FACT SHEET FOR: OP24R1-043 **DATE:**

DWEE ID: 70919

Name of Source: OPPD – Cass County Station

Source Classification: Class I at time of issuance
Area Source of Hazardous Air Pollutants (HAPs)

Regulatory changes may supersede information in this document. If the source should add or change equipment or change processes such that a NESHAP or NSPS subpart becomes an applicable requirement, it is the source's obligation to comply with that subpart and applicable requirements whether or not they are identified in the associated permitting action or Title 129. Also note that the NESHAP and NSPS subparts are subject to change. Detailed information related to NESHAP and NSPS subparts can be found on the DWEE Air Toxics Notebook and DWEE NSPS Notebook located on the DWEE website (https://dwee.nebraska.gov/). The DWEE website can also be used to find other permit related and facility specific information that is not identified in this fact sheet.

DESCRIPTION OF THE SOURCE OR ACTIVITY:

This operating permit (OP), #24R1-043, authorizes the operation of an electrical generation facility. Omaha Public Power District Cass County Station (OPPD Cass County Station) operates under SIC code 4911 (Electric Services).

This OP permit renewal incorporates requirements from construction permits (CP), CP24-038 (issued July 23, 2025), for the existing emergency diesel engine (EP 3-1) and CP26-005 (issued July 2, 2026) for the existing combustion turbines (EP 1-1 and EP 2-1). This permitting action applies only to the existing equipment identified above.

On February 2, 2026, the Department received Construction Permit revision application #26-005. The application requested reinstatement of the emissions limits and requirements from CP00-0050 (issued November 15, 2001) and CPM03-0016 (issued April 28, 2004) for combustion turbines CT-1 and CT-2 until completion of the natural gas burner upgrade authorized under CP24-038.

The upgrade is expected to improve efficiency, increase capacity, and reduce emissions. However, the emission limits in CP24-038 are based on post-upgrade performance. In a letter dated September 18, 2025, OPPD stated that the turbines cannot meet those limits until the upgrade is complete. The facility confirmed compliance with CP00-0050 and CPM03-0016 and requested reinstatement of those requirements to maintain compliance during the interim period.

Once reconstruction of combustion turbines CT-1 and CT-2 is complete, the more stringent emission limits prescribed in Construction Permit CP26-005 will apply.

PERMIT HISTORY

Date Issued	Number	Status
11/15/2001	CP00-0050	Not active; superseded by CP24-038
04/28/2004	CPM03-0016	Not active; superseded by CP24-038
07/15/2005	OPSP-0356	Not active; superseded by OP10R1-001
01/11/2019	ACIDR-0015	Not active; superseded by ACIDR-0002
07/14/2015	ACIDR-0002	Not active; superseded by 19AR-028
07/15/2015	OP10R1-001	Not active; superseded by OP19R1-027
07/21/2020	OP19AR-028	Not active; superseded by OP24AR-044
07/21/2020	OP19R1-027	Not active; superseded by OP24R1-043
07/23/2025	CP24-038	Partially active; Conditions I., II., and III.(A) superseded by CP26-005
07/02/2026	CP26-005	Active

Date Issued	Number	Status
tbd	OP24AR-044	Active
tbd	OP24R1-043	Active

PERMIT ACTION:

Permitted Emission Points are detailed in the table below:

Control Equipment ID# and Description	Emission Unit Description	Applicable NSPS Requirements	Applicable NESHAP Requirements	Other Applicable Requirements
Emission Point ID#: EP 1-1				
Low NO_x Burner	CT-1, Siemens Westinghouse Model W501F DLN; 2,065 MMBtu/hr; natural gas combustion turbine; installed 2003	40 CFR Part 60, Subpart A; Title 129, Chapter 12, Section 001.01 40 CFR Part 60, Subpart GG; Title 129, Chapter 12, Section 001.38	None	CSAPR: 40 CFR Part 97, Subpart AAAAA CSAPR: 40 CFR Part 97, Subpart DDDDD 40 CFR Parts 72, 73, 75, 76, 77; Title 129, Chapter 5
Emission Point ID#: EP 2-1				
Low NO_x Burner	CT-2, Siemens Westinghouse Model W501F DLN; 2,065 MMBtu/hr; natural gas combustion turbine; installed 2003	40 CFR Part 60, Subpart A; Title 129, Chapter 12, Section 001.01 40 CFR Part 60, Subpart GG; Title 129, Chapter 12, Section 001.38	None	CSAPR: 40 CFR Part 97, Subpart AAAAA CSAPR: 40 CFR Part 97, Subpart DDDDD 40 CFR Parts 72, 73, 75, 76, 77; Title 129, Chapter 5
Emission Point ID#: EP 3-1				
N/a	EU-3: Model 6BT5.9-G6, No. 2 diesel fuel reciprocating internal combustion engine (RICE), 134-hp, displacement of 0.98-liters/cylinder, emergency, non-black start, compression ignition, existing RICE installed in 2002	None	40 CFR Part 63, NESHAP Subpart A; Title 129, Chapter 13, Section 002.01 40 CFR Part 63, NESHAP Subpart ZZZZ; Title 129, Chapter 13, Section 002.78	None

TYPE AND QUANTITY OF AIR CONTAMINANT EMISSIONS ANTICIPATED:

The following table summarizes the potential and actual emissions:

Regulated Pollutant	Potential Emissions as limited by permit (tons/year)	Actual Emissions[2] (tons/year)
Particulate Matter (PM)	34.67	- [3]
Particulate Matter less than or equal to 10 microns (PM_{10})	34.67	2.40
Particulate Matter less than or equal to 2.5 microns ($PM_{2.5}$)	34.60	2.40
Sulfur Dioxide (SO_2)	3.60	0.54
Oxides of Nitrogen (NO_x)	315.86	55.61
Carbon Monoxide (CO)	140.45	0.32
Volatile Organic Compounds (VOCs)	7.71	1.89
Greenhouse Gases (GHGs)[1]	496,441	107,267
Carbon Dioxide Equivalents (CO_2e)[1]	496,974	107,373
Hazardous Air Pollutants (HAPs)		
Greatest Individual HAP(s) Formaldehyde	3.18	0.64
All Other HAPs	1.49	0.28
Total HAPs	4.67	0.92

[1] The U.S. Supreme Court ruled in 2014 that greenhouse gases (GHGs) may not be used to determine whether a source is a Class I (major) source. Utility Air Regulatory Group v. EPA, 134 S. Ct. 2427 (2014). Therefore, potential emissions of GHGs will not be used to determine a source's operating permit classification at this time. However, GHGs are still regulated air pollutants so GHGs and CO_2e will continue to be calculated and reported in this fact sheet.
[2] Actual Emissions are from 2025 air emissions inventory.
[3] Actual PM emissions are not required to be reported in the annual emissions inventory.

SUPPLEMENTAL INFORMATION:

Title 129, Chapter 4 - Prevention of Significant Deterioration (PSD) of Air Quality

OPPD Cass County Station does not belong to one of the listed source categories specified in 40 CFR §52.21, therefore, OPPD Cass County Station is not required to include fugitive emissions when determining major new source review (NSR) applicability. OPPD Cass County Station is classified as a major stationary source under the NSR program because potential emissions (excluding fugitive emissions) are above the NSR major source threshold of 250 tons per year per pollutant for oxides of nitrogen (NO_x).

The following best available control technology (BACT) requirements were established in construction permit CP00-0050, issued November 15, 2001. CP00-0050 was superseded by Construction Permit CP24-038, issued July 23, 2025, and Condition III.(A) of CP24-038 was subsequently superseded by CP26-005, issued July 2, 2026. These BACT requirements have been installed and/or implemented at

OPPD Cass County Station and apply to existing combustion turbines CT-1 and CT-2, each rated at 2,065 MMBtu/hr when firing natural gas.

Emission Unit	Pollutant	Fuel Type	BACT	Emission Rate per Emission Unit
CT-1, CT-2	PM / PM_{10}	Natural Gas	Good combustion practices	15.3 lb/hr
	NO_X	Natural Gas	Dry low-NO_X burner	136.0 lb/hr and 20 ppmvd at 15% O_2
	CO	Natural Gas	Good combustion practices	63.0 lb/hr and 15 ppmvd at 15% O_2

Title 129, Chapter 5 – Acid Rain

The combustion turbines at OPPD Cass County Station are affected units under the Acid Rain Program, specifically under 40 CFR 72.6(a)(3)(i). Emission units (EU), CT-1 and CT-2, are considered utility units that produce electricity for sale, and are considered new units that commenced operation after November 15, 1990. The provisions of the Acid Rain Program, as adopted in Title 129, Chapter 5 and found in the Acid Rain Permit for this source, apply to these emission units. The Acid Rain Permit is included as an attachment to this operating permit.

Title 129, Chapter 12 - New Source Performance Standards (NSPS) and Emission Limits for Existing Sources

Emission units CT-1 and CT-2 are natural gas-fired combustion turbines, each with a heat input capacity of 2,065 MMBtu/hr. These units were manufactured in 2002 and installed at the facility in 2003.

Emission unit EU-3 is an existing 134-horsepower emergency compression ignition engine with a maximum displacement of 0.98 liters per cylinder. This engine was manufactured in October 2002 and installed at the facility in November of the same year.

The following NSPS are identified as applicable to OPPD Cass County Station:

40 CFR 60 Subpart A – General Provisions

Subpart A - General Provisions: This subpart, adopted by reference in Title 129, Chapter 12, Section 001.01, applies to those units subject to another NSPS. The source is required to comply with any emission limitations, testing requirements, recordkeeping, or notification requirements that apply to the emission units.

40 CFR 60 Subpart GG- Standards of Performance for Stationary Gas Turbines {40 CFR 60.330}: This subpart, adopted by reference in Title 129, Chapter 12, Section 001.38, applies to all stationary gas turbines with a heat input at peak load equal to or greater than 10 MMBtu/hr, based on the lower heating value of fuel fired, and which commenced construction, modification, or reconstruction after October 3, 1977. This subpart applies to EU CT-1 and EU CT-2.

The following NSPS are identified as not applicable to OPPD Cass County Station:

Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels {40 CFR 60.110b}: This subpart, adopted by reference in Title 129, Chapter 12, Section 001.19, applies to storage vessels with a capacity greater than or equal to 75 cubic meters (m^3), 19,800 gallons, that is used to store volatile organic liquids for which construction, reconstruction, or modification is commenced after July 23, 1984. Tanks that are used within a process (including a solvent or raw material recovery process) to collect material discharged from a feedstock storage vessel or equipment within the process before the material is transferred to other equipment within the process, to a product or by-product storage vessel, or to a vessel

used to store recovered solvent or raw material (i.e. process vessels) are exempt from this subpart. Therefore, the 1,000 gallon diesel fuel tank (EU-TANK) is less than 19,800 gallons and is not subject to this subpart.

40 CFR 60, Subpart IIII- Standards of Performance for Stationary Compression Ignition Internal Combustion Engines {40 CFR 60.4200}: This subpart, adopted by reference in Title 129, Chapter 12, Section 001.80, applies to owners and operators of stationary compression ignition (CI) internal combustion engines (ICE) that commence construction, modification, or reconstruction after July 11, 2005 where the stationary CI ICE are manufactured after April 1, 2006 and are not fire pump engines, or manufactured as a certified National Fire Protection Association (NFPA) fire pump engines after July 1, 2006. For the purposes of this subpart, the date that construction commences is the date the engine is ordered by the owner or operator. Emergency engine, EU-3, commenced construction before July 11, 2005, and hasn't been modified or reconstructed; therefore, is not subject to this subpart.

40 CFR 60 Subpart KKKK- Standards of Performance for Stationary Combustion Turbines {40 CFR 60.4300}: This subpart, adopted by reference in Title 129, Chapter 12, Section 001.82, applies to owners or operators of stationary combustion turbines with a heat input at peak load equal to or greater than 10 MMBtu per hour, based on the fuel's higher heating value, which commenced construction, modification, or reconstruction after February 18, 2005. The existing combustion turbines (EU CT-1 and EU CT-2) are not subject to this subpart because commencement of construction, modification, or reconstruction occurred before February 18, 2005.

Subpart TTTT – Standards of Performance for Greenhouse Gas Emissions for Electric Generating Units {40 CFR 60.5508}: This subpart, adopted by reference in Title 129, Chapter 12, Section 002.72, applies to stationary combustion turbines that commence construction or reconstruction after January 8, 2014, but before May 23, 2023, that have a base load rating great than 250 MMBtu per hour of fossil fuel and are capable of selling greater than 25-MW of electricity to a utility power distribution system.

The existing combustion turbines (EU CT-1 and EU CT-2) are not subject to this subpart as they do not meet the definition of reconstruction.

Title 129, Chapter 15 - Compliance

Process Weight Rate

Title 129, Chapter 15, Section 001.01, limits PM (filterable) emissions to the amounts shown in Table 15-1 during any one hour. These process weight rate limits, which are based on throughput of the emission units, vary as throughputs change. Since the potential to emit for each emission point is less than the process weight rate limitations, these PM limitations were not included in Condition III of this permit.

Particulate Emissions from Combustion Sources

All of the PM emission points subject to the Chapter 15, Section 001.02 limitations are in compliance with those limitations, as the potential to emit for each emission point is less than the limitations. Therefore, these PM limitations were not included in Condition III of this permit.

Opacity Limitations from Emission Units (Section 001.04)

Specific Condition I.(J) specifies that no person shall cause or allow emissions, from any source, which has an opacity equal to or greater than twenty percent (20%). Opacity must be determined using an EPA-approved method or recorded by a continuous opacity monitoring system which has been operated and maintained pursuant to 40 CFR Part 60 Appendix B except as provided for in Chapter 15, Sections 001.05 and 001.05E (Title 129, Chapter 15, Section 001.04). Therefore, while not specifically stated in Condition III, this requirement is still applicable to all emission units at the source.

Title 129, Chapter 13, Sections 002 and 003 - National Emission Standards for Hazardous Air Pollutants (NESHAP)

Combustion Turbines, EU CT-1 and CT-2, are natural gas-fired combustion turbines, each with a 2,065 MMBtu/hr for combusting natural gas. These units were manufactured in 2002 and installed at the facility in 2003.

Emergency engine, EU-3, is an existing 134-horsepower emergency compression ignition engine with a maximum displacement of 0.98 liters/cylinder. This engine was manufactured in October of 2002 and installed at the facility in November of that same year.

This source is currently classified as an area source of hazardous air pollutants (HAPs). An area source of HAPs has the potential to emit less than 10 tpy of individual HAP and less than 25 tpy of combined HAPs. Applicable and potentially applicable subparts are discussed below.

The following NESHAP are identified as applicable to OPPD Cass County Station:

Subpart A – General Provisions: This subpart, adopted by reference in Title 129, Chapter 13, Section 002.01, applies to all sources subject to a NESHAP standard unless otherwise stated in the rule. OPPD Cass County Station is subject to this subpart because it is subject to Subpart ZZZZ.

40 CFR 63 Subpart ZZZZ – National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines {40 CFR 63.6580}: This subpart, adopted by reference in Title 129, Chapter 13, Section 002.78, applies to stationary reciprocating internal combustion engines located at a major (≥10 tons/year of individual HAP or ≥25 tons/year of combined HAPs) or area (non-major) source of HAPs, except if the stationary RICE is being tested at a stationary RICE test cell/stand. Emergency engine, EU-3, is subject to this standard.

Under NESHAP Subpart ZZZZ, EU-3 must comply with conditions including, but not limited to, operational, fuel, and recordkeeping requirements, as well as a requirement to install a non-resettable hour meter. If at any time the engine is not operated in accordance with 40 CFR 63.6640(f), the source must follow the applicable requirements for non-emergency engines.

The following NESHAP are identified as not applicable to OPPD Cass County Station:

40 CFR 63 Subpart YYYY- National Emissions Standards for Hazardous Air Pollutants for Stationary Combustion Turbines {40 CFR 63.6080}: This subpart, adopted by reference in Title 129, Chapter 13, Section 002.77, applies to stationary combustion turbines located at major sources of HAP. OPPD Cass County Station is not a major source of HAPs; therefore, this standard does not apply.

Title 129, Chapter 13, Section 004 – Hazardous Air Pollutants (MACT and T-BACT)

During the evaluation of CP00-0050, Chapter 13, Section 004 (State BACT) applied to each HAP that equaled or exceeded 2.5 tpy in potential emissions. At OPPD Cass County Station, formaldehyde was the HAP with emissions that exceeded the 2.5 tpy threshold. OPPD proposed the use of good combustion practices in combination with restrictions on fuel usage and hours of operation to meet the State BACT requirement at OPPD Cass County Station.

This OP permitting action does not subject OPPD Cass County Station to any new BACT requirements as specified in Section 004.02 of this chapter because the project's potential to emit for any single HAP and for total HAPs are below the respective 2.5 and 10 tpy thresholds as defined in this section.

OPPD Cass County Station is not subject to any maximum achievable control technology requirements specified in Section 004.03 of this chapter because the facility is classified as an area source of HAPs.

SPECIFIC PERMIT CONDITIONS DISCUSSION:

Condition III includes conditions that are specific to the emissions units and emission points listed in each respective condition. Permit conditions that require no additional discussion are not included in this section.

III.(A) Specific Conditions for Stationary Combustion Turbines

(A)(2) This condition establishes the permitted emission limitations for the combustion turbines. Each turbine is subject to multiple NO_x emission limitations under BACT and NSPS Subpart GG; however, compliance with the BACT NO_x limits also demonstrates compliance with the NSPS Subpart GG NO_x limits.

Compliance with the BACT NO_x limits is demonstrated through the continuous monitoring system (CMS) and variable load testing requirements contained in this permit pursuant to the Acid Rain program. The source has historically used the testing required under the Acid Rain program to demonstrate compliance with both the BACT and NSPS Subpart GG NO_x limits.

In addition, an EPA Applicability Determination Index dated April 23, 2001 states that a source may use a correlation graph developed in accordance with 40 CFR Part 75, Appendix E, in lieu of the methods specified in Subpart GG to demonstrate compliance with NO_x emission limits, provided the units qualify as peaking units under the Acid Rain regulations. Condition III.(A)(4)(b)(ii) requires Cass County Station to track capacity factor to ensure the units continue to qualify as peaking units under the Acid Rain program.

This condition also establishes BACT emission limitations for CO and PM_{10}. Compliance with these limits must be demonstrated through performance testing is required within five (5) years of the most recent valid performance test. A more specific testing timeframe is not included in order to provide the source with flexibility to conduct the CO and PM_{10} testing concurrently with the NO_x testing required under the Acid Rain program, if desired. Although the particulate matter emission limit is expressed as PM_{10}, most particulate emissions are expected to be within the PM_{10} size range. Therefore, testing for total PM will provide a slightly conservative estimate of PM_{10} emissions. The Acid Rain program currently requires NO_x testing once every 20 calendar quarters (i.e., every five years) pursuant to Title 129, Chapter 15, Section 005.01.

Testing for CO and PM_{10} was completed on May 10 and 11, 2023, and testing for NO_x was completed on September 11–14, 2023, under operating permit OP19R1-027, issued July 21, 2020. Under this permitting action, subsequent performance testing is required within five (5) years of the most recent valid performance test.

(A)(3)(a) This condition requires that the turbines combust only natural gas. According to the source, these units are equipped to burn only natural gas. This condition also requires that the sulfur content of the fuel not exceed 0.8% by weight, as required by NSPS Subpart GG.

(A)(3)(b) This condition limits the turbines to a combined maximum heat input rate of 8.95E06 MMBtu during any 365 consecutive-day period, based on a rolling daily sum. The PTE for this source was calculated using this limit.

(A)(3)(c) This condition requires that the turbines be limited by fuel consumption to 2,065 MMBtu/hr for each turbine. The PTE for this source was calculated utilizing this limit.

(A)(3)(e) This condition requires that, if the source elects to use alternative or parametric NO_x monitoring for Acid Rain instead of a continuous emissions monitoring system (CEMS), the source must operate a CMS to continuously monitor certain parameters, including load, fuel flow rate, percent pilot fuel, percent C-stage fuel, and exhaust gas temperature. These parameters must remain within the ranges established in the Acid Rain QA/QC Plan.

This condition also requires data sampling and recording at the frequency specified in 40 CFR Part 60, Subpart GG [40 CFR 60.13(e)(2)]. As noted, the current NSPS Subpart GG requirement is more specific regarding data sampling and recording frequency, requiring monitoring every 15 minutes rather than 4 times per hour. In the event of a conflict, the source shall comply with the current NSPS requirement, as specified in compliance with Condition III.(A)(1)(b).

In addition, this condition requires that the NO_x emission rate be recorded based on the NO_x prediction curve established through Acid Rain variable load testing.

(A)(3)(h) This condition provides requirements regarding the monitoring of the sulfur and nitrogen contents of the fuel being fired in accordance with NSPS Subpart GG. In correspondence received by the Department on March 20, 2003, EPA approved the use of alternative monitoring procedures for demonstration of compliance with applicable NSPS Subpart GG limits on fuel sulfur content and a waiver of the nitrogen sampling of natural gas and oil as long as no credit is taken for fuel-bound nitrogen; the letter contains specific conditions to comply with the custom fuel monitoring schedule. OPPD explained in email correspondence from January 16, 2015 that no allowance for fuel-bound nitrogen is being claimed. Therefore, fuel nitrogen content is currently not monitored.

(A)(4)(a)(i) As stated in the Condition III.(A)(3)(h) discussion above, in lieu of the sulfur and nitrogen content monitoring of NSPS Subpart GG, a custom fuel monitoring schedule was approved by EPA in a letter dated March 17, 2003 and received by the Department on March 20, 2003.

(A)(4)(b)(i) This condition requires that the source keep records of the energy consumption of the two combustion turbines by tracking the fuel Btu content and fuel usage and inputting those numbers into a given equation; this will demonstrate compliance with the requirements of Conditions III.(A)(3)(b) and (c).

(A)(4)(b)(ii) This condition requires that the source calculate and keep records of the annual capacity factor as defined under 40 CFR 72.2. The capacity factor of each unit is important because a unit must have an average capacity factor of no more than 10.0 percent during the previous three calendar years and a capacity factor of no more than 20.0 percent in each of those calendar years in order to meet the definition of a peaking unit. If the source exceeds those levels, they will no longer meet the definition of a peaking unit and will need to comply with the newly appropriate requirements of the Acid Rain program and must install a NO_x CEMs.

(A)(4)(b)(iii) This condition requires that the source maintain records of the hourly values of the operating parameters load, fuel flow rate, percent of pilot fuel, percent of C-Stage fuel, and temperature of the exhaust gas stream.

III.(B) Specific Conditions for Stationary Reciprocating Internal Combustion Engine

(B)(1)(b) This condition requires the source to comply with applicable NESHAP Subparts A and ZZZZ for the emergency engine (EU-3). If the engine is no longer operated as an emergency engine in accordance with Subpart ZZZZ, the source must comply with the applicable requirements for non-emergency engines under Subpart ZZZZ. Current emergency engine requirements include fuel provisions (63.6604(b)), maintenance and hour meter requirements (63.6625(e)(3) and (f)), operational and continuous compliance requirements (63.6640(f)), and recordkeeping requirements (63.6655(e)(2) and (f)).

(B)(3)(b) This condition establishes a BACT requirement for good combustion practices, including proper operation and maintenance of the emergency equipment (EU-3) in accordance with manufacturer specifications. These practices ensure emissions do not exceed permitted limits.

(B)(3)(c)-(d) DWEE understands that readiness testing for an emergency generator (EU-3) typically takes between 30 minutes and four (4) hours per engine. The timeframe in Condition III.(C)(3)(c) allows sufficient time for testing, as well as for limited operation under non-emergency conditions.

The limitation on non-emergency operating hours in Condition III.(C)(3)(d) is consistent with EPA guidance in the March 1, 2011 memorandum from Tyler Fox titled *"Additional Clarification Regarding Application of Appendix W Modeling Guidance for the 1-hour NO_2 National Ambient Air Quality Standard."* This guidance distinguishes between scheduled and unscheduled intermittent emissions and supports restricting testing to certain hours to reduce impacts on ambient NO_2 levels.

> "Another aspect of intermittent emissions worth noting is the distinction between intermittent emissions that can be scheduled with some degree of flexibility vs. intermittent emissions that cannot be scheduled. For example, a portion of emissions from an emergency generator are likely to be associated with regular testing of the equipment that may be required to ensure its reliable operation, while that portion of emergency generator emissions associated with actual emergency use typically cannot be scheduled. In this case it may be appropriate to include a permit condition that restricts operation of the emergency generator during testing certain hours of the day, which may mitigate that source's contribution to ambient NO_2 levels based on dispersion conditions."

In establishing these limits, DWEE also considered meteorological conditions. Restricting non-emergency operation to between 11:00 AM and 4:00 PM takes advantage of peak convective dispersion, which helps minimize ground-level NO_2 concentrations from the emergency engine.

(B)(3)(f) This condition requires daily visible emissions observations of the engine stack during daylight hours and under normal operation on days when the engine operates. Any visible emissions observed during normal operation constitute a deviation and must be reported accordingly.

Insignificant Activities

The following table contains a description of insignificant activities at the source at the time of permit issuance, in accordance with operating permit application, 24R1-043, received December 4, 2024, including any supporting information received prior to issuance of the permit:

Insignificant Activity ID	Unit Description	Insignificance Criteria
Tank	Diesel tank, maximum capacity: 1,000 gallons; installed 2003	Annual Fuel Throughput for Entire Facility < 1,000,000 Gallons
Dew Point Heater	Dewpoint Heater, maximum capacity 6.86 MMBtu/hr, natural gas; installed in 2002	< 8 MMBtu/hr heat input capacity

Although not required, DWEE recommends that the source submit a written notification to DWEE if there are additions or changes to the list of insignificant activities identified above, containing the following suggested information:

- A brief description of the addition or change within the permitted source;
- The date on which the addition or change occurred;
- Any change in potential emissions; and
- The criteria, as defined the in Operating Permit Application Forms, used to determine that the addition or change to the list of insignificant activities qualifies as insignificant.

This notification helps the DWEE keep an up to date list on file for compliance purposes.

The following terms and conditions from the construction permit(s) listed were not incorporated into this permit, or have been modified as discussed below:

Permit Number and Issuance Date	Specific Condition	Reason Modified or Not Included In Operating Permit
CP24-038, issued July 23, 2025	III.(B)(1) through (B)(5)	Equipment has not yet been constructed. The equipment is included in construction permit CP26-005, which covers both modifications to existing stationary combustion turbines (natural gas burners EU CT-1/EP 1-1 and EU CT-2/EP 2-1) and the addition of new units (EU CT-3/EP 4-1, EU CT-4/EP 5-1, and EU CT-5/EP 6-1).
CP24-038, issued July 23, 2025	III.(C)(1)(a)	Modified; EU EMG and EU FP are neither constructed nor included in this permitting action.
	III.(C)(2)(a)	Removed; EP7-1, EP8-1 are neither constructed nor included in this permitting action.
	III.(C)(2)(b)	Modified; EU EMG and EU FP are neither constructed nor included in this permitting action.
	III.(C)(3)(a)	Modified; EU EMG and EU FP are neither constructed nor included in this permitting action.
	III.(C)(3)(b)	Modified; EU EMG and EU FP are neither constructed nor included in this permitting action.
	III.(C)(3)(c)	Modified; EU EMG and EU FP are not constructed nor are included in this permitting action. Removed; EU-3 has been in operation since 2002; therefore, the condition stating, "At no time during the first eleven (11) months after commencement of operations shall the total operating hours of each of the emission units identified in Condition III.(C)(1) exceed 500 hours," has been removed.
	III.(C)(3)(d)	Modified; EU EMG and EU FP are not constructed nor are included in this permitting action. Removed; EU-3 has been in operation since 2002; therefore, the condition stating, "At no time during the first eleven (11) months after commencement of operations shall the total operating hours of each of the emission units identified in Condition III.(C)(1) exceed 100 hours," has been removed.
	III.(C)(3)(e)	Modified; EU EMG and EU FP are not constructed nor are included in this permitting action. Removed; the portion of the condition stating "and limitations as specified in 40 CFR Part 60 NSPS Subparts A and IIII" because only EU-3 is installed and operating, and it is not subject to those subparts.
	III.(C)(4)(a)	Removed; EU EMG and EU FP are neither constructed nor included in this permitting action.
	III.(C)(5)(a)	Modified; EU EMG and EU FP are not constructed nor are included in this permitting action.

Permit Number and Issuance Date	Specific Condition	Reason Modified or Not Included In Operating Permit
	III.(C)(5)(b)	Modified; EU EMG and EU FP are not constructed nor are included in this permitting action.
	III.(C)(5)(c)	Modified; EU EMG and EU FP are not constructed nor are included in this permitting action.
	III.(C)(5)(d)	Modified; EU EMG and EU FP are not constructed nor are included in this permitting action; thus 40 CFR Part 60 Subparts A and IIII are not applicable.
CP24-038, issued July 23, 2025	III.(D)(1) through (D)(5)	Equipment has not yet been constructed. The equipment is included in construction permit CP26-005, which covers both modifications to existing stationary combustion turbines (natural gas burners EU CT-1/EP 1-1 and EU CT-2/EP 2-1) and the addition of new units (EU CT-3/EP 4-1, EU CT-4/EP 5-1, and EU CT-5/EP 6-1).
CP24-038, issued July 23, 2025	III.(E)(1) through (E)(5)	Equipment has not yet been constructed. The equipment is included in construction permit CP26-005, which covers both modifications to existing stationary combustion turbines (natural gas burners EU CT-1/EP 1-1 and EU CT-2/EP 2-1) and the addition of new units (EU CT-3/EP 4-1, EU CT-4/EP 5-1, and EU CT-5/EP 6-1).
CP24-038, issued July 23, 2025	III.(F)(1) through (F)(5)	Equipment has not yet been constructed. The equipment is included in construction permit CP26-005, which covers both modifications to existing stationary combustion turbines (natural gas burners EU CT-1/EP 1-1 and EU CT-2/EP 2-1) and the addition of new units (EU CT-3/EP 4-1, EU CT-4/EP 5-1, and EU CT-5/EP 6-1).
CP24-038, issued July 23, 2025	III.(G)(1) through (G)(5)	Equipment has not yet been constructed. The equipment is included in construction permit CP26-005, which covers both modifications to existing stationary combustion turbines (natural gas burners EU CT-1/EP 1-1 and EU CT-2/EP 2-1) and the addition of new units (EU CT-3/EP 4-1, EU CT-4/EP 5-1, and EU CT-5/EP 6-1).
CP26-005, issued July 2, 2026	III.(A)(2)(b) III.(A)(2)(b)(i) III.(A)(2)(c) III.(A)(2)(d)	Removed; This CP condition was not included in this OP because the requirements are for initial performance testing which was completed and test results submitted to the DWEE on August 7, 2003.
CP26-005, issued July 2, 2026	III.(A)(3)(e)(ii)	Removed; the following note explains removing this CP condition. The CP condition referenced “the variable load testing as described in CP26-005 Condition III.(A)(2)(b)”; however, because this permit does not incorporate the initial testing requirements of that permit, the Acid Rain regulation that requires the subsequent variable load testing has been referenced instead. Lastly, Condition III.(A)(3)(e)(ii) of CP26-005 was removed from this permit; the condition was descriptive as written. The source requested a language revision in the previous OPSP-0356 issued July 15, 2005 to state that the load will vary depending on NOx testing, which is also descriptive and therefore, not necessary to include.

Permit Number and Issuance Date	Specific Condition	Reason Modified or Not Included In Operating Permit
CP26-005, issued July 2, 2026	III.(H)(1) through (H)(5)	Removed; Equipment has not yet been constructed. The equipment is included in construction permit CP26-005, which covers both modifications to existing stationary combustion turbines (natural gas burners EU CT-1/EP 1-1 and EU CT-2/EP 2-1) and the addition of new units (EU CT-3/EP 4-1, EU CT-4/EP 5-1, and EU CT-5/EP 6-1).

Fact Sheet Attachment

Source-Wide Potential to Emit (PTE)

Regulated Pollutant	Source-Wide PTE Tons per Year (tpy)
Particulate Matter (PM)	34.67
PM smaller than or equal to 10 microns (PM_{10})	34.67
PM smaller than or equal to 2.5 microns ($PM_{2.5}$)	34.60
Oxides of Sulfur (SO_x)	3.60
Nitrogen Oxides (NO_x)	315.86
Carbon Monoxide (CO)	140.45
Volatile Organic Compounds (VOC)	7.71
Greenhouse Gases (GHGs): Mass Basis	496,441
GHGs: CO_2 equivalent (CO_2e) Basis	496,974
Hazardous Air Pollutants	
1,3 Butadiene	1.92E-03
Acetaldehyde	1.82E-01
Acrolein	2.90E-02
Aresenic	5.89E-06
Benzene	5.76E-02
Beryllium	3.53E-07
Cadmium	3.24E-05
Chromium	4.12E-05
Cobalt	2.47E-06
Cumene	1.72E-06
Dichlorobenzene	3.53E-05
Ethylbenzene	1.43E-01
Formaldehyde	3.18
Hexane	5.30E-02
Hexane (n-)	1.91E-06
Lead	1.47E-05
Manganese	1.12E-05
Mercury	7.66E-06
Napthalene	5.84E-03
Nickel	6.19E-05
PAH	1.05E-02
Propylene Oxide	1.30E-01
Selenium	7.07E-07
Toluene	5.84E-01
Total POM	2.60E-06
Xylene	2.88E-01
Total Hazardous Air Pollutants	4.67

Fact Sheet Attachment

Natural Gas Turbines: EP 1-1, EP 2-1

Natural Gas Turbines					
Fuel :	Natural Gas	Maximum Fuel Consumption per Turbine as limited by the permit (MMBtu/hr) :	2,065	Heat Input Rate (MMBtu/yr) / Maximum Fuel capacity (MMBtu/hr) * Two Turbines = Combined Turbine Hours of Operation (hr/yr) :	4,334
Fuel Sulfur Content [1] (%) :	0.80				
Power per Turbine :	173 MW	Heat Input Rate per Turbine as limited by the permit [2] (MMBtu/yr):	4,475,000		

Criteria Pollutant	Emission Factor	Emission Factor Unit	Emission Factor Source	Emission Rate for One Turbine (lb/hr)	Combined PTE of the Two Turbines (ton/yr)
PM (filterable) [7]	-	-	CP application [3]	15.30	33.16
PM_{10} (filterable) [7]	-	-	Permit Limit	15.30	33.16
$PM_{2.5}$	-	-	CEIDARS [4]	15.27	33.09
SO_x	-	-	CP application [3]	1.10	2.38
NO_x	-	-	Permit Limit	136.00	294.72
CO	-	-	Permit Limit	63.00	136.53
VOC	-	-	CP application [3]	2.80	6.07
Hazardous Air Pollutants	**Emission Factor**	**Emission Factor Unit**	**Emission Factor Source [5]**	**Emission Rate for One Turbine [6] (lb/hr)**	**Combined PTE of the Two Turbines (ton/yr)**
1,3 Butadiene	4.3E-07	lb/MMBtu	Table 3.1-3	8.9E-04	1.92E-03
Acetaldehyde	4.0E-05	lb/MMBtu	Table 3.1-3	8.3E-02	1.79E-01
Acrolein	6.4E-06	lb/MMBtu	Table 3.1-3	1.3E-02	2.86E-02
Benzene	1.2E-05	lb/MMBtu	Table 3.1-3	2.5E-02	5.37E-02
Ethylbenzene	3.2E-05	lb/MMBtu	Table 3.1-3	6.6E-02	1.43E-01
Formaldehyde	7.1E-04	lb/MMBtu	Table 3.1-3	1.5E+00	3.18
Napthalene	1.3E-06	lb/MMBtu	Table 3.1-3	2.7E-03	5.82E-03
PAH	2.2E-06	lb/MMBtu	Table 3.1-3	4.5E-03	9.85E-03
Propylene Oxide	2.9E-05	lb/MMBtu	Table 3.1-3	6.0E-02	1.30E-01
Toluene	1.3E-04	lb/MMBtu	Table 3.1-3	2.7E-01	5.82E-01
Xylenes	6.4E-05	lb/MMBtu	Table 3.1-3	1.3E-01	2.86E-01
Total HAPs	-	-	-	-	4.60
Greenhouse Gases	**Emission Factor**	**Emission Factor Unit**	**Emission Factor Source [5]**	**Emission Rate for One Turbine [6] (lb/hr)**	**Combined PTE of the Two Turbines (ton/yr)**
CO_2	110	lb/MMBtu	Table 3.1-2a	227,150.00	492,250.00
CH_4	2.2E-03	lb/MMBtu	Table C-2	4.55	9.87
N_2O	2.2E-04	lb/MMBtu	Table C-2	0.46	0.99
GHGs (mass basis)	-	-	-	227,155.01	492,260.85
CO_2e basis	-	-	40 CFR 98,[8] Table A-1	227,398.11	492,787.67

[1] As required by CP26-005, and carried forward in this OP.

[2] Note that the combined restricted heat input rate is 8,950,000 as limited by CP26-005 and carried forward in this OP. For ease of these calculations, this limit is divided by two and listed as a per turbine basis.

[3] Emission factors from the CP application submitted on September 6, 2000; based on manufaturer data, ISO conditions and BASE load.

[4] Emission factor derived by using CEIDARS Appendix A for "Internal Combustion- Gaseous Fuel", $PM_{2.5}$ fraction of PM_{10} scaling factor.

[5] EPA's AP-42, Fifth Edition, *Compilation of Air Pollutant Emission Factors* , Volume 1, Chapter 3.1- Stationary Gas Turbines (April 2000) for CO_2, 40 CFR 98 for CH_4 and N_2O

[6] Emission Rate for One Turbine (lb/hr) = Emission Factor (lb/MMBtu) * Maximum Fuel Consumption per Turbine (MMBtu/hr)

[7] It is assumed that PM and PM_{10} are filterable because CP26-005 required EPA Test Method 5 to test particulate matter.

[8] Title 129, Chapter 1, Section 002.47; Table A-1 to Subpart A of Part 98 (Tons CO_2e/yr = (tons/yr) x (CO_2e conversion factor); CO_2 equivalents are found in 40 CFR Part 98 Subpart A Table A-1 "Global Warming Potentials" as published at 89 Federal Register 31894 April 25, 2024, effective on January 1, 2025. CO_2=1, N_2O=265, CH_4=28)

Fact Sheet Attachment

Diesel Fuel Engine- EP 3-1

Diesel Engines < 600 HP						
Fuel:	Diesel	Engine Power [1]:		134 hp	Maximum Hours of Operation (hr/yr):	8,760
Sulfur Content [1] (%):	0.04	Heating Value [2] (Btu/gal):		137,000	Maximum Fuel Rate [1] (gal/hr):	6.8
Pollutant		**Emission Factor**	**Emission Factor Unit**	**Emission Factor Source [3]**	**Emission Rate (lb/hr)**	**PTE (ton/yr)**
PM		2.2E-03	lb/hp-hr	Table 3.3-1	0.29	1.29
PM_{10}		2.2E-03	lb/hp-hr	Table 3.3-1	0.29	1.29
$PM_{2.5}$		2.2E-03	lb/hp-hr	Table 3.3-1	0.29	1.29
SO_x		2.05E-03	lb/hp-hr	Table 3.3-1	0.27	1.20
NO_x		3.10E-02	lb/hp-hr	Table 3.3-1	4.15	18.19
CO		6.68E-03	lb/hp-hr	Table 3.3-1	0.90	3.92
VOC [4]		2.51E-03	lb/hp-hr	Table 3.3-1	0.34	1.48
Individual HAPs		**Emission Factor**	**Emission Factor Unit**	**Emission Factor Source [3]**	**Emission Rate [5] (lb/hr)**	**PTE (ton/yr)**
Acetaldehyde		7.67E-04	lb/MMBtu	Table 3.3-2	7.15E-04	3.13E-03
Acrolein		9.25E-05	lb/MMBtu	Table 3.3-2	8.62E-05	3.77E-04
Benzene		9.33E-04	lb/MMBtu	Table 3.3-2	8.69E-04	3.81E-03
Formaldehyde		1.18E-03	lb/MMBtu	Table 3.3-2	1.10E-03	4.81E-03
Toluene		4.09E-04	lb/MMBtu	Table 3.3-2	3.81E-04	1.67E-03
Total PAH		1.68E-04	lb/MMBtu	Table 3.3-2	1.57E-04	6.86E-04
Xylene		2.85E-04	lb/MMBtu	Table 3.3-2	2.66E-04	1.16E-03
Total HAPs		3.83E-03	lb/MMBtu	-	3.57E-03	1.56E-02
Greenhouse Gases		**Emission Factor**	**Emission Factor Unit**	**Emission Factor Source [6]**	**Emission Rate [7] (lb/hr)**	**PTE (ton/yr)**
CO_2		73.96	kg/MMBtu	Table C-1	151.90	665.32
CH_4		3.00E-03	kg/MMBtu	Table C-2	0.01	0.03
N_2O		6.00E-04	kg/MMBtu	Table C-2	0.00	0.01
GHGs (mass basis)		-	-	-	151.91	665.35
CO_2e basis		-	-	Table C-1, C-2, A-1	152.40	667.51

[1] Information provided by the applicant

[2] AP-42 Appendix A - Miscellaneous Data and Conversion Factors, page A-5 (September 1985)

[3] AP-42 Section 3.3 - Gasoline and Diesel Industrial Engines (October 1996)

[4] VOC as total organic compounds (TOC)

[5] Emission Rate (lb/hr) = (Emission Factor (lb/MMBtu) * Heating Value (Btu/gal) * Max Fuel Rate (gal/hr)) / 1,000,000

[6] Title 129, Chapter 1, Section 002.47; Table A-1 to Subpart A of Part 98 (Tons CO2e/yr = (tons/yr) x (CO_2e conversion factor); CO_2 equivalents are found in 40 CFR Part 98 Subpart A Table A-1 "Global Warming Potentials" as published at 89 Federal Register 31894 April 25, 2024, effective on January 1, 2025. CO_2=1, N_2O=265, CH_4=28)

[7] Emission Rate (lb/hr) = (Emission Factor (kg/MMBtu) * Heating Value (Btu/gal) * Max Fuel Rate (gal/hr) * (2.2046 lb/1-kg)) / 1,000,000

Fact Sheet Attachment

Insignificant Activity: Dewpoint Heater: EP-DPH1

Emission Point ID#	Emission Unit ID#	Description	Fuel Capacity MMscf/yr	Heat Input MMBtu/hr	Fuel Type
EP-DPH1	EU-DPH1	Dewpoint Heater #1	58.92	6.86	Natural Gas

Heat Content[1]	1,020	Btu/scf
Total Heat Input	6.86	MMBtu/hr
Total Fuel Capacity	58.92	MMscf/yr
	6.73E-03	MMscf/hr
Operating Hours	8,760	hr/yr

Pollutant	Emission Factor[2]	Unit	Potential Emissions lb/hr	Potential Emissions tpy
PM	7.6	lb/MMscf	0.05	0.22
PM_{10}	7.6	lb/MMscf	0.05	0.22
$PM_{2.5}$	7.6	lb/MMscf	0.05	0.22
NO_X	100	lb/MMscf	0.67	2.95
SO_X	0.6	lb/MMscf	4.04E-03	0.02
CO	84	lb/MMscf	0.56	2.47
VOC	5.5	lb/MMscf	0.04	0.16
Hazardous Air Pollutants (HAPs)[3]				
Benzene	2.1E-03	lb/MMscf	1.41E-05	6.19E-05
Dichlorobenzene	1.2E-03	lb/MMscf	8.07E-06	3.53E-05
Formaldehyde	7.5E-02	lb/MMscf	5.04E-04	2.21E-03
Hexane	1.8	lb/MMscf	1.21E-02	0.05
Naphthalene	6.1E-04	lb/MMscf	4.10E-06	1.80E-05
Toluene	3.4E-03	lb/MMscf	2.29E-05	1.00E-04
Total POM[4]	8.8E-05	lb/MMscf	5.93E-07	2.60E-06
Aresenic	2.0E-04	lb/MMscf	1.35E-06	5.89E-06
Beryllium	1.2E-05	lb/MMscf	8.07E-08	3.53E-07
Cadmium	1.1E-03	lb/MMscf	7.40E-06	3.24E-05
Chromium	1.4E-03	lb/MMscf	9.42E-06	4.12E-05
Cobalt	8.4E-05	lb/MMscf	5.65E-07	2.47E-06
Lead	5.0E-04	lb/MMscf	3.36E-06	1.47E-05
Manganese	3.8E-04	lb/MMscf	2.56E-06	1.12E-05
Mercury	2.6E-04	lb/MMscf	1.75E-06	7.66E-06
Nickel	2.1E-03	lb/MMscf	1.41E-05	6.19E-05
Selenium	2.4E-05	lb/MMscf	1.61E-07	7.07E-07
		Total HAPs	0.01	0.06
Greenhouse Gas Emissions (GHGs)[5]				
CO_2	53.06	kg/MMBtu	802.46	3,514.79
CH_4	1.00E-03	kg/MMBtu	1.51E-02	6.62E-02
N_2O	1.00E-04	kg/MMBtu	1.51E-03	6.62E-03
		Total GHGs (mass basis)	802.48	3,514.86
		Total GHGs (CO_2e basis)[6]	803.29	3,518.40

[1] AP-42 Table 1.4-2 (April 2026) footnote 'a' conversion factor 1,020 btu/scf.

[2] Emission factors from AP-42 Table 1.4-1 for small uncontrolled units and Table 1.4-2 (July 1998).

[3] Emission factors from AP-42 Tables 1.4-2, 1.4-3, and 1.4-4 (July 1998).

[4] Polycyclic Organic Matter (also knowns as PAH - Polycyclic Aromatic Hydrocarbons).

[5] Emission factors from 40 CFR 98 Table C-1 (December 2016) and Table C-2 for Natural Gas (May 2024).

[6] Title 129, Chapter 1, Section 002.47; Table A-1 to Subpart A of Part 98 (Tons CO_2e/yr = (tons/yr) x (CO_2e conversion factor); CO_2 equivalents are found in 40 CFR Part 98 Subpart A Table A-1 "Global Warming Potentials" as published at 89 Federal Register 31894 April 25, 2024, effective on January 1, 2025. CO_2=1, N_2O=265, CH_4=28)

Polycyclic Organic Matter (POM)	Emission Rate lb/MMscf
2-Methylnaphthalene	2.4E-05
3-Methylcholanthrene	1.8E-06
7,12- Dimethylbenz(a)an	1.6E-05
Acenaphthene	1.8E-06
Acenaphthylene	1.8E-06
Anthracene	2.4E-06
Benz(a)anthracene	1.8E-06
Benzo(a)pyrene	1.2E-06
Benzo(b)fluoranthene	1.8E-06
Benzo(g,h,i)perylene	1.2E-06
Benzo(k)fluoranthene	1.8E-06
Chrysene	1.8E-06
Dibenzo(a,h)anthracene	1.2E-06
Fluoranthene	3.0E-06
Fluorene	2.8E-06
Indeno(1,2,3-cd)pyrene	1.8E-06
Phenanathrene	1.7E-05
Pyrene	5.0E-06
Total POM	8.8E-05

Fact Sheet Attachment

Insignificant Activity: Tank: EP-TANK

Tank ID	Description	Tank Capacity	Throughput	VOC Emission Rate[1]	
		gal	gal/yr	lb/yr	tpy
EU-TANK	Existing Diesel Tank	1,000	63,254	1.15	5.73E-04

[1] Tank VOC emission rate based on EPA TANKS 5.2 program.

HAP	Mass Fraction[1]	Tank Emissions	
		lb/yr	tpy
Benzene	4.83E-03	0.01	2.77E-06
Cumene	3.00E-03	0.00	1.72E-06
Ethylbenzene	3.33E-03	0.00	1.91E-06
Hexane (n-)	3.33E-03	0.00	1.91E-06
Napthalene	8.67E-03	0.01	4.97E-06
Toluene	3.33E-03	0.00	1.91E-06
Xylene	6.33E-03	0.01	3.63E-06
Total HAPs		0.04	1.88E-05

[1] DWEE Standard Values.

Fact Sheet Attachment

Title 129, Chapter 15 Calculations

Title 129, Chapter 15, Section 001 **Particulate Emissions from Combustion Sources**

Total Heat Input (MMBtu/hr)	Maximum Allowable Emissions of PM (lb/MMBtu)
10 or less	0.6
Between 10 and 10,000	1.026/I^0.233
	Where I = total heat input in MMBtu/hr
10,000 or more	0.12

Emission Point (EP)	EP horsepower	EP MMBtu/hr [1]	Maximum Allowable PM (lb/MMBtu)	Maximum Allowable PM (lb/hr) [2]	Maximum Allowable PM Limit in CP26-005 [3] (lb/MMBtu)	EP PM emission rate (lb/hr)	EP PM emission rate (lb/MMBtu) [4]
EP 1-1	-	2065	0.173288997	-	0.12	15.30	0.007409201
EP 2-1	-	2065	0.173288997	-	0.12	15.30	0.007409201
EP 3-1	134	0.938	0.6	0.5628	-	0.29	-

[1] To convert hp to MMBtu/hr: hp * (7,000 Btu / 1 hp-hr) * (1 MMBtu / 1,000,000 Btu)

[2] Maximum Allowable PM (lb/hr) = Maximum Allowable PM (lb/MMBtu) * (EP MMBtu/hr)

[3] Though the calculations of Maximum Allowable PM in the prior two columns differ from the PM limit stated in CP24-038 (issued July 23,2025), the CP limit is an applicable requirement and must be retained in this OP. Compliance with the CP limit is expected as demonstrated with the potential emissions calculations in the last two columns of this table. The PM limit of 0.17 lb/MMBtu will not be included in this OP because under Title 129, Chapter 15, Section 001.06, only the more stringent limit must be included in the permit.

[4] To convert the lb/hr emission rate to lb/MMBtu, divide by the EP MMBtu/hr.