ten British thermal units per cubic foot.
 - (b) Wobbe Number: The gas shall have a Wobbe Number of at least 1314 but no more than 1400. The Wobbe Number shall be calculated by dividing the total heating value (dry) of the gas (at standard conditions of 14.73 psia and 60 degrees Fahrenheit) by the square root of the specific gravity of the gas.
 - (c) Non-Methane Hydrocarbons: The gas shall not contain more than 12% by volume of non-methane (C2+) hydrocarbons.
 - (d) Heavier Hydrocarbons: The gas shall not contain more than 1.5% by volume of heavier hydrocarbons (C4+).
 - (e) Carbon Dioxide: The gas shall not contain more than 2% by volume of carbon dioxide.
 - (f) Total Sulfur: The gas shall not contain more than five (5) grains of total sulfur (including mercaptans) per 100 cubic feet.
 - (g) Total Diluents: The gas shall not contain more than 4% by volume total diluents, which shall be the combined nitrogen, carbon dioxide, and oxygen by volume, provided however, that the carbon dioxide content does not exceed 2% and the combined nitrogen and oxygen content does not exceed 2.75%.

Issued: December 1, 2011
 Effective: January 1, 2012

Docket No. RP11-1942-001
 Accepted: December 14, 2011

ATTACHMENT #5

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 #6

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)(e)(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.

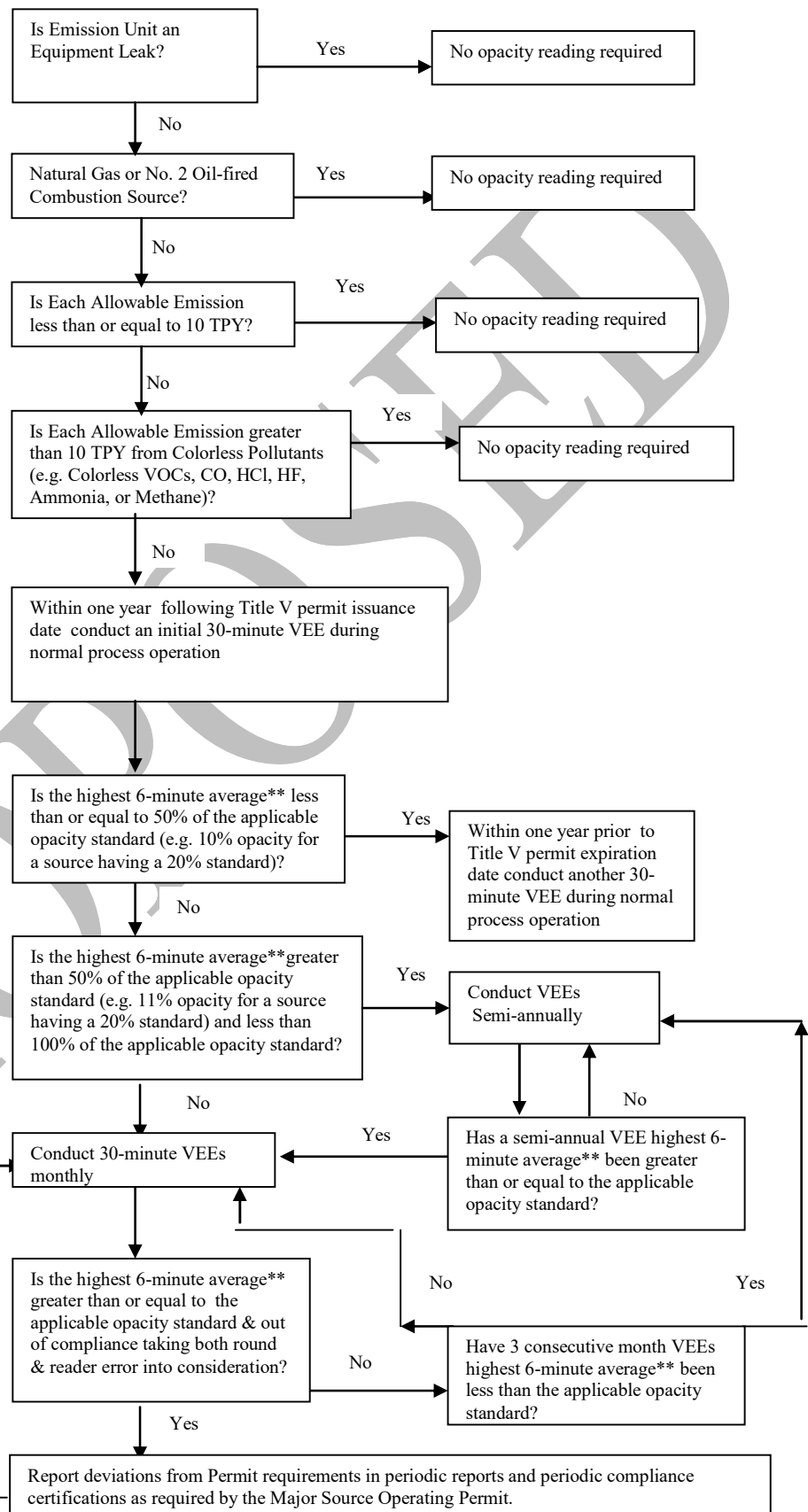
Reader Error
EPA Method 9, Non-NSPS or NESHAPS stipulated opacity standards:
The TAPCD guidance is to declare non-compliance when the highest six-minute average** exceeds the standard plus 6.8% opacity (e.g. 26.8% for a 20% standard).

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 #7

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

PROPOSED

Table 3.1-1. EMISSION FACTORS FOR NITROGEN OXIDES (NO_x) AND CARBON MONOXIDE (CO) FROM STATIONARY GAS TURBINES (revised 4/00)

Emission Factors ^a				
Turbine Type	Nitrogen Oxides		Carbon Monoxide	
Natural Gas-Fired Turbines ^b	(lb/MMBtu) ^c (Fuel Input)	Emission Factor Rating	(lb/MMBtu) ^c (Fuel Input)	Emission Factor Rating
Uncontrolled	3.2 E-01	A	8.2 E-02 ^d	A
Water-Steam Injection	1.3 E-01	A	3.0 E-02	A
Lean-Premix	9.9 E-02	D	1.5 E-02	D
Distillate Oil-Fired Turbines ^e	(lb/MMBtu) ^f (Fuel Input)	Emission Factor Rating	(lb/MMBtu) ^f (Fuel Input)	Emission Factor Rating
Uncontrolled	8.8 E-01	C	3.3 E-03	C
Water-Steam Injection	2.4 E-01	B	7.6 E-02	C
Landfill Gas-Fired Turbines ^g	(lb/MMBtu) ^h (Fuel Input)	Emission Factor Rating	(lb/MMBtu) ^h (Fuel Input)	Emission Factor Rating
Uncontrolled	1.4 E-01	A	4.4 E-01	A
Digester Gas-Fired Turbines ^j	(lb/MMBtu) ^k (Fuel Input)	Emission Factor Rating	(lb/MMBtu) ^k (Fuel Input)	Emission Factor Rating
Uncontrolled	1.6 E-01	D	1.7 E-02	D

^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”.

^b Source Classification Codes (SCCs) for natural gas-fired turbines include 2-01-002-01, 2-02-002-01, 2-02-002-03, 2-03-002-02, and 2-03-002-03. The emission factors in this table may be converted to other natural gas heating values by multiplying the given emission factor by the ratio of the specified heating value to this average heating value.

^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.

^d It is recognized that the uncontrolled emission factor for CO is higher than the water-steam injection and lean-premix emission factors, which is contrary to expectation. The EPA could not identify the reason for this behavior, except that the data sets used for developing these factors are different.

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

^f 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.

^g SCC for landfill gas-fired turbines is 2-03-008-01.

^h Emission factors based on an average landfill gas heating value of 400 Btu/scf at 60°F. To convert from (lb/MMBtu), to (lb/10⁶ scf), multiply by 400.

^j SCC for digester gas-fired turbine is 2-03-007-01.

^k Emission factors based on an average digester gas heating value of 600 Btu/scf at 60°F. To convert from (lb/MMBtu) to (lb/10⁶ scf), multiply by 600.

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 #8

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

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) ^{i,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.

ATTACHMENT #9

Tennessee Gas Pipeline Company Emission factors

PROPOSED

Attachment to Form APC V.28
Emission Factors Used in the Calculation of Potential Emissions and Actual Emissions

Emission Units 1A, 2A, and A-Aux-3

Unit	Unit Type	Emission Factors						
		NO _x	CO	VOC	PM	SO ₂	Total VOC HAP	Total Non-VOC HAP
		Source	Source	Source	Source	Source	Source	Source
1A	Turbine (5,000 HP)	2.15 g/hp-hr	0.49 g/hp-hr	0.0021 lb/MMBtu	0.0066 lb/MMBtu	0.014 lb/MMBtu	0.00103 lb/MMBtu	0.00 lb/MMBtu
		ETG test on 2/19/09 Avg., Casa Grande A2 M3712R (6050 hp rated), 90.4% GP, Speed 81.4 % load	ETG test on 2/19/09 Avg., Casa Grande A2 M3712R (6050 hp rated), 90.4% GP, Speed 81.4 % load	AP-42, Table 3.1-2a, 4/00, and assuming HHV = 1020 BTU/scf	AP-42, Table 3.1-2a, 4/00, and assuming HHV = 1020 BTU/scf	Based on FERC value of 5 gr Total Sulfur /100 scf, and assuming HHV = 1020 BTU/scf	AP-42, Table 3.1-3, 4/00, and assuming HHV = 1020 BTU/scf	AP-42, Table 3.1-3, 4/00, and assuming HHV = 1020 BTU/scf
2A	Turbine (7,500 HP)	0.32 lb/MMBtu	0.082 lb/MMBtu	0.0021 lb/MMBtu	0.0066 lb/MMBtu	0.014 lb/MMBtu	0.00103 lb/MMBtu	0.00 lb/MMBtu
		AP-42, Table 3.1-1, 4/00, and assuming HHV = 1020 BTU/scf	AP-42, Table 3.1-1, 4/00, and assuming HHV = 1020 BTU/scf	AP-42, Table 3.1-2a, 4/00, and assuming HHV = 1020 BTU/scf	AP-42, Table 3.1-2a, 4/00, and assuming HHV = 1020 BTU/scf	Based on FERC value of 5 gr Total Sulfur /100 scf, and assuming HHV = 1020 BTU/scf	AP-42, Table 3.1-3, 4/00, and assuming HHV = 1020 BTU/scf	AP-42, Table 3.1-3, 4/00, and assuming HHV = 1020 BTU/scf
A-Aux-3	Emergency Generator (225 HP)	2.21 lb/MMBtu	3.72 lb/MMBtu	0.0296 lb/MMBtu	0.0194 lb/MMBtu	0.014 lb/MMBtu	0.032 lb/MMBtu	0.0000549 lb/MMBtu
		AP-42, Table 3.2-3, 7/00, and assuming HHV = 1020 BTU/scf and 12,000 BTU/hp-hr	AP-42, Table 3.2-3, 7/00, and assuming HHV = 1020 BTU/scf and 12,000 BTU/hp-hr	AP-42, Table 3.2-3, 7/00, and assuming HHV = 1020 BTU/scf and 12,000 BTU/hp-hr	AP-42, Table 3.2-3, 7/00, and assuming HHV = 1020 BTU/scf and 12,000 BTU/hp-hr	Based on FERC value of 5 gr Total Sulfur /100 scf, and assuming HHV = 1020 BTU/scf	AP-42, Table 3.2-3, 7/00, and assuming HHV = 1020 BTU/scf and 12,000 BTU/hp-hr	AP-42, Table 3.2-3, 7/00, and assuming HHV = 1020 BTU/scf and 12,000 BTU/hp-hr

Notes:

See Emissions Calculations, Appendix A, for further details.

Table 1. Annual Potential To Emit (PTE)
Tennessee Gas Pipeline Company - Station 856

Point Source Criteria PTE

Source	PM	PM10	PM2.5	SO2	NOx	CO	VOC	CO ₂ e
1A 5,000 HP Turbine	1.734	1.734	1.734	3.679	103.805	23.658	0.552	29180.208
2A 7,500 HP Turbine	3.008	3.008	3.008	6.381	145.854	37.375	0.959	50609.43
A-Aux-3 Emergency Generator	0.013	0.013	0.013	0.0095	1.492	2.511	0.020	78.20
Total Point Source Emissions (ton/yr)	4.76	4.76	4.76	10.07	251.15	63.54	1.53	79867.83
Total Point Source Emissions (lb/hr)	1.09	1.09	1.09	2.30	57.34	14.51	0.35	18234.67

HAP PTE

Source	Formaldehyde	Total HAPs Listed
1A 5,000 HP Turbine	0.187	0.270
2A 7,500 HP Turbine	0.324	0.468
A-Aux-3 Emergency Generator	0.014	0.022
Total Point Source Emissions (ton/yr)	0.525	0.760
Total Point Source Emissions (lb/hr)	0.120	0.174



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

Facility Name: Tennessee Gas Pipeline Company, LLC-Compressor Station 856
Permit Number: 579052
Permit Writer: Mark A. Landry (615) 571-2817

Facility ID Number: 36-0061
Date Application Received: May 21, 2021
(with supplemental information dated June 15, 2021 and June 16, 2025)
Date Application Completed: June 15, 2021

FACILITY CATEGORY

This facility is a major source of emissions. The facility-wide Potential to Emit (PTE) of one regulated air pollutant (Nitrogen Oxides (NO_x)) is at or above the Prevention of Significant Deterioration (PSD) and Title V major source thresholds. The PSD applicability threshold for this facility is 250 TPY because it is not one of the 28 listed source categories in the PSD regulations.

FACILITY DESCRIPTION

Natural Gas Compressor Station

PROJECT DESCRIPTION

Tennessee Gas Pipeline Company, LLC-Compressor Station 856 is requesting a Title V Operating Permit renewal. As a part of this renewal, sulfur dioxide emissions are being adjusted to account for the true sulfur content in the natural gas received and consumed by the facility (5 gr S/100 dscf). This sulfur content information is based upon tariff information supplied by the permittee. Also, VOC and NO_x emission limits have been added to the permit for fee purposes.

COMPLIANCE STATUS

This facility is located in an attainment area for all criteria pollutants according to the NAAQS.

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 August 12, 2026. The affected states were notified on August 12, 2026.

ADDITIONAL PUBLIC PARTICIPATION

DRAFT-PROPOSED August 12, 2026



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

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Permit Number: 579052
Permit Writer: Mark A. Landry (615) 571-2817

Facility ID Number: 36-0061
Date Application Received: May 21, 2021
(with supplemental information dated June 15, 2021 and June 16, 2025)
Date Application Completed: June 15, 2021

Table 1A: FACILITY EMISSION SOURCES

Source Number	Source Description	Permitted	Exempt/Insignificant	PBR
01	Two natural gas-fired turbine engines	X		
02	One 4-cycle (stroke) rich-burn reciprocating natural gas-fired emergency generator engine	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: Tennessee Gas Pipeline Company, LLC-Compressor Station 856
Permit Number: 579052
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 (with supplemental information dated June 15, 2021 and June 16, 2025)
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REGULATORY APPLICABILITY REVIEW

Regulations	Comments/ Requirements (Monitoring/Recordkeeping/Reporting/Testing)
<u>Chapter 6</u> TAPCR 1200-03-06-.01(7)	Applicable This facility has fuel burning sources. Compliance is assured by the following: Emission Source 36-0061-01: <u>Two natural gas-fired turbine engines</u> Heat input rate of 164 MMBtu/hr (combined); the burning of natural gas as the only fuel; AP-42 Emission Factors (Table 3.2-1 (10/24)); calculations, and recordkeeping. Emission Source 36-0061-02: <u>One 4-cycle (stroke) rich-burn reciprocating natural gas-fired emergency generator engine</u> Heat input rate of 2.7 MMBtu/hr, the burning of natural gas as the only fuel, and annual certification of compliance.
<u>Chapter 7</u>	<i>Not Applicable:</i> This project does not have any process emission sources.
<u>Chapter 10</u>	<i>Not Applicable:</i> This project is not subject to any source testing requirements outlined in this chapter.
<u>Chapter 14</u> TAPCR 1200-03-14-.01(3)	Applicable This Facility has sources that emit SO₂. Compliance is assured by the following: Emission Source 36-0061-01: <u>Two natural gas-fired turbine engines</u> Heat input rate of 164 MMBtu/hr (combined), the burning of natural gas as the only fuel, Natural Gas sulfur limit of 5 gr/100 dscf as stated in TGP FERC NGA Gas Tariff Excerpt, calculations, and recordkeeping. Emission Source 36-0061-02: <u>One 4-cycle (stroke) rich-burn reciprocating natural gas-fired emergency generator engine</u> Heat input rate of 2.7 MMBtu/hr (combined), the burning of natural gas as the only fuel, Natural Gas sulfur limit of 5 gr/100 dscf as stated in TGP FERC NGA Gas Tariff Excerpt, calculations, and recordkeeping.
<u>Other state regulations:</u> <u>Chapter(s) 16, 18, 22, 25, 27,</u> <u>etc.</u>	<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.



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

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Permit Number: 579052
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Facility ID Number: 36-0061
Date Application Received: May 21, 2021
(with supplemental information dated June 15, 2021 and June 16, 2025)
Date Application Completed: June 15, 2021

REGULATORY APPLICABILITY REVIEW

Regulations	Comments/ Requirements (Monitoring/Recordkeeping/Reporting/Testing)
<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 36-0061-02: One 4-cycle (stroke) rich-burn reciprocating natural gas-fired emergency generator engine</u> The facility's 4-cycle (stroke) rich-burn reciprocating natural gas-fired emergency generator 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>	Applicable: Testing is required by 40 CFR Part 60, Subpart JJJJ - Standards of Performance for Stationary Spark Ignition Internal Combustion Engines [60.4243(b)(2)(ii)] every 3 years or 8,760 hours of operation, whichever comes first, to demonstrate compliance.
Modeling Review	<i>Not Applicable:</i> This facility does not emit Pb, HCl or HF.
Previous Permit Number(s)	571462



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

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Permit Number: 579052
Permit Writer: Mark A. Landry (615) 571-2817

Facility ID Number: 36-0061
Date Application Received: May 21, 2021
 (with supplemental information dated June 15, 2021 and June 16, 2025)
Date Application Completed: June 15, 2021

EMISSION SUMMARY

Table 2: FACILITY WIDE EMISSION LIMIT

Not Applicable

Table 3A: FACILITY WIDE EMISSIONS –Prior to renewal

FACILITY WIDE EMISSIONS			
Pollutant	Actual/Controlled Emissions	Uncontrolled Emissions	Potential to Emit (PTE)
	TPY	TPY	TPY
PM/PM ₁₀ /PM _{2.5}	4.81	4.81	4.81
SO ₂	0.48	0.48	0.48
NO _x	251.34	251.34	251.34
CO	63.76	63.76	63.76
VOC	3.62	3.62	3.62
Total HAPs	0.76	0.76	0.76

Table 3B: FACILITY WIDE EMISSIONS –After renewal

FACILITY WIDE EMISSIONS			
Pollutant	Actual/Controlled Emissions	Uncontrolled Emissions	Potential to Emit (PTE)
	TPY	TPY	TPY
PM/PM ₁₀ /PM _{2.5}	4.81	4.81	4.81
SO ₂	10.12	10.12	10.12
NO _x	251.34	251.34	251.34
CO	63.76	63.76	63.76
VOC	3.62	3.62	3.62
Total HAPs	0.76	0.76	0.76

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}	1.09	57.12 lb/hr	1.09	1.09	1.09 lb/hr
02	PM/PM ₁₀ /PM _{2.5}	0.05	4.37 lb/hr	0.05	0.05	0.05 lb/hr
01	SO ₂	2.30	820.00 lb/hr	2.30	2.30	2.30 lb/hr
02	SO ₂	0.04	13.5 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: Tennessee Gas Pipeline Company, LLC-Compressor Station 856
Permit Number: 579052
Permit Writer: Mark A. Landry (615) 571-2817

Facility ID Number: 36-0061
Date Application Received: May 21, 2021
(with supplemental information dated June 15, 2021 and June 16, 2025)
Date Application Completed: June 15, 2021

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}	4.77	4.77	4.77	4.77
SO ₂	10.07	10.07	10.07	10.07
NO _x	249.57	249.547	249.57	249.57
CO	61.01	61.01	61.01	--
VOC	1.53	1.53	1.53	1.53
Total HAPs	0.74	0.74	0.74	--

PERMIT EMISSIONS				
SOURCE 02				
Pollutant	Actual/Controlled Emissions	Uncontrolled Emissions	Potential to Emit (PTE)	Permitted Allowable
	TPY	TPY	TPY	TPY
PM/PM ₁₀ /PM _{2.5}	0.01	0.01	0.01	0.01
SO ₂	0.01	0.01	0.01	0.01
NO _x	1.49	1.49	1.49	1.49
CO	2.51	2.51	2.51	--
VOC	0.02	0.02	0.02	0.02
Total HAPs	0.02	0.02	0.02	--

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.