

December 5, 2025

John Pasquarette  
Ohio EPA – Division of Air Pollution Control  
Northwest District Office  
347 N. Dunbridge Road  
Bowling Green, Ohio 43402

*RE: Request for Approval of Site Preparation Activities – Apollo  
Will-Power OH LLC – Wood County, OH*

Dear John Pasquarette:

Will-Power OH LLC (Will-Power) is submitting this application for a Permit to Install (PTI) to authorize the installation and operation of an electric generating station in Bowling Green, OH (Apollo, Facility ID 0387022027).

As described in the application, the proposed project will not meet the definition of a major stationary source, and Will-Power has not requested any synthetic minor limitations to avoid these classifications. Therefore, pending Ohio EPA's determination that the application is administratively complete, Will-Power hereby notifies Ohio EPA that the following site preparation activities will occur at Apollo prior to the receipt of a final PTI in accordance with Ohio Administrative Code (OAC) 3745-31-33(F).

- ▶ Installing electrical service for air contaminant sources and air pollution control equipment up to the service panel for the new equipment;
- ▶ Installing piping and sewers up to the point of connection to any air contaminant sources or air pollution control equipment;
- ▶ Installing inlet air and exhaust duct work with the exception of final connections to the air contaminant sources and air pollution control equipment;
- ▶ Installing concrete footers, foundations, pads, and platforms for the buildings or for equipment;
- ▶ Installing permanent roadways and parking areas not requiring a PTI;
- ▶ Storing parts and equipment of the air contaminant sources and air pollution control equipment;
- ▶ Construction of new or expanded buildings or the renovation or upgrading of existing buildings in preparation for the installation of new or modified air contaminant sources and air pollution control equipment; and
- ▶ Delivery of components of the air contaminant sources and air pollution control equipment. As described in OAC 3745-31-33(F)(8)(a) and (b), equipment to be installed in existing buildings may be secured in its final location, and equipment to be installed in buildings yet to be constructed may be secured in its final location or located anywhere on the property. Will-Power will not operate the equipment or connect utilities, piping, or duct work to the equipment until the PTI has been issued.

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John Pasquarette – Page 2  
December 5, 2025

Will-Power appreciates Ohio EPA's consideration of these proposed site preparation activities. If you have any questions or comments about the information presented in this letter, please do not hesitate to contact Andy Woerner at (610) 412-8905.

Sincerely,

WILL-POWER OH LLC

Andy Woerner  
Senior Environmental Specialist

# PERMIT TO INSTALL APPLICATION

**Will-Power OH LLC / Bowling Green, OH**

**Apollo**

**Prepared By:**

**TRINITY CONSULTANTS**

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December 2025

Project 253601.0144



## TABLE OF CONTENTS

|                                                                                                                  |            |
|------------------------------------------------------------------------------------------------------------------|------------|
| <b>1. APPLICATION OVERVIEW</b>                                                                                   | <b>1-1</b> |
| 1.1 Facility Location .....                                                                                      | 1-1        |
| 1.2 Project Description .....                                                                                    | 1-2        |
| 1.3 Proposed Voluntary Restrictions.....                                                                         | 1-2        |
| 1.4 Proposed Project Emissions .....                                                                             | 1-3        |
| <b>2. REGULATORY APPLICABILITY</b>                                                                               | <b>2-1</b> |
| 2.1 Federal Permitting Applicability.....                                                                        | 2-1        |
| 2.1.1 Prevention of Significant Deterioration (PSD) & Nonattainment New Source Review (NANSR) Applicability..... | 2-1        |
| 2.1.2 Title V Operating Permit Program Applicability .....                                                       | 2-1        |
| 2.2 New Source Performance Standards .....                                                                       | 2-2        |
| 2.2.1 40 CFR Part 60, Subpart IIII – Compression Ignition Internal Combustion Engines .....                      | 2-2        |
| 2.2.2 40 CFR Part 60, Subpart JJJJ – Spark Ignition Internal Combustion Engines.....                             | 2-2        |
| 2.2.3 40 CFR Part 60, Subpart KKKK – Stationary Combustion Turbines.....                                         | 2-2        |
| 2.2.4 40 CFR Part 60, Subpart KKKKa – Stationary Combustion Turbines.....                                        | 2-3        |
| 2.2.5 40 CFR Part 60, Subpart TTTTa – Stationary Combustion Turbines.....                                        | 2-3        |
| 2.3 National Emission Standards for Hazardous Air Pollutants .....                                               | 2-3        |
| 2.3.1 40 CFR Part 63, Subpart YYYY – Stationary Combustion Turbines.....                                         | 2-3        |
| 2.3.2 40 CFR Part 63, Subpart ZZZZ – Reciprocating Internal Combustion Engines.....                              | 2-4        |
| 2.3.3 40 CFR 63, Subpart DDDDD – Boilers and Process Heaters .....                                               | 2-4        |
| 2.3.4 40 CFR 63, Subpart UUUUU – Coal and Oil-Fired Electric Utility Steam Generating Units.....                 | 2-4        |
| 2.4 Cross State Air Pollution Rule .....                                                                         | 2-4        |
| 2.5 Acid Rain Programs.....                                                                                      | 2-4        |
| 2.6 Risk Management Plan .....                                                                                   | 2-5        |
| 2.7 State of Ohio Regulatory Applicability .....                                                                 | 2-5        |
| 2.7.1 OAC 3745-14 – NO <sub>x</sub> Budget Trading.....                                                          | 2-5        |
| 2.7.2 OAC 3745-17-07 – Control of Visible Emissions from Stationary Sources .....                                | 2-5        |
| 2.7.3 OAC 3745-17-10 – Restrictions on Particulate Emissions from Fuel Burning Equipment ..                      | 2-5        |
| 2.7.4 OAC 3745-17-11 – Restrictions on Particulate Emissions from Industrial Processes .....                     | 2-6        |
| 2.7.5 OAC 3745-18-06 – Restrictions on Sulfur Dioxide Emissions .....                                            | 2-6        |
| 2.7.6 OAC 3745-103 – Acid Rain Permits.....                                                                      | 2-6        |
| 2.7.7 OAC 3745-110-03 – Nitrogen Oxides – Reasonably Available Control Technology .....                          | 2-6        |
| <b>3. BEST AVAILABLE TECHNOLOGY REVIEW</b>                                                                       | <b>3-1</b> |
| <b>4. OHIO MODELING REQUIREMENTS</b>                                                                             | <b>4-1</b> |
| 4.1 Criteria Pollutant Modeling Analysis.....                                                                    | 4-1        |
| 4.2 Air Toxics Modeling Analysis.....                                                                            | 4-2        |
| <b>APPENDIX A. PTE CALCULATIONS</b>                                                                              | <b>A-1</b> |

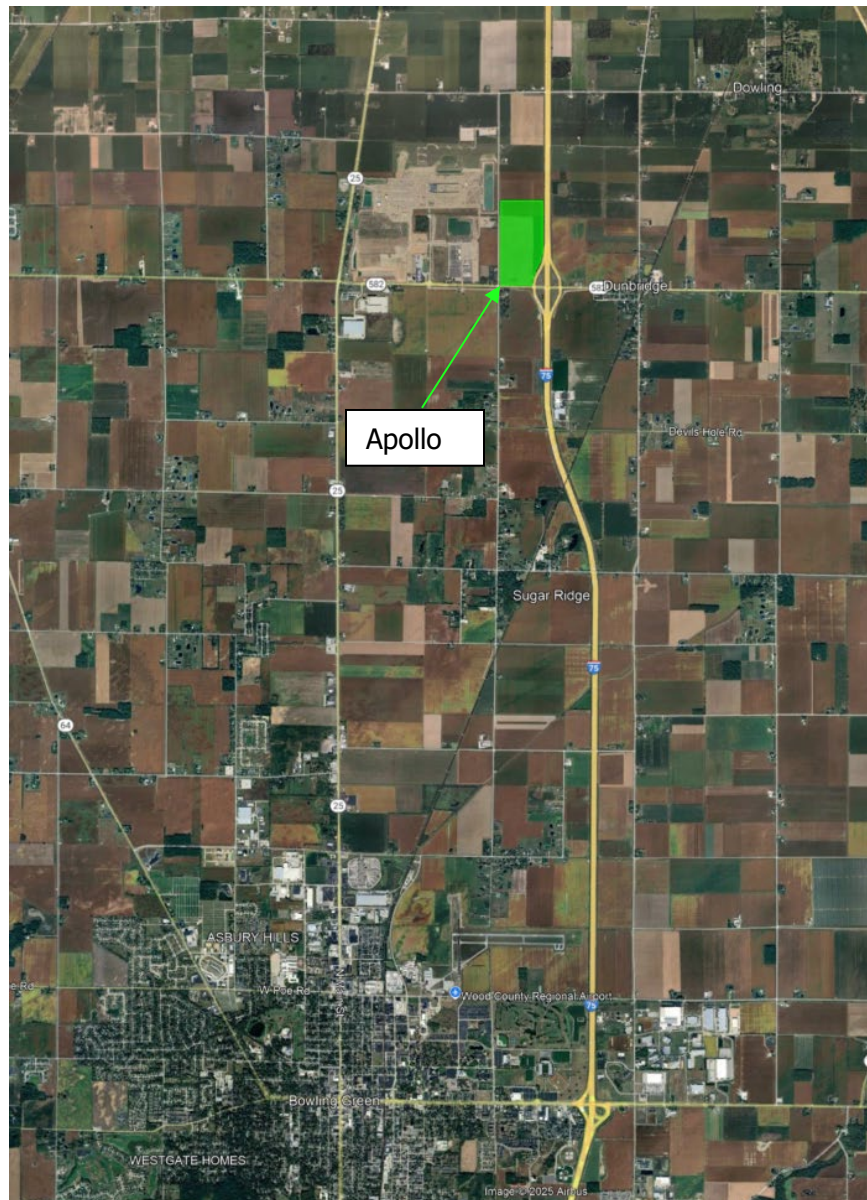
## 1. APPLICATION OVERVIEW

With this Permit to Install (PTI) application, Will-Power OH LLC (Will-Power) is requesting approval for the installation and subsequent operation of an electric generating station in Bowling Green, OH (Apollo). Apollo will provide electric power exclusively and directly to an adjacent customer.

### 1.1 Facility Location

Apollo will be located in Wood County, near Bowling Green, Ohio. Figure 1-1 is an area map that shows the site location relative to predominant geographical features such as highways and railroads.

**Figure 1-1. Area Map for Apollo**



## 1.2 Project Description

Will-Power is requesting issuance of a Permit to Install (PTI) for each of the following emission units. Each of the units is listed with its proposed Ohio EPA Emission Unit Identification Number (EUID).

- ▶ Generator Engines #1 through #6 (P001-P006) – Six (6) Caterpillar G3520 natural gas-fired 4-stroke lean-burn reciprocating engines each rated at 2,500 kilowatts (kW) and each equipped with an oxidation catalyst and selective catalytic reduction (SCR) system.
- ▶ Generator Turbines #1 through #6 (P007-P012) – Six (6) Solar Titan 130 natural gas-fired turbines each rated at 17 megawatts (MW) and each equipped with an oxidation catalyst and SCR system.
- ▶ Generator Turbines #7 through #9 (P013-P015) – Three (3) Siemens SGT-A35 natural gas-fired turbines each rated at 33 MW and each equipped with an oxidation catalyst and SCR system.
- ▶ Generator Turbines #10 through #15 (P016-P021) – Six (6) Siemens SGT400 natural gas-fired turbines each rated at 15 MW and each equipped with an oxidation catalyst and SCR system.
- ▶ Generator Turbines #16 through #17 (P022-P023) – Two (2) Siemens SGT800 natural gas-fired turbines each rated at 68 MW and each equipped with an oxidation catalyst and SCR system.
- ▶ Generator Turbines #18 through #21 (P024-P027) – Four (4) Baker Hughes LT16 natural gas-fired turbines each rated at 18 MW and each equipped with an oxidation catalyst and SCR system.

Apollo will also include the following emissions sources that are either exempt from air permitting requirements or eligible for alternative authorizations as noted below.

- ▶ Line Heaters #1 through #22 (B001-B022) – Twenty-two (22) natural gas fired heaters rated at capacities ranging from 1.1 to 3.6 million British thermal units per hour (MMBtu/hr). Air contaminant emissions from each unit will be less than ten (10) pounds per day; therefore, these units qualify for the de minimis exemption in OAC 3745-15-05(B).
- ▶ Emergency Engines #1 through #2 (P028-P029) – Two (2) diesel-fired emergency engines each rated at 1,500 horsepower (hp). Will-Power will submit Permit-by-Rule (PBR) registrations for these emergency engines under separate cover.

## 1.3 Proposed Voluntary Restrictions

As described in Section 3 of this application, controlled emissions of nitrogen oxides (NO<sub>x</sub>), carbon monoxide (CO), and volatile organic compounds (VOC) from the following sources will be less than ten (10) tons per year (tpy) and are therefore exempt from the Ohio Environmental Protection Agency's (Ohio EPA's) Best Available Technology (BAT) program. In order to establish enforceable restrictions on potential emissions from these sources, Will-Power respectfully requests the following emission limitations under Ohio Administrative Code (OAC) 3745-31-05(F).

**Table 1-1. Proposed Voluntary Emission Limits**

| EU ID     | Emission Unit Description | Normal Operation<br>(lb/hr/unit) |      |      | Startup<br>(lb/event/unit) |       |       | Shutdown<br>(lb/event/unit) |       |       | Annual<br>(tpy/unit) |      |      |
|-----------|---------------------------|----------------------------------|------|------|----------------------------|-------|-------|-----------------------------|-------|-------|----------------------|------|------|
|           |                           | NO <sub>x</sub>                  | CO   | VOC  | NO <sub>x</sub>            | CO    | VOC   | NO <sub>x</sub>             | CO    | VOC   | NO <sub>x</sub>      | CO   | VOC  |
| P001-P006 | Generator Engines #1-6    | 0.74                             | 0.73 | 0.56 | 2.46                       | 3.45  | 0.51  | 2.46                        | 3.45  | 0.51  | 3.32                 | 3.31 | 2.45 |
| P007-P012 | Generator Turbines #1-6   | 1.24                             | 1.32 | 0.94 | 4.00                       | 64.00 | 12.00 | 4.00                        | 52.00 | 12.00 | 5.58                 | 8.10 | 4.57 |
| P013-P015 | Generator Turbines #7-9   | -                                | -    | 1.58 | -                          | -     | 12.00 | -                           | -     | 12.00 | -                    | -    | 7.37 |
| P016-P021 | Generator Turbines #10-15 | 1.04                             | 1.11 | 0.83 | 4.00                       | 64.00 | 12.00 | 4.00                        | 52.00 | 12.00 | 4.71                 | 7.17 | 4.09 |
| P024-P027 | Generator Turbines #18-21 | 1.45                             | 1.74 | 0.95 | 4.00                       | 64.00 | 12.00 | 4.00                        | 52.00 | 12.00 | 6.50                 | 9.92 | 4.65 |

## 1.4 Proposed Project Emissions

Table 1-2 provides a summary of the potential annual emissions attributable to the project, including particulate matter (filterable only), particulate matter with an aerodynamic diameter of less than 10 microns, and particulate matter with an aerodynamic diameter of less than 2.5 microns (PM/PM<sub>10</sub>/PM<sub>2.5</sub>); nitrogen oxides (NO<sub>x</sub>); sulfur dioxide (SO<sub>2</sub>); carbon monoxide (CO); volatile organic compounds (VOC); ammonia (NH<sub>3</sub>); total hazardous air pollutants (HAP); formaldehyde (HCHO, the highest single HAP emitted by the facility); and greenhouse gases expressed as carbon dioxide equivalents (CO<sub>2</sub>e). Detailed calculation documentation is provided in Appendix A.

**Table 1-2. Potential Emissions for Apollo**

| EU ID                    | Emission Unit Description | Project Annual Emissions (tpy) |               |                 |                                            |               |                 |              |              |                   |
|--------------------------|---------------------------|--------------------------------|---------------|-----------------|--------------------------------------------|---------------|-----------------|--------------|--------------|-------------------|
|                          |                           | NO <sub>x</sub>                | CO            | SO <sub>2</sub> | PM/PM <sub>10</sub> /<br>PM <sub>2.5</sub> | VOC           | NH <sub>3</sub> | HCHO         | Total HAP    | CO <sub>2</sub> e |
| P001-P006                | Generator Engines #1-6    | 19.94                          | 19.83         | 5.53            | 5.78                                       | 14.68         | 5.57            | 4.71         | 11.48        | 67,786            |
| P007-P012                | Generator Turbines #1-6   | 33.49                          | 48.58         | 43.16           | 29.82                                      | 27.42         | 78.55           | 0.98         | 1.86         | 529,130           |
| P013-P015                | Generator Turbines #7-9   | 30.95                          | 44.07         | 35.86           | 24.78                                      | 22.12         | 63.81           | 0.80         | 1.53         | 439,720           |
| P016-P021                | Generator Turbines #10-15 | 28.25                          | 43.00         | 36.84           | 25.46                                      | 24.52         | 64.96           | 2.77         | 3.52         | 451,741           |
| P022-P023                | Generator Turbines #16-17 | 31.67                          | 33.27         | 47.45           | 32.79                                      | 32.60         | 75.54           | 3.54         | 4.49         | 581,784           |
| P024-P027                | Generator Turbines #18-21 | 25.99                          | 39.70         | 31.50           | 21.77                                      | 18.58         | 47.28           | 0.71         | 1.35         | 386,204           |
| P028-P029                | Emergency Engines #1-2    | 9.87                           | 0.40          | 6.37E-05        | 0.07                                       | 0.05          | -               | 4.14E-04     | 0.01         | 859               |
| B001-B022                | Line Heaters #1-22        | 15.37                          | 12.91         | 0.09            | 1.17                                       | 0.85          | -               | 0.02         | 0.29         | 18,357            |
| <b>Facility-wide PTE</b> |                           | <b>195.53</b>                  | <b>241.75</b> | <b>200.43</b>   | <b>141.64</b>                              | <b>140.81</b> | <b>335.71</b>   | <b>13.54</b> | <b>24.52</b> | <b>2,475,581</b>  |

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## 2. REGULATORY APPLICABILITY

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This section presents information to either confirm non-applicability of or demonstrate compliance with potentially applicable federal and state air permitting and regulatory requirements.

### 2.1 Federal Permitting Applicability

#### 2.1.1 Prevention of Significant Deterioration (PSD) & Nonattainment New Source Review (NANSR) Applicability

The major New Source Review (NSR) program applies to major sources of criteria pollutants and involves either the Prevention of Significant Deterioration (PSD) or Nonattainment New Source Review (NANSR) depending on the attainment status of the airshed in which the project is occurring.

##### 2.1.1.1 PSD Applicability

The applicability of PSD is evaluated for proposed construction, reconstruction, and modification projects that result in an emission increase of a regulated NSR pollutant for which the area is in attainment with the National Ambient Air Quality Standards (NAAQS). Wood County has been designated "in attainment" or "unclassifiable" for all regulated NSR pollutants.<sup>1</sup> Because Apollo will not generate steam, the facility will not be considered a "fossil fuel fired steam electric plant" as listed in OAC 3745-31-01(M)(5)(b)(i) but will instead be subject to the general PSD major source threshold of 250 tpy provided in OAC 3745-31-01(M)(5)(b)(ii).

Will-Power and the customer have entered into a contractual agreement clarifying that Apollo and the adjacent customer are not "under the control of the same person" and are therefore separate stationary sources pursuant to OAC 3745-31-01(S)(10).

Table 1-2 in Section 1.4 of this application demonstrates that facility-wide potential emissions from Apollo for each of the NSR-regulated pollutants are all below the major source threshold of 250 tpy. Therefore, Will-Power is not subject to PSD review for the proposed project.

##### 2.1.1.2 NANSR Applicability

The applicability of NANSR is evaluated for proposed construction, reconstruction, and modification projects that result in an emission increase of a regulated NSR pollutant for which the area is not attaining the NAAQS. Because Wood County has been designated as "in attainment" or "unclassifiable" for all regulated NSR pollutants, NANSR does not apply to the proposed project.

#### 2.1.2 Title V Operating Permit Program Applicability

The Title V operating permit program consolidates state and federal requirements applicable to major sources into a single comprehensive operating permit for the purposes of facilitating ongoing compliance. In accordance with OAC 3745-77, sources with a potential to emit (PTE) of 100 tpy or more for criteria pollutants, 25 tpy or more for total HAP, or 10 tpy or more for any individual HAP are considered major sources for which applicants must obtain a Title V operating permit.

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<sup>1</sup> Attainment designations for Ohio counties are established in 40 C.F.R. § 81.336.

Will-Power will submit an application for a Title V operating permit within 12 months of commencing operation of Apollo.

## **2.2 New Source Performance Standards**

The federal New Source Performance Standards (NSPS) require new, modified, or reconstructed sources to control emissions to the level that is achievable by the best system of emissions reduction as specified in the provisions of the applicable rule. The following section of this application provides applicability determinations for each of the NSPS to which the new emission units are potentially subject.

In addition to the specific standards described below, Will-Power must also comply with the general provisions of Title 40, Code of Federal Regulations, Part 60 (40 CFR Part 60), Subpart A, which establish notification, recordkeeping, testing, monitoring, and reporting requirements for all sources subject to a particular NSPS.

### **2.2.1 40 CFR Part 60, Subpart IIII – Compression Ignition Internal Combustion Engines**

Affected sources under 40 CFR 60, Subpart IIII (NSPS IIII), include stationary compression ignition (CI) internal combustion engines (ICE) that commence construction after July 11, 2005, and that were manufactured after April 1, 2006. Emergency Engines P028-P029 will be subject to the requirements of NSPS IIII, as noted below.

In accordance with 40 CFR 60.4205(b), owners and operators of CI ICE must comply with the emission standards established in 40 CFR 60.4202 for all pollutants. Pursuant to 40 CFR 60.4211(c), Will-Power will utilize engines certified to comply with these emissions standards.

### **2.2.2 40 CFR Part 60, Subpart JJJJ – Spark Ignition Internal Combustion Engines**

Affected sources under 40 CFR 60, Subpart JJJJ (NSPS JJJJ), include stationary spark ignition (SI) internal combustion engines (ICE) that commence construction after June 12, 2006, and that were manufactured after July 1, 2007, for engines rated at a capacity greater than 500 hp. Generator Engines P001-P006 will be subject to the requirements of NSPS JJJJ, as noted below.

In accordance with 40 CFR 60.4233(e), owners and operators of SI ICE rated at capacities greater than 100 hp must comply with the emission standards established in Table 1 to NSPS JJJJ for all pollutants. Pursuant to 40 CFR 60.4243(b)(2)(ii), Will-Power must keep a maintenance plan and conduct an initial performance test as well as subsequent performance tests every 8,760 hours or three (3) years, whichever comes first to demonstrate compliance.

### **2.2.3 40 CFR Part 60, Subpart KKKK – Stationary Combustion Turbines**

Affected sources under 40 CFR 60, Subpart KKKK (NSPS KKKK), include stationary combustion turbines that commence construction after February 18, 2005 that are rated at a capacity greater than 10 MMBtu/hr. Generator Turbines P007-P027 will be subject to the requirements of NSPS KKKK, as noted below.

In accordance with 40 CFR 60.4320(a) and Table 1 to NSPS KKKK, new natural gas-fired turbines with maximum heat input capacities greater than 50 MMBtu/hr and less than or equal to 850 MMBtu/hr must comply with a NO<sub>x</sub> limit of 25 parts per million (ppm) at 15 percent oxygen or 1.2 pounds per megawatt hour (lb/MWh). Will-Power will conduct performance testing pursuant to 40 CFR 60.4340(a) to demonstrate compliance with this standard.

In accordance with 40 CFR 60.4330(a)(1) and (2), emissions of SO<sub>2</sub> from stationary combustion turbines must not exceed 0.90 lb/MWh or the sulfur content of fuel burned in stationary combustion turbines must not exceed 0.060 pounds of SO<sub>2</sub> per million British thermal units. Pursuant to 40 CFR 60.4365(a), Will-Power will maintain a valid tariff sheet specifying the maximum total sulfur content in the natural gas as no greater than 20 grains of sulfur per 100 standard cubic feet or less than 0.060 pounds of SO<sub>2</sub> per million British thermal units.

#### **2.2.4 40 CFR Part 60, Subpart KKKKa – Stationary Combustion Turbines**

US EPA proposed amendments to NSPS KKKK on December 13, 2024. If US EPA finalizes these amendments, Will-Power will comply with any applicable requirements in the final standards.

#### **2.2.5 40 CFR Part 60, Subpart TTTTa – Stationary Combustion Turbines**

Affected sources under 40 CFR 60, Subpart TTTTa (NSPS TTTTa) include each stationary combustion turbine constructed after May 23, 2023 that serves a generator or generators capable of selling greater than 25 megawatts (MW) of electricity to a utility power distribution system. Apollo will not sell electricity to a utility power distribution system. Therefore, the stationary combustion turbines at Apollo are not subject to NSPS TTTTa.

### **2.3 National Emission Standards for Hazardous Air Pollutants**

National Emission Standards for Hazardous Air Pollutants for Source Categories (NESHAPs), located in 40 CFR Part 63, are typically applicable to specific categories of sources that have the potential to emit HAP in levels greater than 10 tpy for any individual HAP or 25 tpy for any combination of HAPs (i.e., major HAP sources). Emissions and operational limitations provided in the NESHAPs are established on the basis of a Maximum Achievable Control Technology (MACT) determination for a particular major source category.

As demonstrated in Table 1-2, the facility will be considered a major source of HAPs. The following section of this application provides applicability determinations for each of the NESHAP standards to which Apollo is potentially subject.

In addition to the specific standards described below, Will-Power must also comply with the general provisions of 40 C.F.R. Part 63, Subpart A, which establish notification, recordkeeping, testing, monitoring, and reporting requirements for all sources that are subject to a particular NESHAP standard.

#### **2.3.1 40 CFR Part 63, Subpart YYYY – Stationary Combustion Turbines**

Affected sources under 40 CFR 63, Subpart YYYY (MACT YYYY) include gas fired stationary combustion turbines installed after January 14, 2003. Generator Turbines P007-P027 will be subject to the requirements of MACT YYYY, as noted below.

In accordance with 40 CFR 63.6100 and Table 1 to MACT YYYY, lean pre-mix gas fired stationary combustion turbines must limit the concentration of formaldehyde to 91 parts per billion by volume on a dry basis at 15-percent oxygen except during startup. Will-Power will conduct performance testing pursuant to 40 CFR 63.6110(a) to demonstrate compliance with this standard.

### **2.3.2 40 CFR Part 63, Subpart ZZZZ – Reciprocating Internal Combustion Engines**

Affected sources under 40 CFR 63, Subpart ZZZZ (i.e., “the RICE MACT”) include stationary reciprocating internal combustion engines (RICE) installed after June 12, 2006. Generator Engines P001-P006 and Emergency Engines P028-P029 will be subject to the requirements of the RICE MACT, as noted below.

In accordance with 40 CFR 63.6590(b)(1)(i), the Emergency Engines P028-P029 are subject only to initial notification requirements and are not subject to any other requirements under the RICE MACT.

In accordance with 40 CFR 63.6600(b) and Table 2a to the RICE MACT, 4-stroke lean burn (4SLB) stationary RICE greater than 500 hp at major sources of HAP must reduce CO emissions by at least 93 percent or must limit the concentration of formaldehyde to 14 parts per million by volume on a dry basis at 15-percent oxygen. The Generator Engines P001-P006 will be subject to these emission standards. Will-Power will conduct performance testing pursuant to 40 CFR 63.6610(a) and Table 4 to the RICE MACT to demonstrate compliance with this standard.

### **2.3.3 40 CFR 63, Subpart DDDDD – Boilers and Process Heaters**

Affected sources under 40 CFR 63, Subpart DDDDD (i.e., “the Boiler MACT”) include process heaters designed to burn “gas 1 fuels” (e.g., natural gas). Line Heaters B001-B022 will be subject to the requirement in Table 3 of the Boiler MACT to conduct a tune-up every 5 years as specified in 40 CFR 63.7540.

### **2.3.4 40 CFR 63, Subpart UUUUU – Coal and Oil-Fired Electric Utility Steam Generating Units**

The standards of 40 CFR 63, Subpart UUUUU (the Utility Mercury Air Toxics Standard [Utility MATS]) apply to coal or oil-fired electric utility steam generating units. The turbines and engines at Apollo will not be subject to the standards of the Utility MATS given that these units will fire only natural gas.

## **2.4 Cross State Air Pollution Rule**

As stated in 40 CFR 97.4(a)(1)(i)(C), the Cross State Air Pollution Rule (CSAPR) applies to units serving a generator with a nameplate capacity greater than 25 megawatts and producing electricity for sale.

Generator Turbines #7-9 and #16-17 (P013-P015, P022, and P023) each serve a generator with a nameplate capacity greater than 25 megawatts producing electricity for sale. Therefore, these units will be subject to CSAPR, and Will-Power will obtain any necessary emissions credits and conduct emissions monitoring as required by rule.

None of the other turbines or engines at Apollo will be serving generators with a nameplate capacity greater than 25 megawatts. Therefore, these units are not subject to CSAPR.

## **2.5 Acid Rain Programs**

According to 40 CFR 72.6(a)(3)(i), affected units under the Acid Rain Program include each new unit which is defined in 40 CFR 72.2 as a unit that commences commercial operation on or after November 15, 1990.

As stated in 40 CFR 72.7(a) and (b), new units meeting the following criteria are exempt from the Acid Rain Program:

- ▶ The unit serves one or more generators with total nameplate capacity of 25 megawatts or less;
- ▶ The unit burns fuel that does not include coal or coal-derived fuel; and
- ▶ Burns gaseous fuel with an annual average sulfur content of 0.05 percent or less by weight.

Generator Turbines #7-9 and #16-17 (P013-P015, P022, and P023) each serve a generator with a nameplate capacity greater than 25 megawatts producing electricity for sale. Therefore, these units will be subject to the Acid Rain Program, and Will-Power will apply for an Acid Rain Permit, will obtain any necessary emissions credits, and will conduct emissions monitoring as required by rule.

All of the other turbines and engines at Apollo will meet the aforementioned exemption criteria, and Will-Power will submit a certification to this effect to US EPA and Ohio EPA pursuant to 40 CFR 72.7(b)(2). Therefore, these turbines and engines will not be subject to the Acid Rain Program.

## 2.6 Risk Management Plan

Will-Power will store ammonia at Apollo in quantities exceeding the thresholds provided in Table 1 to 40 CFR 68, Subpart F. Therefore, Will-Power will develop and implement a Risk Management Plan (RMP) for Apollo.

## 2.7 State of Ohio Regulatory Applicability

### 2.7.1 OAC 3745-14 – NO<sub>x</sub> Budget Trading

As stated in OAC 3745-14-01(C)(1)(a)(iii), Ohio's NO<sub>x</sub> Budget Trading Program applies to units serving a generator with a nameplate capacity greater than 25 megawatts and producing electricity for sale; however, OAC 3745-14-01(C)(2)(a) clarifies that units subject to CSAPR are exempt from the NO<sub>x</sub> Budget Trading Program. As noted above, Generator Turbines #7-9 and #16-17 (P013-P015, P022, and P023) will be subject to CSAPR and are therefore exempt from the NO<sub>x</sub> Budget Trading Program.

None of the other turbines or engines at Apollo will be serving generators with a nameplate capacity greater than 25 megawatts. Therefore, these units are not subject to Ohio's NO<sub>x</sub> Budget Trading Program.

### 2.7.2 OAC 3745-17-07 – Control of Visible Emissions from Stationary Sources

OAC 3745-17-07(A) restricts visible emissions from stacks to no more than 20 percent opacity as a six-minute average except for periods no longer than six consecutive minutes in any sixty-minute period during which visible emissions are restricted to 60 percent opacity as a six-minute average.

The turbines and engines at Apollo will be subject to this visible emissions limitation. The Line Heaters B001-B022 are de minimis under OAC 3745-15-05(B) and exempt from all emissions standards in the Ohio Administrative Code.

### 2.7.3 OAC 3745-17-10 – Restrictions on Particulate Emissions from Fuel Burning Equipment

OAC 3745-17-10 applies to facilities in which fuel, including any product or by-product of a manufacturing process, is burned for the primary purpose of producing heat or power by indirect heat transfer. The turbines and engines at Apollo do not operate by way of indirect heat transfer. Therefore, these units are not subject to this section. The Line Heaters B001-B022 operate by way of indirect heat transfer, but these units are de minimis under OAC 3745-15-05(B) and exempt from all emissions standards in the Ohio Administrative Code.

#### **2.7.4 OAC 3745-17-11 – Restrictions on Particulate Emissions from Industrial Processes**

The turbines at Apollo will be subject to the emission limitation of 0.04 pounds of PM per MMBtu in OAC 3745-17-11(B)(4), and the engines at Apollo will be subject to the emission limitation of 0.062 pounds of PM per MMBtu in OAC 3745-17-11(B)(5)(b).

#### **2.7.5 OAC 3745-18-06 – Restrictions on Sulfur Dioxide Emissions**

In accordance with OAC 3745-18-06(A), the turbines, engines, and heaters at Apollo are exempt from this section because these units exclusively fire natural gas.

#### **2.7.6 OAC 3745-103 – Acid Rain Permits**

According to OAC 3745-103-02(A)(3)(a), affected units under the Acid Rain Program include each new unit which is defined in OAC 3745-103-01(N)(4) as a unit that commences commercial operation on or after November 15, 1990.

As stated in OAC 3745-103-03(A) and (B), new units meeting the following criteria are exempt from the Acid Rain Program:

- ▶ The unit serves one or more generators with total nameplate capacity of 25 megawatts or less;
- ▶ The unit burns fuel that does not include coal or coal-derived fuel; and
- ▶ Burns gaseous fuel with an annual average sulfur content of 0.05 percent or less by weight.

Generator Turbines #7-9 and #16-17 (P013-P015, P022, and P023) each serve a generator with a nameplate capacity greater than 25 megawatts producing electricity for sale. Therefore, these units will be subject to the Acid Rain Program, and Will-Power will apply for an Acid Rain Permit, will obtain any necessary emissions credits, and will conduct emissions monitoring as required by rule.

All of the other turbines and engines at Apollo will meet each of the aforementioned criteria, and Will-Power will submit a certification to this effect to US EPA and Ohio EPA pursuant to OAC 3745-103-03(B)(2). Therefore, these turbines and engines will not be subject to the Acid Rain Program.

#### **2.7.7 OAC 3745-110-03 – Nitrogen Oxides – Reasonably Available Control Technology**

As stated in OAC-3745-110-03(K)(17), sources issued operating permits restricting NO<sub>x</sub> emissions to less than 25 tons per year are not subject to Ohio's Reasonably Available Control Technology (RACT) program for NO<sub>x</sub>.

As described in Sections 1.3 and 3 of this application, Will-Power is requesting voluntary restrictions and BAT limits for Generator Engines P001-P006 and Generator Turbines P007-P027 that will restrict NO<sub>x</sub> emissions from each unit to less than 25 tons per year, and as described in Section 2.1.2 of this application, Will-Power will submit a future application to incorporate these limits into a Title V operating permit for Apollo. Therefore, Generator Engines P001-P006 and Generator Turbines P007-P027 will not be subject to the NO<sub>x</sub> RACT program.

The Emergency Engines P028-P029 are standby units that will operate less than 500 hours per year, and Will-Power will maintain records of the hours of operation. Therefore, these units are not subject to the NO<sub>x</sub> RACT program pursuant to OAC-3745-110-03(K)(2).

### 3. BEST AVAILABLE TECHNOLOGY REVIEW

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Pursuant to the provisions added to Ohio Revised Code (ORC) Chapter 3704 as a result of Senate Bill 265, sources modified or constructed after August 3, 2009, are to have rule-based best available technology (BAT) limits established by Ohio EPA for specific source categories. However, Ohio EPA has yet to promulgate the rule-based BAT limits. To address this regulatory gap, the Ohio EPA's Division of Air Pollution Control (DAPC) released a memo (February 2014 Memo) indicating that permits filed on or after August 3, 2009, must go through an interim case-by-case BAT procedure.<sup>2</sup>

The first step in determining BAT, according to the February 2014 Memo, is to review MACT, GACT, BACT, and LAER applicability. The next step is to determine whether the operations are of the type and size that are regulated by Reasonable Available Control Technology (RACT) requirements for VOC emissions.

The third step in the BAT analysis is to determine BAT on a case-by-case basis by: 1) reviewing past BAT determinations, and 2) determining the format for the BAT limit, which should be expressed in one of the following ways:

- (1) *Work practices;*
- (2) *Source design characteristics or design efficiency of applicable air contaminant control devices;*
- (3) *Raw material specifications or throughput limitations averaged over a 12-month rolling period; or*
- (4) *Monthly allowable emissions averaged over a 12-month rolling period.*

Alternatively, applicants may request BAT limits in a format consistent with Ohio EPA's historic approach for implementing BAT prior to Senate Bill 265. These "traditional BAT" limits should be established on a short-term (i.e., pound per hour) and long-term (i.e., ton per year) basis and should include ongoing monitoring and recordkeeping requirements.

Will-Power hereby requests short-term and long-term BAT limits for NO<sub>x</sub>, CO, and VOC as noted in the following table. For emissions of SO<sub>2</sub> from P013-P015, Will-Power requests a monthly limitation of 1.0 ton per month evaluated as a rolling, 12-month average. For emissions of SO<sub>2</sub> from P022-P023, Will-Power requests a monthly limitation of 2.0 ton per month evaluated as a rolling, 12-month average. Emission rates for all other pollutants from all other sources are less than 10 tpy and are exempt from BAT.

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<sup>2</sup> Ohio EPA Memo from Mike Hopkins, Assistant Chief, Permitting, DAPC, to Permit Writers and Reviewers "BAT Requirements for Permits Issued On or After February 7, 2014" dated February 7, 2014, which supersedes the BAT guidance issued on August 30, 2013. Ohio's BAT policy will be in place only until such time when the Ohio EPA develops and promulgates rules that define BAT in accordance with Ohio Revised Code (ORC) 3704.03(T) requirements.

**Table 3-1. Proposed BAT Limits**

| EU ID     | Emission Unit Description | Normal Operation<br>(lb/hr/unit) |      |      | Startup<br>(lb/event/unit) |       |       | Shutdown<br>(lb/event/unit) |       |       | Annual<br>(tpy/unit) |       |       |
|-----------|---------------------------|----------------------------------|------|------|----------------------------|-------|-------|-----------------------------|-------|-------|----------------------|-------|-------|
|           |                           | NO <sub>x</sub>                  | CO   | VOC  | NO <sub>x</sub>            | CO    | VOC   | NO <sub>x</sub>             | CO    | VOC   | NO <sub>x</sub>      | CO    | VOC   |
| P013-P015 | Generator Turbines #7-9   | 2.33                             | 2.83 | -    | 4.00                       | 64.00 | -     | 4.00                        | 52.00 | -     | 10.32                | 14.69 | -     |
| P022-P023 | Generator Turbines #16-17 | 3.59                             | 3.28 | 3.62 | 4.00                       | 64.00 | 12.00 | 4.00                        | 52.00 | 12.00 | 15.84                | 16.64 | 16.30 |

## 4. OHIO MODELING REQUIREMENTS

Air dispersion modeling is sometimes necessary to demonstrate that a source will not: 1) violate Ohio EPA's policy whereby no new source exceeds the Ohio Acceptable Incremental Impact (AII) levels (i.e., consumes more than half of the available PSD increments), or 2) causes ground-level concentrations that exceed Ohio EPA's Maximum Allowable Ground Level Concentrations (MAGLCs) for toxic air pollutants.<sup>3</sup> This section of the application describes the analysis that was conducted to address Ohio modeling requirements for the proposed project.

### 4.1 Criteria Pollutant Modeling Analysis

Engineering Guide #69: Air Dispersion Modeling Guidance (Engineering Guide #69) requires that increases in allowable emissions of regulated NSR pollutants from all new or modified sources be evaluated to determine whether the increases in allowable emissions exceed the Ohio modeling significant emission rates (SERs). For each regulated NSR pollutant for which the increase in allowable emissions exceeds the applicable SER, an air dispersion modeling analysis is required to demonstrate that the ambient incremental impact is less than the Ohio AII levels (one half of any PSD increment). Table 4-1 lists the Ohio modeling SERs and the corresponding Ohio AII levels.

**Table 4-1. Ohio Modeling Significant Emission Rates**

| <b>Pollutant</b>  | <b>Ohio Modeling SER (tpy)</b> | <b>Ohio Acceptable Incremental Impact (<math>\mu\text{g}/\text{m}^3</math>)</b> |
|-------------------|--------------------------------|---------------------------------------------------------------------------------|
| PM <sub>10</sub>  | 15                             | 8.5 – Annual                                                                    |
|                   |                                | 15 – 24-hr                                                                      |
| PM <sub>2.5</sub> | 10                             | 2 – Annual                                                                      |
|                   |                                | 4.5 – 24-hr                                                                     |
| NO <sub>2</sub>   | 40                             | 12.5 – Annual                                                                   |
|                   |                                | 188 – 1-hr                                                                      |
| SO <sub>2</sub>   | 40                             | 10 – Annual                                                                     |
|                   |                                | 45.5 – 24-hr                                                                    |
|                   |                                | 256 – 3-hr                                                                      |
|                   |                                | 196 – 1-hr                                                                      |
| CO                | 100                            | 2,500 – 8-hr                                                                    |
|                   |                                | 10,000 – 1-hr                                                                   |

As demonstrated in Table 1-2, the total allowable emissions increase from the proposed project exceeds the SER for NO<sub>x</sub>, PM<sub>10</sub>, PM<sub>2.5</sub>, SO<sub>2</sub>, and CO. Therefore, Will-Power will submit an air dispersion modeling analysis under separate cover.

<sup>3</sup> Engineering Guide #69: Air Dispersion Modeling Guidance, Ohio EPA Air Quality Modeling and Planning Section, 2018

## 4.2 Air Toxics Modeling Analysis

Item 1 of Ohio EPA's Engineering Guide #69 requires air dispersion modeling for each toxic pollutant for which the increase in allowable emissions exceeds one (1) tpy.<sup>4</sup> The air dispersion modeling must demonstrate that the ambient incremental impact is less than the Maximum Allowable Ground Level Concentrations (MAGLCs) established in accordance with Ohio EPA guidance as required by ORC 3704.03(F)(4)(b).<sup>5</sup>

As demonstrated in Appendix A, the proposed project will result in potential emissions of formaldehyde and ammonia exceeding 1 tpy. Therefore, Will-Power will submit an air toxics modeling analysis under separate cover.

The project will also result in potential emissions of acetaldehyde, acrolein, methanol, and toluene greater than 1 tpy, but these emissions originate solely from fossil fuel combustion and are also regulated under MACT standards as described in Sections 2.3.1 and 2.3.2 of this application. Therefore, these emissions are not subject to air toxics modeling requirements pursuant to Questions 9 and 10 in Ohio EPA's Engineering Guide #70.

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<sup>4</sup> Air toxic pollutants include any pollutant listed in OAC 3745-114-01.

<sup>5</sup> ORC 3704.03(F)(4)(b) requires that applicable MAGLCs be determined in accordance with Option A: Review of New Sources of Air Toxic Emissions, Ohio EPA Air Quality Modeling and Planning Section (May 1986).

## **APPENDIX A. PTE CALCULATIONS**

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Will-Power OH LLC  
Table A.1 - Facility-wide Potential Emissions

| EU ID | Description                  | NO <sub>x</sub><br>(tpy) | CO<br>(tpy) | SO <sub>2</sub><br>(tpy) | PM<br>(tpy) | PM <sub>10</sub><br>(tpy) | PM <sub>2.5</sub><br>(tpy) | VOC<br>(tpy) | NH <sub>3</sub><br>(tpy) | HCHO<br>(tpy) | Total HAP<br>(tpy) | CO <sub>2e</sub><br>(tpy) |
|-------|------------------------------|--------------------------|-------------|--------------------------|-------------|---------------------------|----------------------------|--------------|--------------------------|---------------|--------------------|---------------------------|
| P001  | CAT G3520 #1                 | 3.32                     | 3.31        | 0.92                     | 0.96        | 0.96                      | 0.96                       | 2.45         | 0.93                     | 0.79          | 1.91               | 11,298                    |
| P002  | CAT G3520 #2                 | 3.32                     | 3.31        | 0.92                     | 0.96        | 0.96                      | 0.96                       | 2.45         | 0.93                     | 0.79          | 1.91               | 11,298                    |
| P003  | CAT G3520 #3                 | 3.32                     | 3.31        | 0.92                     | 0.96        | 0.96                      | 0.96                       | 2.45         | 0.93                     | 0.79          | 1.91               | 11,298                    |
| P004  | CAT G3520 #4                 | 3.32                     | 3.31        | 0.92                     | 0.96        | 0.96                      | 0.96                       | 2.45         | 0.93                     | 0.79          | 1.91               | 11,298                    |
| P005  | CAT G3520 #5                 | 3.32                     | 3.31        | 0.92                     | 0.96        | 0.96                      | 0.96                       | 2.45         | 0.93                     | 0.79          | 1.91               | 11,298                    |
| P006  | CAT G3520 #6                 | 3.32                     | 3.31        | 0.92                     | 0.96        | 0.96                      | 0.96                       | 2.45         | 0.93                     | 0.79          | 1.91               | 11,298                    |
| P007  | Solar Titan 130 #1           | 5.58                     | 8.10        | 7.19                     | 4.97        | 4.97                      | 4.97                       | 4.57         | 13.09                    | 0.16          | 0.31               | 88,188                    |
| P008  | Solar Titan 130 #2           | 5.58                     | 8.10        | 7.19                     | 4.97        | 4.97                      | 4.97                       | 4.57         | 13.09                    | 0.16          | 0.31               | 88,188                    |
| P009  | Solar Titan 130 #3           | 5.58                     | 8.10        | 7.19                     | 4.97        | 4.97                      | 4.97                       | 4.57         | 13.09                    | 0.16          | 0.31               | 88,188                    |
| P010  | Solar Titan 130 #4           | 5.58                     | 8.10        | 7.19                     | 4.97        | 4.97                      | 4.97                       | 4.57         | 13.09                    | 0.16          | 0.31               | 88,188                    |
| P011  | Solar Titan 130 #5           | 5.58                     | 8.10        | 7.19                     | 4.97        | 4.97                      | 4.97                       | 4.57         | 13.09                    | 0.16          | 0.31               | 88,188                    |
| P012  | Solar Titan 130 #6           | 5.58                     | 8.10        | 7.19                     | 4.97        | 4.97                      | 4.97                       | 4.57         | 13.09                    | 0.16          | 0.31               | 88,188                    |
| P013  | Siemens SGT-A35 #1           | 10.32                    | 14.69       | 11.95                    | 8.26        | 8.26                      | 8.26                       | 7.37         | 21.27                    | 0.27          | 0.51               | 146,573                   |
| P014  | Siemens SGT-A35 #2           | 10.32                    | 14.69       | 11.95                    | 8.26        | 8.26                      | 8.26                       | 7.37         | 21.27                    | 0.27          | 0.51               | 146,573                   |
| P015  | Siemens SGT-A35 #3           | 10.32                    | 14.69       | 11.95                    | 8.26        | 8.26                      | 8.26                       | 7.37         | 21.27                    | 0.27          | 0.51               | 146,573                   |
| P016  | Siemens SGT-400 #1           | 4.71                     | 7.17        | 6.14                     | 4.24        | 4.24                      | 4.24                       | 4.09         | 10.83                    | 0.46          | 0.59               | 75,290                    |
| P017  | Siemens SGT-400 #2           | 4.71                     | 7.17        | 6.14                     | 4.24        | 4.24                      | 4.24                       | 4.09         | 10.83                    | 0.46          | 0.59               | 75,290                    |
| P018  | Siemens SGT-400 #3           | 4.71                     | 7.17        | 6.14                     | 4.24        | 4.24                      | 4.24                       | 4.09         | 10.83                    | 0.46          | 0.59               | 75,290                    |
| P019  | Siemens SGT-400 #4           | 4.71                     | 7.17        | 6.14                     | 4.24        | 4.24                      | 4.24                       | 4.09         | 10.83                    | 0.46          | 0.59               | 75,290                    |
| P020  | Siemens SGT-400 #5           | 4.71                     | 7.17        | 6.14                     | 4.24        | 4.24                      | 4.24                       | 4.09         | 10.83                    | 0.46          | 0.59               | 75,290                    |
| P021  | Siemens SGT-400 #6           | 4.71                     | 7.17        | 6.14                     | 4.24        | 4.24                      | 4.24                       | 4.09         | 10.83                    | 0.46          | 0.59               | 75,290                    |
| P022  | Siemens SGT-800 #1           | 15.84                    | 16.64       | 23.72                    | 16.40       | 16.40                     | 16.40                      | 16.30        | 37.77                    | 1.77          | 2.24               | 290,892                   |
| P023  | Siemens SGT-800 #2           | 15.84                    | 16.64       | 23.72                    | 16.40       | 16.40                     | 16.40                      | 16.30        | 37.77                    | 1.77          | 2.24               | 290,892                   |
| P024  | LT 16 #1                     | 6.50                     | 9.92        | 7.87                     | 5.44        | 5.44                      | 5.44                       | 4.65         | 11.82                    | 0.18          | 0.34               | 96,551                    |
| P025  | LT 16 #2                     | 6.50                     | 9.92        | 7.87                     | 5.44        | 5.44                      | 5.44                       | 4.65         | 11.82                    | 0.18          | 0.34               | 96,551                    |
| P026  | LT 16 #3                     | 6.50                     | 9.92        | 7.87                     | 5.44        | 5.44                      | 5.44                       | 4.65         | 11.82                    | 0.18          | 0.34               | 96,551                    |
| P027  | LT 16 #4                     | 6.50                     | 9.92        | 7.87                     | 5.44        | 5.44                      | 5.44                       | 4.65         | 11.82                    | 0.18          | 0.34               | 96,551                    |
| P028  | Emergency Engine #1          | 4.94                     | 0.20        | 3.19E-05                 | 0.03        | 0.03                      | 0.03                       | 0.02         | 0.00                     | 2.07E-04      | 4.34E-03           | 429                       |
| P029  | Emergency Engine #2          | 4.94                     | 0.20        | 3.19E-05                 | 0.03        | 0.03                      | 0.03                       | 0.02         | 0.00                     | 2.07E-04      | 4.34E-03           | 429                       |
| B001  | Line Heater for Titan 130 #1 | 0.61                     | 0.52        | 3.68E-03                 | 0.05        | 0.05                      | 0.05                       | 0.03         | 0.00                     | 4.61E-04      | 1.16E-02           | 733                       |
| B002  | Line Heater for Titan 130 #2 | 0.61                     | 0.52        | 3.68E-03                 | 0.05        | 0.05                      | 0.05                       | 0.03         | 0.00                     | 4.61E-04      | 1.16E-02           | 733                       |
| B003  | Line Heater for Titan 130 #3 | 0.61                     | 0.52        | 3.68E-03                 | 0.05        | 0.05                      | 0.05                       | 0.03         | 0.00                     | 4.61E-04      | 1.16E-02           | 733                       |
| B004  | Line Heater for Titan 130 #4 | 0.61                     | 0.52        | 3.68E-03                 | 0.05        | 0.05                      | 0.05                       | 0.03         | 0.00                     | 4.61E-04      | 1.16E-02           | 733                       |
| B005  | Line Heater for Titan 130 #5 | 0.61                     | 0.52        | 3.68E-03                 | 0.05        | 0.05                      | 0.05                       | 0.03         | 0.00                     | 4.61E-04      | 1.16E-02           | 733                       |
| B006  | Line Heater for Titan 130 #6 | 0.61                     | 0.52        | 3.68E-03                 | 0.05        | 0.05                      | 0.05                       | 0.03         | 0.00                     | 4.61E-04      | 1.16E-02           | 733                       |
| B007  | Line Heater for SGT-A35 #1   | 0.92                     | 0.77        | 5.51E-03                 | 0.07        | 0.07                      | 0.07                       | 0.05         | 0.00                     | 6.89E-04      | 1.74E-02           | 1,098                     |
| B008  | Line Heater for SGT-A35 #2   | 0.92                     | 0.77        | 5.51E-03                 | 0.07        | 0.07                      | 0.07                       | 0.05         | 0.00                     | 6.89E-04      | 1.74E-02           | 1,098                     |
| B009  | Line Heater for SGT-A35 #3   | 0.92                     | 0.77        | 5.51E-03                 | 0.07        | 0.07                      | 0.07                       | 0.05         | 0.00                     | 6.89E-04      | 1.74E-02           | 1,098                     |
| B010  | Line Heater for SGT-400 #1   | 0.46                     | 0.39        | 2.76E-03                 | 0.03        | 0.03                      | 0.03                       | 0.03         | 0.00                     | 3.45E-04      | 8.69E-03           | 550                       |
| B011  | Line Heater for SGT-400 #2   | 0.46                     | 0.39        | 2.76E-03                 | 0.03        | 0.03                      | 0.03                       | 0.03         | 0.00                     | 3.45E-04      | 8.69E-03           | 550                       |
| B012  | Line Heater for SGT-400 #3   | 0.46                     | 0.39        | 2.76E-03                 | 0.03        | 0.03                      | 0.03                       | 0.03         | 0.00                     | 3.45E-04      | 8.69E-03           | 550                       |
| B013  | Line Heater for SGT-400 #4   | 0.46                     | 0.39        | 2.76E-03                 | 0.03        | 0.03                      | 0.03                       | 0.03         | 0.00                     | 3.45E-04      | 8.69E-03           | 550                       |
| B014  | Line Heater for SGT-400 #5   | 0.46                     | 0.39        | 2.76E-03                 | 0.03        | 0.03                      | 0.03                       | 0.03         | 0.00                     | 3.45E-04      | 8.69E-03           | 550                       |
| B015  | Line Heater for SGT-400 #6   | 0.46                     | 0.39        | 2.76E-03                 | 0.03        | 0.03                      | 0.03                       | 0.03         | 0.00                     | 3.45E-04      | 8.69E-03           | 550                       |
| B016  | Line Heater for SGT-800 #1   | 1.53                     | 1.29        | 9.20E-03                 | 0.12        | 0.12                      | 0.12                       | 0.08         | 0.00                     | 1.15E-03      | 2.90E-02           | 1,831                     |
| B017  | Line Heater for SGT-800 #2   | 1.53                     | 1.29        | 9.20E-03                 | 0.12        | 0.12                      | 0.12                       | 0.08         | 0.00                     | 1.15E-03      | 2.90E-02           | 1,831                     |
| B018  | Line Heater for LT16 #1      | 0.61                     | 0.52        | 3.68E-03                 | 0.05        | 0.05                      | 0.05                       | 0.03         | 0.00                     | 4.61E-04      | 1.16E-02           | 733                       |
| B019  | Line Heater for LT16 #2      | 0.61                     | 0.52        | 3.68E-03                 | 0.05        | 0.05                      | 0.05                       | 0.03         | 0.00                     | 4.61E-04      | 1.16E-02           | 733                       |
| B020  | Line Heater for LT16 #3      | 0.61                     | 0.52        | 3.68E-03                 | 0.05        | 0.05                      | 0.05                       | 0.03         | 0.00                     | 4.61E-04      | 1.16E-02           | 733                       |
| B021  | Line Heater for LT16 #4      | 0.61                     | 0.52        | 3.68E-03                 | 0.05        | 0.05                      | 0.05                       | 0.03         | 0.00                     | 4.61E-04      | 1.16E-02           | 733                       |
| B022  | Line Heater for CAT G3520s   | 0.64                     | 0.54        | 3.86E-03                 | 0.05        | 0.05                      | 0.05                       | 0.04         | 0.00                     | 4.83E-04      | 1.22E-02           | 769                       |

Will-Power OH LLC

Table A.2 - Potential Emissions - CAT G3520 (w/SCR) (P001-P006)

OPERATING DATA

|                             |                |                               |
|-----------------------------|----------------|-------------------------------|
| Maximum Power Output        | 2,500 kW       | Manufacturer's specifications |
| Maximum Heat Input Capacity | 22.10 MMBtu/hr | Manufacturer's specifications |
| Exhaust Flow Rate           | 8,011.27 scfm  | Manufacturer's specifications |
| Operating Time              | 8,733 hr/yr    | Excludes SUSD Events          |

DIMENSIONAL ANALYSIS

|                          |                                     |
|--------------------------|-------------------------------------|
| Mass Conversion          | 2,000 lb/ton                        |
| Mass Conversion          | 0.4536 kg/lb                        |
| Ammonia Molecular Weight | 17.0310 lb/lbmol                    |
| Gas Constant             | 0.7302 atm-ft <sup>3</sup> /lbmol/R |
| Energy Conversion        | 1,000 kW/MW                         |

EMISSION FACTORS

| Pollutant                              |                   |                                                                      |
|----------------------------------------|-------------------|----------------------------------------------------------------------|
| NO <sub>x</sub>                        | 0.30 lb/MW-hr     | Manufacturer's specifications                                        |
| CO                                     | 0.29 lb/MW-hr     | Manufacturer's specifications                                        |
| SO <sub>2</sub>                        | 9.55E-03 lb/MMBtu | Assumes complete conversion of gas sulfur content of 0.01% by weight |
| PM/PM <sub>10</sub> /PM <sub>2.5</sub> | 0.0100 lb/MMBtu   | AP-42 Section 3.2                                                    |
| VOC                                    | 0.22 lb/MW-hr     | Manufacturer's specifications                                        |
| Ammonia                                | 10 ppm            | Worst-case ammonia slip through SCR                                  |
| Formaldehyde                           | 7.05E-02 lb/MW-hr | Manufacturer's specifications                                        |
| Total HAP (excludes formaldehyde)      | 1.16E-02 lb/MMBtu | AP-42 Section 3.2 with 40% catalyst control                          |
| CO <sub>2</sub>                        | 53.06 kg/MMBtu    | 40 CFR 98 Tables C-1 and C-2.                                        |
| CH <sub>4</sub>                        | 1.00E-03 kg/MMBtu | 40 CFR 98 Tables C-1 and C-2.                                        |
| N <sub>2</sub> O                       | 1.00E-04 kg/MMBtu | 40 CFR 98 Tables C-1 and C-2.                                        |
| CO <sub>2</sub> - GWP                  | 1.00              | Table A-1 to Subpart A of 40 CFR Part 98                             |
| CH <sub>4</sub> - GWP                  | 28.00             | Table A-1 to Subpart A of 40 CFR Part 98                             |
| N <sub>2</sub> O - GWP                 | 265.00            | Table A-1 to Subpart A of 40 CFR Part 98                             |

POTENTIAL EMISSIONS CALCULATIONS - HOURLY

Potential Emissions (lb/hr) = Emission Factor (lb/MMBtu) x Maximum Heat Input (MMBtu/hr), unless otherwise specified

| Pollutant                              | (lb/hr)  |                                                                                                                                      |
|----------------------------------------|----------|--------------------------------------------------------------------------------------------------------------------------------------|
| NO <sub>x</sub>                        | 0.74     | = Emission Factor (lb/MW-hr) x Maximum Power Output (kW) / 1,000 kW/MW                                                               |
| CO                                     | 0.73     | = Emission Factor (lb/MW-hr) x Maximum Power Output (kW) / 1,000 kW/MW                                                               |
| SO <sub>2</sub>                        | 0.21     |                                                                                                                                      |
| PM/PM <sub>10</sub> /PM <sub>2.5</sub> | 0.22     |                                                                                                                                      |
| VOC                                    | 0.56     | = Emission Factor (lb/MW-hr) x Maximum Power Output (kW) / 1,000 kW/MW                                                               |
| Ammonia                                | 0.21     | = Ammonia (ppm) / 10^6 * Exhaust Flow Rate (scfm) * 60 (min/hr) * 1 (atm) / 527.67 (Rank) / 0.7302 (atm-ft3/lbmol/R) * MW (lb/lbmol) |
| Formaldehyde                           | 0.18     | = Emission Factor (lb/MW-hr) x Maximum Power Output (kW) / 1,000 kW/MW                                                               |
| Total HAP (includes formaldehyde)      | 0.43     |                                                                                                                                      |
| CO <sub>2</sub>                        | 2,585    | = Maximum Heat Input (MMBtu/hr) x Emission Factor (kg/MMBtu) / 0.45 (kg/lb)                                                          |
| CH <sub>4</sub>                        | 4.87E-02 | = Maximum Heat Input (MMBtu/hr) x Emission Factor (kg/MMBtu) / 0.45 (kg/lb)                                                          |
| N <sub>2</sub> O                       | 4.87E-03 | = Maximum Heat Input (MMBtu/hr) x Emission Factor (kg/MMBtu) / 0.45 (kg/lb)                                                          |

POTENTIAL EMISSIONS CALCULATIONS - ANNUALLY

Potential Emissions (tpy) = Hourly Emission Rate (lb/hr) x Operating Time (hr/yr) / 2000 (lb/ton), unless otherwise specified.

| Pollutant                              | (tpy)  |                                                                                                                                                                                               |
|----------------------------------------|--------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| NO <sub>x</sub>                        | 3.22   |                                                                                                                                                                                               |
| CO                                     | 3.17   |                                                                                                                                                                                               |
| SO <sub>2</sub>                        | 0.92   |                                                                                                                                                                                               |
| PM/PM <sub>10</sub> /PM <sub>2.5</sub> | 0.96   |                                                                                                                                                                                               |
| VOC (includes formaldehyde)            | 2.43   |                                                                                                                                                                                               |
| Ammonia                                | 0.93   |                                                                                                                                                                                               |
| Formaldehyde                           | 0.77   |                                                                                                                                                                                               |
| Total HAP (includes formaldehyde)      | 1.89   |                                                                                                                                                                                               |
| CO <sub>2</sub>                        | 11,286 |                                                                                                                                                                                               |
| CH <sub>4</sub>                        | 0.21   |                                                                                                                                                                                               |
| N <sub>2</sub> O                       | 0.02   |                                                                                                                                                                                               |
| CO <sub>2</sub> e                      | 11,298 | = Annual CO <sub>2</sub> Emission (tpy) x CO <sub>2</sub> GWP + Annual CH <sub>4</sub> Emissions (tpy) x CH <sub>4</sub> GWP x Annual N <sub>2</sub> O Emissions (tpy) x N <sub>2</sub> O GWP |

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Table A.3 - Potential Emissions - Engine Startup and Shutdown Events (P001-P006)

OPERATING DATA

|                    |              |                        |
|--------------------|--------------|------------------------|
| Startup Duration   | 20 minutes   | Operational experience |
| Shutdown Duration  | 20 minutes   | Operational experience |
| Startup Frequency  | 40 events/yr |                        |
| Shutdown Frequency | 40 events/yr |                        |

DIMENSIONAL ANALYSIS

|                 |              |
|-----------------|--------------|
| Mass Conversion | 2,000 lb/ton |
|-----------------|--------------|

EMISSION FACTORS

| Pollutant       | Startup | Shutdown      |                                    |
|-----------------|---------|---------------|------------------------------------|
| NO <sub>x</sub> | 2.46    | 2.46 lb/event | Assumes no SCR or catalyst control |
| CO              | 3.45    | 3.45 lb/event | Assumes no SCR or catalyst control |
| VOC             | 0.51    | 0.51 lb/event | Assumes no SCR or catalyst control |
| Formaldehyde    | 0.39    | 0.39 lb/event | Assumes no SCR or catalyst control |
| Total HAP       | 0.51    | 0.51 lb/event | Assumes no SCR or catalyst control |

POTENTIAL EMISSIONS CALCULATIONS - HOURLY

Potential Emissions (lb/hr) = Startup Emissions (lb/event) + Shutdown Emissions (lb/event) + [Engine Normal Hourly Emissions (lb/hr)] / 2

| Pollutant       | (lb/hr) |                                                                                               |
|-----------------|---------|-----------------------------------------------------------------------------------------------|
| NO <sub>x</sub> | 5.29    | Conservatively includes 1 startup event, 1 shutdown event, and 30 minutes of normal operation |
| CO              | 7.27    | Conservatively includes 1 startup event, 1 shutdown event, and 30 minutes of normal operation |
| VOC             | 1.31    | Conservatively includes 1 startup event, 1 shutdown event, and 30 minutes of normal operation |
| Formaldehyde    | 0.87    | Conservatively includes 1 startup event, 1 shutdown event, and 30 minutes of normal operation |
| Total HAP       | 1.25    | Conservatively includes 1 startup event, 1 shutdown event, and 30 minutes of normal operation |

POTENTIAL EMISSIONS CALCULATIONS - ANNUALLY

Potential Emissions (tpy) = [Startup Emissions (lb/event) \* Startup Frequency (events/yr) + Shutdown Emissions (lb/event) \* Shutdown Frequency (events/yr)] / 2,000 (lb/ton)

| Pollutant       | (tpy) |
|-----------------|-------|
| NO <sub>x</sub> | 0.10  |
| CO              | 0.14  |
| VOC             | 0.02  |
| Formaldehyde    | 0.02  |
| Total HAP       | 0.02  |

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Table A.4 - Potential Emissions - Solar Titan 130-23001S (w/SCR) (P007-P012)

OPERATING DATA

|                             |                 |                               |
|-----------------------------|-----------------|-------------------------------|
| Maximum Power Output        | 17,863 kW       | Manufacturer's specifications |
| Maximum Heat Input Capacity | 172 MMBtu/hr    | Manufacturer's specifications |
| Exhaust Flow Rate           | 113,049.54 scfm | Manufacturer's specifications |
| Operating Time              | 8,733 hr/yr     | Excludes SUSD Events          |

DIMENSIONAL ANALYSIS

|                          |                                     |
|--------------------------|-------------------------------------|
| Mass Conversion          | 2,000 lb/ton                        |
| Mass Conversion          | 0.4536 kg/lb                        |
| Ammonia Molecular Weight | 17.0310 lb/lbmol                    |
| Gas Constant             | 0.7302 atm-ft <sup>3</sup> /lbmol/R |
| Energy Conversion        | 1,000 kW/MW                         |

EMISSION FACTORS

| Pollutant                              |                   |                                                                      |
|----------------------------------------|-------------------|----------------------------------------------------------------------|
| NO <sub>x</sub>                        | 0.07 lb/MW-hr     | Manufacturer's specifications                                        |
| CO                                     | 0.07 lb/MW-hr     | Manufacturer's specifications                                        |
| SO <sub>2</sub>                        | 9.55E-03 lb/MMBtu | Assumes complete conversion of gas sulfur content of 0.01% by weight |
| PM/PM <sub>10</sub> /PM <sub>2.5</sub> | 0.0066 lb/MMBtu   | AP-42 Table 3.1-2a                                                   |
| VOC (excludes formaldehyde)            | 0.05 lb/MW-hr     | Manufacturer's specifications                                        |
| Ammonia                                | 10 ppm            | Worst-case ammonia slip through SCR                                  |
| Formaldehyde                           | 2.10E-04 lb/MMBtu | Manufacturer's specifications                                        |
| Total HAP (excludes formaldehyde)      | 1.90E-04 lb/MMBtu | AP-42 Table 3.1-3 with 40% catalyst control                          |
| CO <sub>2</sub>                        | 53.06 kg/MMBtu    | 40 CFR 98 Tables C-1 and C-2.                                        |
| CH <sub>4</sub>                        | 1.00E-03 kg/MMBtu | 40 CFR 98 Tables C-1 and C-2.                                        |
| N <sub>2</sub> O                       | 1.00E-04 kg/MMBtu | 40 CFR 98 Tables C-1 and C-2.                                        |
| CO <sub>2</sub> - GWP                  | 1.00              | Table A-1 to Subpart A of 40 CFR Part 98                             |
| CH <sub>4</sub> - GWP                  | 28.00             | Table A-1 to Subpart A of 40 CFR Part 98                             |
| N <sub>2</sub> O - GWP                 | 265.00            | Table A-1 to Subpart A of 40 CFR Part 98                             |

POTENTIAL EMISSIONS CALCULATIONS - HOURLY

Potential Emissions (lb/hr) = Emission Factor (lb/MMBtu) x Maximum Heat Input (MMBtu/hr), unless otherwise specified

| Pollutant                              | (lb/hr)  |                                                                                                                                      |
|----------------------------------------|----------|--------------------------------------------------------------------------------------------------------------------------------------|
| NO <sub>x</sub>                        | 1.24     | = Emission Factor (lb/MW-hr) x Maximum Power Output (kW) / 1,000 kW/MW                                                               |
| CO                                     | 1.32     | = Emission Factor (lb/MW-hr) x Maximum Power Output (kW) / 1,000 kW/MW                                                               |
| SO <sub>2</sub>                        | 1.65     |                                                                                                                                      |
| PM/PM <sub>10</sub> /PM <sub>2.5</sub> | 1.14     |                                                                                                                                      |
| VOC (includes formaldehyde)            | 0.94     | = Emission Factor (lb/MW-hr) x Maximum Power Output (kW) / 1,000 kW/MW                                                               |
| Ammonia                                | 3.00     | = Ammonia (ppm) / 10^6 * Exhaust Flow Rate (scfm) * 60 (min/hr) * 1 (atm) / 527.67 (Rank) / 0.7302 (atm-ft3/lbmol/R) * MW (lb/lbmol) |
| Formaldehyde                           | 3.62E-02 |                                                                                                                                      |
| Total HAP (includes formaldehyde)      | 0.07     |                                                                                                                                      |
| CO <sub>2</sub>                        | 20,175   | = Maximum Heat Input (MMBtu/hr) x Emission Factor (kg/MMBtu) / 0.45 (kg/lb)                                                          |
| CH <sub>4</sub>                        | 3.80E-01 | = Maximum Heat Input (MMBtu/hr) x Emission Factor (kg/MMBtu) / 0.45 (kg/lb)                                                          |
| N <sub>2</sub> O                       | 3.80E-02 | = Maximum Heat Input (MMBtu/hr) x Emission Factor (kg/MMBtu) / 0.45 (kg/lb)                                                          |

POTENTIAL EMISSIONS CALCULATIONS - ANNUALLY

Potential Emissions (tpy) = Hourly Emission Rate (lb/hr) x Operating Time (hr/yr) / 2000 (lb/ton), unless otherwise specified.

| Pollutant                              | (tpy)  |                                                                                                                                                                                               |
|----------------------------------------|--------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| NO <sub>x</sub>                        | 5.42   |                                                                                                                                                                                               |
| CO                                     | 5.78   |                                                                                                                                                                                               |
| SO <sub>2</sub>                        | 7.19   |                                                                                                                                                                                               |
| PM/PM <sub>10</sub> /PM <sub>2.5</sub> | 4.97   |                                                                                                                                                                                               |
| VOC (includes formaldehyde)            | 4.09   |                                                                                                                                                                                               |
| Ammonia                                | 13.09  |                                                                                                                                                                                               |
| Formaldehyde                           | 0.16   |                                                                                                                                                                                               |
| Total HAP (includes formaldehyde)      | 0.30   |                                                                                                                                                                                               |
| CO <sub>2</sub>                        | 88,098 |                                                                                                                                                                                               |
| CH <sub>4</sub>                        | 1.66   |                                                                                                                                                                                               |
| N <sub>2</sub> O                       | 0.17   |                                                                                                                                                                                               |
| CO <sub>2</sub> e                      | 88,188 | = Annual CO <sub>2</sub> Emission (tpy) x CO <sub>2</sub> GWP + Annual CH <sub>4</sub> Emissions (tpy) x CH <sub>4</sub> GWP x Annual N <sub>2</sub> O Emissions (tpy) x N <sub>2</sub> O GWP |

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Table A.5 - Potential Emissions - SGT-A35 (w/SCR) (P013-P015)

OPERATING DATA

|                             |                 |                               |
|-----------------------------|-----------------|-------------------------------|
| Maximum Power Output        | 33,143 kW       | Manufacturer's specifications |
| Maximum Heat Input Capacity | 287 MMBtu/hr    | Manufacturer's specifications |
| Exhaust Flow Rate           | 183,690.70 scfm | Manufacturer's specifications |
| Operating Time              | 8,733 hr/yr     |                               |

DIMENSIONAL ANALYSIS

|                          |                                     |
|--------------------------|-------------------------------------|
| Mass Conversion          | 2,000 lb/ton                        |
| Mass Conversion          | 0.4536 kg/lb                        |
| Ammonia Molecular Weight | 17.0310 lb/lbmol                    |
| Gas Constant             | 0.7302 atm-ft <sup>3</sup> /lbmol/R |
| Energy Conversion        | 1,000 kW/MW                         |

EMISSION FACTORS

| Pollutant                              |                   |                                                                      |
|----------------------------------------|-------------------|----------------------------------------------------------------------|
| NO <sub>x</sub>                        | 0.07 lb/MW-hr     | Manufacturer's specifications                                        |
| CO                                     | 0.09 lb/MW-hr     | Manufacturer's specifications                                        |
| SO <sub>2</sub>                        | 9.55E-03 lb/MMBtu | Assumes complete conversion of gas sulfur content of 0.01% by weight |
| PM/PM <sub>10</sub> /PM <sub>2.5</sub> | 0.0066 lb/MMBtu   | AP-42 Table 3.1-2a                                                   |
| VOC (excludes formaldehyde)            | 0.05 lb/MW-hr     | Manufacturer's specifications                                        |
| Ammonia                                | 10 ppm            | Worst-case ammonia slip through SCR                                  |
| Formaldehyde                           | 2.10E-04 lb/MMBtu | Manufacturer's specifications                                        |
| Total HAP (excludes formaldehyde)      | 1.90E-04 lb/MMBtu | AP-42 Table 3.1-3 with 40% catalyst control                          |
| CO <sub>2</sub>                        | 53.06 kg/MMBtu    | 40 CFR 98 Tables C-1 and C-2.                                        |
| CH <sub>4</sub>                        | 1.00E-03 kg/MMBtu | 40 CFR 98 Tables C-1 and C-2.                                        |
| N <sub>2</sub> O                       | 1.00E-04 kg/MMBtu | 40 CFR 98 Tables C-1 and C-2.                                        |
| CO <sub>2</sub> - GWP                  | 1.00              | Table A-1 to Subpart A of 40 CFR Part 98                             |
| CH <sub>4</sub> - GWP                  | 28.00             | Table A-1 to Subpart A of 40 CFR Part 98                             |
| N <sub>2</sub> O - GWP                 | 265.00            | Table A-1 to Subpart A of 40 CFR Part 98                             |

POTENTIAL EMISSIONS CALCULATIONS - HOURLY

Potential Emissions (lb/hr) = Emission Factor (lb/MMBtu) x Maximum Heat Input (MMBtu/hr), unless otherwise specified

| Pollutant                              | (lb/hr)  |                                                                                                                                      |
|----------------------------------------|----------|--------------------------------------------------------------------------------------------------------------------------------------|
| NO <sub>x</sub>                        | 2.33     | = Emission Factor (lb/MW-hr) x Maximum Power Output (kW) / 1,000 kW/MW                                                               |
| CO                                     | 2.83     | = Emission Factor (lb/MW-hr) x Maximum Power Output (kW) / 1,000 kW/MW                                                               |
| SO <sub>2</sub>                        | 2.74     |                                                                                                                                      |
| PM/PM <sub>10</sub> /PM <sub>2.5</sub> | 1.89     |                                                                                                                                      |
| VOC (includes formaldehyde)            | 1.58     | = Emission Factor (lb/MW-hr) x Maximum Power Output (kW) / 1,000 kW/MW                                                               |
| Ammonia                                | 4.87     | = Ammonia (ppm) / 10^6 * Exhaust Flow Rate (scfm) * 60 (min/hr) * 1 (atm) / 527.67 (Rank) / 0.7302 (atm-ft3/lbmol/R) * MW (lb/lbmol) |
| Formaldehyde                           | 6.02E-02 |                                                                                                                                      |
| Total HAP (includes formaldehyde)      | 0.11     |                                                                                                                                      |
| CO <sub>2</sub>                        | 33,532   | = Maximum Heat Input (MMBtu/hr) x Emission Factor (kg/MMBtu) / 0.45 (kg/lb)                                                          |
| CH <sub>4</sub>                        | 6.32E-01 | = Maximum Heat Input (MMBtu/hr) x Emission Factor (kg/MMBtu) / 0.45 (kg/lb)                                                          |
| N <sub>2</sub> O                       | 6.32E-02 | = Maximum Heat Input (MMBtu/hr) x Emission Factor (kg/MMBtu) / 0.45 (kg/lb)                                                          |

POTENTIAL EMISSIONS CALCULATIONS - ANNUALLY

Potential Emissions (tpy) = Hourly Emission Rate (lb/hr) x Operating Time (hr/yr) / 2000 (lb/ton), unless otherwise specified.

| Pollutant                              | (tpy)   |                                                                                                                                                                                               |
|----------------------------------------|---------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| NO <sub>x</sub>                        | 10.16   |                                                                                                                                                                                               |
| CO                                     | 12.37   |                                                                                                                                                                                               |
| SO <sub>2</sub>                        | 11.95   |                                                                                                                                                                                               |
| PM/PM <sub>10</sub> /PM <sub>2.5</sub> | 8.26    |                                                                                                                                                                                               |
| VOC (includes formaldehyde)            | 6.89    |                                                                                                                                                                                               |
| Ammonia                                | 21.27   |                                                                                                                                                                                               |
| Formaldehyde                           | 0.26    |                                                                                                                                                                                               |
| Total HAP (includes formaldehyde)      | 0.50    |                                                                                                                                                                                               |
| CO <sub>2</sub>                        | 146,423 |                                                                                                                                                                                               |
| CH <sub>4</sub>                        | 2.76    |                                                                                                                                                                                               |
| N <sub>2</sub> O                       | 0.28    |                                                                                                                                                                                               |
| CO <sub>2</sub> e                      | 146,573 | = Annual CO <sub>2</sub> Emission (tpy) x CO <sub>2</sub> GWP + Annual CH <sub>4</sub> Emissions (tpy) x CH <sub>4</sub> GWP x Annual N <sub>2</sub> O Emissions (tpy) x N <sub>2</sub> O GWP |

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Table A.6 - Potential Emissions - Siemens SGT-400 (w/SCR) (P016-P021)

OPERATING DATA

|                             |                |                               |
|-----------------------------|----------------|-------------------------------|
| Maximum Power Output        | 15,263 kW      | Manufacturer's specifications |
| Maximum Heat Input Capacity | 147 MMBtu/hr   | Manufacturer's specifications |
| Exhaust Flow Rate           | 93,497.51 scfm | Manufacturer's specifications |
| Operating Time              | 8,733 hr/yr    |                               |

DIMENSIONAL ANALYSIS

|                          |                                     |
|--------------------------|-------------------------------------|
| Mass Conversion          | 2,000 lb/ton                        |
| Mass Conversion          | 0.4536 kg/lb                        |
| Ammonia Molecular Weight | 17.0310 lb/lbmol                    |
| Gas Constant             | 0.7302 atm-ft <sup>3</sup> /lbmol/R |
| Energy Conversion        | 1,000 kW/MW                         |

EMISSION FACTORS

| Pollutant                              |                   |                                                                      |
|----------------------------------------|-------------------|----------------------------------------------------------------------|
| NO <sub>x</sub>                        | 0.07 lb/MW-hr     | Manufacturer's specifications                                        |
| CO                                     | 0.07 lb/MW-hr     | Manufacturer's specifications                                        |
| SO <sub>2</sub>                        | 9.55E-03 lb/MMBtu | Assumes complete conversion of gas sulfur content of 0.01% by weight |
| PM/PM <sub>10</sub> /PM <sub>2.5</sub> | 0.0066 lb/MMBtu   | AP-42 Table 3.1-2a                                                   |
| VOC (excludes formaldehyde)            | 0.05 lb/MW-hr     | Manufacturer's specifications                                        |
| Ammonia                                | 10 ppm            | Worst-case ammonia slip through SCR                                  |
| Formaldehyde                           | 7.10E-04 lb/MMBtu | Manufacturer's specifications                                        |
| Total HAP (excludes formaldehyde)      | 1.90E-04 lb/MMBtu | AP-42 Table 3.1-3 with 40% catalyst control                          |
| CO <sub>2</sub>                        | 53.06 kg/MMBtu    | 40 CFR 98 Tables C-1 and C-2.                                        |
| CH <sub>4</sub>                        | 1.00E-03 kg/MMBtu | 40 CFR 98 Tables C-1 and C-2.                                        |
| N <sub>2</sub> O                       | 1.00E-04 kg/MMBtu | 40 CFR 98 Tables C-1 and C-2.                                        |
| CO <sub>2</sub> - GWP                  | 1.00              | Table A-1 to Subpart A of 40 CFR Part 98                             |
| CH <sub>4</sub> - GWP                  | 28.00             | Table A-1 to Subpart A of 40 CFR Part 98                             |
| N <sub>2</sub> O - GWP                 | 265.00            | Table A-1 to Subpart A of 40 CFR Part 98                             |

POTENTIAL EMISSIONS CALCULATIONS - HOURLY

Potential Emissions (lb/hr) = Emission Factor (lb/MMBtu) x Maximum Heat Input (MMBtu/hr), unless otherwise specified

| Pollutant                              | (lb/hr)  |                                                                                                                                                              |
|----------------------------------------|----------|--------------------------------------------------------------------------------------------------------------------------------------------------------------|
| NO <sub>x</sub>                        | 1.04     | = Emission Factor (lb/MW-hr) x Maximum Power Output (kW) / 1,000 kW/MW                                                                                       |
| CO                                     | 1.11     | = Emission Factor (lb/MW-hr) x Maximum Power Output (kW) / 1,000 kW/MW                                                                                       |
| SO <sub>2</sub>                        | 1.41     |                                                                                                                                                              |
| PM/PM <sub>10</sub> /PM <sub>2.5</sub> | 0.97     |                                                                                                                                                              |
| VOC (includes formaldehyde)            | 0.83     | = Emission Factor (lb/MW-hr) x Maximum Power Output (kW) / 1,000 kW/MW                                                                                       |
| Ammonia                                | 2.48     | = Ammonia (ppm) / 10 <sup>6</sup> * Exhaust Flow Rate (scfm) * 60 (min/hr) * 1 (atm) / 527.67 (Rank) / 0.7302 (atm-ft <sup>3</sup> /lbmol/R) * MW (lb/lbmol) |
| Formaldehyde                           | 1.05E-01 |                                                                                                                                                              |
| Total HAP (includes formaldehyde)      | 0.13     |                                                                                                                                                              |
| CO <sub>2</sub>                        | 17,224   | = Maximum Heat Input (MMBtu/hr) x Emission Factor (kg/MMBtu) / 0.45 (kg/lb)                                                                                  |
| CH <sub>4</sub>                        | 3.25E-01 | = Maximum Heat Input (MMBtu/hr) x Emission Factor (kg/MMBtu) / 0.45 (kg/lb)                                                                                  |
| N <sub>2</sub> O                       | 3.25E-02 | = Maximum Heat Input (MMBtu/hr) x Emission Factor (kg/MMBtu) / 0.45 (kg/lb)                                                                                  |

POTENTIAL EMISSIONS CALCULATIONS - ANNUALLY

Potential Emissions (tpy) = Hourly Emission Rate (lb/hr) x Operating Time (hr/yr) / 2000 (lb/ton), unless otherwise specified.

| Pollutant                              | (tpy)  |                                                                                                                                                                                               |
|----------------------------------------|--------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| NO <sub>x</sub>                        | 4.55   |                                                                                                                                                                                               |
| CO                                     | 4.85   |                                                                                                                                                                                               |
| SO <sub>2</sub>                        | 6.14   |                                                                                                                                                                                               |
| PM/PM <sub>10</sub> /PM <sub>2.5</sub> | 4.24   |                                                                                                                                                                                               |
| VOC (includes formaldehyde)            | 3.61   |                                                                                                                                                                                               |
| Ammonia                                | 10.83  |                                                                                                                                                                                               |
| Formaldehyde                           | 0.46   |                                                                                                                                                                                               |
| Total HAP (includes formaldehyde)      | 0.58   |                                                                                                                                                                                               |
| CO <sub>2</sub>                        | 75,213 |                                                                                                                                                                                               |
| CH <sub>4</sub>                        | 1.42   |                                                                                                                                                                                               |
| N <sub>2</sub> O                       | 0.14   |                                                                                                                                                                                               |
| CO <sub>2</sub> e                      | 75,290 | = Annual CO <sub>2</sub> Emission (tpy) x CO <sub>2</sub> GWP + Annual CH <sub>4</sub> Emissions (tpy) x CH <sub>4</sub> GWP x Annual N <sub>2</sub> O Emissions (tpy) x N <sub>2</sub> O GWP |

Will-Power OH LLC

Table A.7 - Potential Emissions - Siemens SGT-800 (w/SCR) (P022-P023)

OPERATING DATA

|                             |                 |                               |
|-----------------------------|-----------------|-------------------------------|
| Maximum Power Output        | 68,107 kW       | Manufacturer's specifications |
| Maximum Heat Input Capacity | 569 MMBtu/hr    | Manufacturer's specifications |
| Exhaust Flow Rate           | 326,169.63 scfm | Manufacturer's specifications |
| Operating Time              | 8,733 hr/yr     |                               |

DIMENSIONAL ANALYSIS

|                          |                                     |
|--------------------------|-------------------------------------|
| Mass Conversion          | 2,000 lb/ton                        |
| Mass Conversion          | 0.4536 kg/lb                        |
| Ammonia Molecular Weight | 17.0310 lb/lbmol                    |
| Gas Constant             | 0.7302 atm-ft <sup>3</sup> /lbmol/R |
| Energy Conversion        | 1,000 kW/MW                         |

EMISSION FACTORS

| Pollutant                              |                   |                                                                      |
|----------------------------------------|-------------------|----------------------------------------------------------------------|
| NO <sub>x</sub>                        | 0.05 lb/MW-hr     | Manufacturer's specifications                                        |
| CO                                     | 0.05 lb/MW-hr     | Manufacturer's specifications                                        |
| SO <sub>2</sub>                        | 9.55E-03 lb/MMBtu | Assumes complete conversion of gas sulfur content of 0.01% by weight |
| PM/PM <sub>10</sub> /PM <sub>2.5</sub> | 0.0066 lb/MMBtu   | AP-42 Table 3.1-2a                                                   |
| VOC (excludes formaldehyde)            | 0.05 lb/MW-hr     | Manufacturer's specifications                                        |
| Ammonia                                | 10 ppm            | Worst-case ammonia slip through SCR                                  |
| Formaldehyde                           | 7.10E-04 lb/MMBtu | Manufacturer's specifications                                        |
| Total HAP (excludes formaldehyde)      | 1.90E-04 lb/MMBtu | AP-42 Table 3.1-3 with 40% catalyst control                          |
| CO <sub>2</sub>                        | 53.06 kg/MMBtu    | 40 CFR 98 Tables C-1 and C-2.                                        |
| CH <sub>4</sub>                        | 1.00E-03 kg/MMBtu | 40 CFR 98 Tables C-1 and C-2.                                        |
| N <sub>2</sub> O                       | 1.00E-04 kg/MMBtu | 40 CFR 98 Tables C-1 and C-2.                                        |
| CO <sub>2</sub> - GWP                  | 1.00              | Table A-1 to Subpart A of 40 CFR Part 98                             |
| CH <sub>4</sub> - GWP                  | 28.00             | Table A-1 to Subpart A of 40 CFR Part 98                             |
| N <sub>2</sub> O - GWP                 | 265.00            | Table A-1 to Subpart A of 40 CFR Part 98                             |

POTENTIAL EMISSIONS CALCULATIONS - HOURLY

Potential Emissions (lb/hr) = Emission Factor (lb/MMBtu) x Maximum Heat Input (MMBtu/hr), unless otherwise specified

| Pollutant                              | (lb/hr)  |                                                                                                                                      |
|----------------------------------------|----------|--------------------------------------------------------------------------------------------------------------------------------------|
| NO <sub>x</sub>                        | 3.59     | = Emission Factor (lb/MW-hr) x Maximum Power Output (kW) / 1,000 kW/MW                                                               |
| CO                                     | 3.28     | = Emission Factor (lb/MW-hr) x Maximum Power Output (kW) / 1,000 kW/MW                                                               |
| SO <sub>2</sub>                        | 5.43     |                                                                                                                                      |
| PM/PM <sub>10</sub> /PM <sub>2.5</sub> | 3.75     |                                                                                                                                      |
| VOC (includes formaldehyde)            | 3.62     | = Emission Factor (lb/MW-hr) x Maximum Power Output (kW) / 1,000 kW/MW                                                               |
| Ammonia                                | 8.65     | = Ammonia (ppm) / 10^6 * Exhaust Flow Rate (scfm) * 60 (min/hr) * 1 (atm) / 527.67 (Rank) / 0.7302 (atm-ft3/lbmol/R) * MW (lb/lbmol) |
| Formaldehyde                           | 4.04E-01 |                                                                                                                                      |
| Total HAP (includes formaldehyde)      | 0.51     |                                                                                                                                      |
| CO <sub>2</sub>                        | 66,548   | = Maximum Heat Input (MMBtu/hr) x Emission Factor (kg/MMBtu) / 0.45 (kg/lb)                                                          |
| CH <sub>4</sub>                        | 1.25E+00 | = Maximum Heat Input (MMBtu/hr) x Emission Factor (kg/MMBtu) / 0.45 (kg/lb)                                                          |
| N <sub>2</sub> O                       | 1.25E-01 | = Maximum Heat Input (MMBtu/hr) x Emission Factor (kg/MMBtu) / 0.45 (kg/lb)                                                          |

POTENTIAL EMISSIONS CALCULATIONS - ANNUALLY

Potential Emissions (tpy) = Hourly Emission Rate (lb/hr) x Operating Time (hr/yr) / 2000 (lb/ton), unless otherwise specified.

| Pollutant                              | (tpy)   |                                                                                                                                                                                               |
|----------------------------------------|---------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| NO <sub>x</sub>                        | 15.68   |                                                                                                                                                                                               |
| CO                                     | 14.32   |                                                                                                                                                                                               |
| SO <sub>2</sub>                        | 23.72   |                                                                                                                                                                                               |
| PM/PM <sub>10</sub> /PM <sub>2.5</sub> | 16.40   |                                                                                                                                                                                               |
| VOC (includes formaldehyde)            | 15.82   |                                                                                                                                                                                               |
| Ammonia                                | 37.77   |                                                                                                                                                                                               |
| Formaldehyde                           | 1.76    |                                                                                                                                                                                               |
| Total HAP (includes formaldehyde)      | 2.24    |                                                                                                                                                                                               |
| CO <sub>2</sub>                        | 290,593 |                                                                                                                                                                                               |
| CH <sub>4</sub>                        | 5.48    |                                                                                                                                                                                               |
| N <sub>2</sub> O                       | 0.55    |                                                                                                                                                                                               |
| CO <sub>2</sub> e                      | 290,892 | = Annual CO <sub>2</sub> Emission (tpy) x CO <sub>2</sub> GWP + Annual CH <sub>4</sub> Emissions (tpy) x CH <sub>4</sub> GWP x Annual N <sub>2</sub> O Emissions (tpy) x N <sub>2</sub> O GWP |

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Table A.8 - Potential Emissions - LT16 (w/SCR) (P024-P027)

OPERATING DATA

|                             |                 |                               |
|-----------------------------|-----------------|-------------------------------|
| Maximum Power Output        | 18,139 kW       | Manufacturer's specifications |
| Maximum Heat Input Capacity | 189 MMBtu/hr    | Manufacturer's specifications |
| Exhaust Flow Rate           | 102,072.44 scfm | Manufacturer's specifications |
| Operating Time              | 8,733 hr/yr     |                               |

DIMENSIONAL ANALYSIS

|                          |                                     |
|--------------------------|-------------------------------------|
| Mass Conversion          | 2,000 lb/ton                        |
| Mass Conversion          | 0.4536 kg/lb                        |
| Ammonia Molecular Weight | 17.0310 lb/lbmol                    |
| Gas Constant             | 0.7302 atm-ft <sup>3</sup> /lbmol/R |
| Energy Conversion        | 1,000 kW/MW                         |

EMISSION FACTORS

| Pollutant                              |                   |                                                                      |
|----------------------------------------|-------------------|----------------------------------------------------------------------|
| NO <sub>x</sub>                        | 0.08 lb/MW-hr     | Manufacturer's specifications                                        |
| CO                                     | 0.10 lb/MW-hr     | Manufacturer's specifications                                        |
| SO <sub>2</sub>                        | 9.55E-03 lb/MMBtu | Assumes complete conversion of gas sulfur content of 0.01% by weight |
| PM/PM <sub>10</sub> /PM <sub>2.5</sub> | 0.0066 lb/MMBtu   | AP-42 Table 3.1-2a                                                   |
| VOC (excludes formaldehyde)            | 0.05 lb/MW-hr     | Manufacturer's specifications                                        |
| Ammonia                                | 10 ppm            | Worst-case ammonia slip through SCR                                  |
| Formaldehyde                           | 2.10E-04 lb/MMBtu | Manufacturer's specifications                                        |
| Total HAP (excludes formaldehyde)      | 1.90E-04 lb/MMBtu | AP-42 Table 3.1-3 with 40% catalyst control                          |
| CO <sub>2</sub>                        | 53.06 kg/MMBtu    | 40 CFR 98 Tables C-1 and C-2.                                        |
| CH <sub>4</sub>                        | 1.00E-03 kg/MMBtu | 40 CFR 98 Tables C-1 and C-2.                                        |
| N <sub>2</sub> O                       | 1.00E-04 kg/MMBtu | 40 CFR 98 Tables C-1 and C-2.                                        |
| CO <sub>2</sub> - GWP                  | 1.00              | Table A-1 to Subpart A of 40 CFR Part 98                             |
| CH <sub>4</sub> - GWP                  | 28.00             | Table A-1 to Subpart A of 40 CFR Part 98                             |
| N <sub>2</sub> O - GWP                 | 265.00            | Table A-1 to Subpart A of 40 CFR Part 98                             |

POTENTIAL EMISSIONS CALCULATIONS - HOURLY

Potential Emissions (lb/hr) = Emission Factor (lb/MMBtu) x Maximum Heat Input (MMBtu/hr), unless otherwise specified

| Pollutant                              | (lb/hr)  |                                                                                                                                      |
|----------------------------------------|----------|--------------------------------------------------------------------------------------------------------------------------------------|
| NO <sub>x</sub>                        | 1.45     | = Emission Factor (lb/MW-hr) x Maximum Power Output (kW) / 1,000 kW/MW                                                               |
| CO                                     | 1.74     | = Emission Factor (lb/MW-hr) x Maximum Power Output (kW) / 1,000 kW/MW                                                               |
| SO <sub>2</sub>                        | 1.80     |                                                                                                                                      |
| PM/PM <sub>10</sub> /PM <sub>2.5</sub> | 1.25     |                                                                                                                                      |
| VOC (includes formaldehyde)            | 0.95     | = Emission Factor (lb/MW-hr) x Maximum Power Output (kW) / 1,000 kW/MW                                                               |
| Ammonia                                | 2.71     | = Ammonia (ppm) / 10^6 * Exhaust Flow Rate (scfm) * 60 (min/hr) * 1 (atm) / 527.67 (Rank) / 0.7302 (atm-ft3/lbmol/R) * MW (lb/lbmol) |
| Formaldehyde                           | 3.97E-02 |                                                                                                                                      |
| Total HAP (includes formaldehyde)      | 0.08     |                                                                                                                                      |
| CO <sub>2</sub>                        | 22,088   | = Maximum Heat Input (MMBtu/hr) x Emission Factor (kg/MMBtu) / 0.45 (kg/lb)                                                          |
| CH <sub>4</sub>                        | 4.16E-01 | = Maximum Heat Input (MMBtu/hr) x Emission Factor (kg/MMBtu) / 0.45 (kg/lb)                                                          |
| N <sub>2</sub> O                       | 4.16E-02 | = Maximum Heat Input (MMBtu/hr) x Emission Factor (kg/MMBtu) / 0.45 (kg/lb)                                                          |

POTENTIAL EMISSIONS CALCULATIONS - ANNUALLY

Potential Emissions (tpy) = Hourly Emission Rate (lb/hr) x Operating Time (hr/yr) / 2000 (lb/ton), unless otherwise specified.

| Pollutant                              | (tpy)  |                                                                                                                                                                                               |
|----------------------------------------|--------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| NO <sub>x</sub>                        | 6.34   |                                                                                                                                                                                               |
| CO                                     | 7.60   |                                                                                                                                                                                               |
| SO <sub>2</sub>                        | 7.87   |                                                                                                                                                                                               |
| PM/PM <sub>10</sub> /PM <sub>2.5</sub> | 5.44   |                                                                                                                                                                                               |
| VOC (includes formaldehyde)            | 4.17   |                                                                                                                                                                                               |
| Ammonia                                | 11.82  |                                                                                                                                                                                               |
| Formaldehyde                           | 0.17   |                                                                                                                                                                                               |
| Total HAP (includes formaldehyde)      | 0.33   |                                                                                                                                                                                               |
| CO <sub>2</sub>                        | 96,452 |                                                                                                                                                                                               |
| CH <sub>4</sub>                        | 1.82   |                                                                                                                                                                                               |
| N <sub>2</sub> O                       | 0.18   |                                                                                                                                                                                               |
| CO <sub>2</sub> e                      | 96,551 | = Annual CO <sub>2</sub> Emission (tpy) x CO <sub>2</sub> GWP + Annual CH <sub>4</sub> Emissions (tpy) x CH <sub>4</sub> GWP x Annual N <sub>2</sub> O Emissions (tpy) x N <sub>2</sub> O GWP |

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Table A.9 - Potential Emissions - Turbine Startup and Shutdown Events (P007-P027)

OPERATING DATA

|                    |              |                        |
|--------------------|--------------|------------------------|
| Startup Duration   | 20 minutes   | Operational experience |
| Shutdown Duration  | 20 minutes   | Operational experience |
| Startup Frequency  | 40 events/yr |                        |
| Shutdown Frequency | 40 events/yr |                        |

DIMENSIONAL ANALYSIS

|                 |              |
|-----------------|--------------|
| Mass Conversion | 2,000 lb/ton |
|-----------------|--------------|

EMISSION FACTORS

| Pollutant       | Startup | Shutdown       |                                    |
|-----------------|---------|----------------|------------------------------------|
| NO <sub>x</sub> | 4.00    | 4.00 lb/event  | Manufacturer's specifications      |
| CO              | 64.00   | 52.00 lb/event | Manufacturer's specifications      |
| VOC             | 12.00   | 12.00 lb/event | Manufacturer's specifications      |
| Formaldehyde    | 0.13    | 0.13 lb/event  | Assumes no SCR or catalyst control |
| Total HAP       | 0.19    | 0.19 lb/event  | Assumes no SCR or catalyst control |

POTENTIAL EMISSIONS CALCULATIONS - HOURLY

Potential Emissions (lb/hr) = Startup Emissions (lb/event) + Shutdown Emissions (lb/event) + [Titan 250 Normal Hourly Emissions (lb/hr)] / 2

| Pollutant       | (lb/hr) |                                                                                               |
|-----------------|---------|-----------------------------------------------------------------------------------------------|
| NO <sub>x</sub> | 9.80    | Conservatively includes 1 startup event, 1 shutdown event, and 30 minutes of normal operation |
| CO              | 117.64  | Conservatively includes 1 startup event, 1 shutdown event, and 30 minutes of normal operation |
| VOC             | 25.81   | Conservatively includes 1 startup event, 1 shutdown event, and 30 minutes of normal operation |
| Formaldehyde    | 0.47    | Conservatively includes 1 startup event, 1 shutdown event, and 30 minutes of normal operation |
| Total HAP       | 0.65    | Conservatively includes 1 startup event, 1 shutdown event, and 30 minutes of normal operation |

POTENTIAL EMISSIONS CALCULATIONS - ANNUALLY

Potential Emissions (tpy) = [Startup Emissions (lb/event) \* Startup Frequency (events/yr) + Shutdown Emissions (lb/event) \* Shutdown Frequency (events/yr)] / 2,000 (lb/ton)

| Pollutant       | (tpy)    |
|-----------------|----------|
| NO <sub>x</sub> | 0.16     |
| CO              | 2.32     |
| VOC             | 0.48     |
| Formaldehyde    | 5.39E-03 |
| Total HAP       | 7.79E-03 |

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Table A.10 - Potential Emissions - C32 Emergency Engines (P028-P029)

OPERATING DATA

|                             |                |                               |
|-----------------------------|----------------|-------------------------------|
| Maximum Power Output        | 1,500 hp       | Manufacturer's specifications |
| Maximum Heat Input Capacity | 10.50 MMBtu/hr | Manufacturer's specifications |
| Operating Time              | 500 hr/yr      |                               |

DIMENSIONAL ANALYSIS

|                 |              |
|-----------------|--------------|
| Mass Conversion | 2,000 lb/ton |
| Mass Conversion | 0.4536 kg/lb |

EMISSION FACTORS

| Pollutant                              |                   |                                                |
|----------------------------------------|-------------------|------------------------------------------------|
| NO <sub>x</sub>                        | 1.32E-02 lb/hp-hr | Manufacturer's specifications                  |
| CO                                     | 5.29E-04 lb/hp-hr | Manufacturer's specifications                  |
| SO <sub>2</sub>                        | 1.21E-05 lb/MMBtu | AP-42 Table 3.4-1 with 15 ppm sulfur in diesel |
| PM/PM <sub>10</sub> /PM <sub>2.5</sub> | 8.82E-05 lb/hp-hr | Manufacturer's specifications                  |
| VOC                                    | 6.61E-05 lb/hp-hr | Manufacturer's specifications                  |
| Formaldehyde                           | 7.89E-05 lb/MMBtu | AP-42 Table 3.4-3                              |
| Total HAP                              | 1.57E-03 lb/MMBtu | AP-42 Tables 3.4-3 and 3.4-4                   |
| CO <sub>2</sub>                        | 73.96 kg/MMBtu    | 40 CFR 98 Tables C-1 and C-2.                  |
| CH <sub>4</sub>                        | 3.00E-03 kg/MMBtu | 40 CFR 98 Tables C-1 and C-2.                  |
| N <sub>2</sub> O                       | 6.00E-04 kg/MMBtu | 40 CFR 98 Tables C-1 and C-2.                  |
| CO <sub>2</sub> - GWP                  | 1.00              | Table A-1 to Subpart A of 40 CFR Part 98       |
| CH <sub>4</sub> - GWP                  | 28.00             | Table A-1 to Subpart A of 40 CFR Part 98       |
| N <sub>2</sub> O - GWP                 | 265.00            | Table A-1 to Subpart A of 40 CFR Part 98       |

POTENTIAL EMISSIONS CALCULATIONS - HOURLY

Potential Emissions (lb/hr) = Emission Factor (lb/MMBtu) x Maximum Heat Input (MMBtu/hr), unless otherwise specified

| Pollutant                              | (lb/hr)  |                                                                             |
|----------------------------------------|----------|-----------------------------------------------------------------------------|
| NO <sub>x</sub>                        | 19.74    | = Emission Factor (lb/hp-hr) x Maximum Power Output (hp)                    |
| CO                                     | 0.79     | = Emission Factor (lb/hp-hr) x Maximum Power Output (hp)                    |
| SO <sub>2</sub>                        | 1.27E-04 |                                                                             |
| PM/PM <sub>10</sub> /PM <sub>2.5</sub> | 0.13     | = Emission Factor (lb/hp-hr) x Maximum Power Output (hp)                    |
| VOC                                    | 0.10     | = Emission Factor (lb/hp-hr) x Maximum Power Output (hp)                    |
| Formaldehyde                           | 8.28E-04 |                                                                             |
| Total HAP                              | 1.74E-02 |                                                                             |
| CO <sub>2</sub>                        | 1,712    | = Maximum Heat Input (MMBtu/hr) x Emission Factor (kg/MMBtu) / 0.45 (kg/lb) |
| CH <sub>4</sub>                        | 6.94E-02 | = Maximum Heat Input (MMBtu/hr) x Emission Factor (kg/MMBtu) / 0.45 (kg/lb) |
| N <sub>2</sub> O                       | 1.39E-02 | = Maximum Heat Input (MMBtu/hr) x Emission Factor (kg/MMBtu) / 0.45 (kg/lb) |

POTENTIAL EMISSIONS CALCULATIONS - ANNUALLY

Potential Emissions (tpy) = Hourly Emission Rate (lb/hr) x Operating Time (hr/yr) / 2000 (lb/ton), unless otherwise specified.

| Pollutant                              | (tpy)    |                                                                                                                                                                                               |
|----------------------------------------|----------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| NO <sub>x</sub>                        | 4.94     |                                                                                                                                                                                               |
| CO                                     | 0.20     |                                                                                                                                                                                               |
| SO <sub>2</sub>                        | 3.19E-05 |                                                                                                                                                                                               |
| PM/PM <sub>10</sub> /PM <sub>2.5</sub> | 0.03     |                                                                                                                                                                                               |
| VOC                                    | 0.02     |                                                                                                                                                                                               |
| Formaldehyde                           | 2.07E-04 |                                                                                                                                                                                               |
| Total HAP (includes formaldehyde)      | 4.34E-03 |                                                                                                                                                                                               |
| CO <sub>2</sub>                        | 428      |                                                                                                                                                                                               |
| CH <sub>4</sub>                        | 1.74E-02 |                                                                                                                                                                                               |
| N <sub>2</sub> O                       | 3.47E-03 |                                                                                                                                                                                               |
| CO <sub>2</sub> e                      | 429      | = Annual CO <sub>2</sub> Emission (tpy) x CO <sub>2</sub> GWP + Annual CH <sub>4</sub> Emissions (tpy) x CH <sub>4</sub> GWP x Annual N <sub>2</sub> O Emissions (tpy) x N <sub>2</sub> O GWP |

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Table A.11 - Potential Emissions - Line Heaters for Solar Titan 130s (B001-B006)

OPERATING DATA

|                             |                   |                               |
|-----------------------------|-------------------|-------------------------------|
| Maximum Heat Input Capacity | 1.43 MMBtu/hr     | Manufacturer's specifications |
| Standard Heat Content       | 1,020 Btu/scf     |                               |
| Fuel Usage                  | 1.40E-03 mmscf/hr |                               |
| Operating Time              | 8,760 hr/yr       |                               |

DIMENSIONAL ANALYSIS

|                 |              |
|-----------------|--------------|
| Mass Conversion | 2,000 lb/ton |
| Mass Conversion | 0.4536 kg/lb |

EMISSION FACTORS

| Pollutant                              |                   |                                          |
|----------------------------------------|-------------------|------------------------------------------|
| NO <sub>x</sub>                        | 100 lb/mmscf      | AP-42 Table 1.4-1                        |
| CO                                     | 84 lb/mmscf       | AP-42 Table 1.4-1                        |
| SO <sub>2</sub>                        | 0.6 lb/mmscf      | AP-42 Table 1.4-2                        |
| PM/PM <sub>10</sub> /PM <sub>2.5</sub> | 7.6 lb/mmscf      | AP-42 Table 1.4-2                        |
| VOC                                    | 5.5 lb/mmscf      | AP-42 Table 1.4-2                        |
| Formaldehyde                           | 7.50E-02 lb/mmscf | AP-42 Table 1.4-3                        |
| Total HAP                              | 1.89 lb/mmscf     | AP-42 Tables 1.4-3 and 1.4-4             |
| CO <sub>2</sub>                        | 53.06 kg/MMBtu    | 40 CFR 98 Tables C-1 and C-2.            |
| CH <sub>4</sub>                        | 1.00E-03 kg/MMBtu | 40 CFR 98 Tables C-1 and C-2.            |
| N <sub>2</sub> O                       | 1.00E-04 kg/MMBtu | 40 CFR 98 Tables C-1 and C-2.            |
| CO <sub>2</sub> - GWP                  | 1.00              | Table A-1 to Subpart A of 40 CFR Part 98 |
| CH <sub>4</sub> - GWP                  | 28.00             | Table A-1 to Subpart A of 40 CFR Part 98 |
| N <sub>2</sub> O - GWP                 | 265.00            | Table A-1 to Subpart A of 40 CFR Part 98 |

POTENTIAL EMISSIONS CALCULATIONS - HOURLY

Potential Emissions (lb/hr) = Emission Factor (lb/mmscf) x Fuel Usage (mmscf/hr), unless otherwise specified

| Pollutant                              | (lb/hr)  |                                                                             |
|----------------------------------------|----------|-----------------------------------------------------------------------------|
| NO <sub>x</sub>                        | 0.14     |                                                                             |
| CO                                     | 0.12     |                                                                             |
| SO <sub>2</sub>                        | 8.41E-04 |                                                                             |
| PM/PM <sub>10</sub> /PM <sub>2.5</sub> | 1.07E-02 |                                                                             |
| VOC                                    | 7.71E-03 |                                                                             |
| Formaldehyde                           | 1.05E-04 |                                                                             |
| Total HAP                              | 2.65E-03 |                                                                             |
| CO <sub>2</sub>                        | 167      | = Maximum Heat Input (MMBtu/hr) x Emission Factor (kg/MMBtu) / 0.45 (kg/lb) |
| CH <sub>4</sub>                        | 3.15E-03 | = Maximum Heat Input (MMBtu/hr) x Emission Factor (kg/MMBtu) / 0.45 (kg/lb) |
| N <sub>2</sub> O                       | 3.15E-04 | = Maximum Heat Input (MMBtu/hr) x Emission Factor (kg/MMBtu) / 0.45 (kg/lb) |

POTENTIAL EMISSIONS CALCULATIONS - ANNUALLY

Potential Emissions (tpy) = Hourly Emission Rate (lb/hr) x Operating Time (hr/yr) / 2000 (lb/ton), unless otherwise specified.

| Pollutant                              | (tpy)    |                                                                                                                                                                                               |
|----------------------------------------|----------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| NO <sub>x</sub>                        | 0.61     |                                                                                                                                                                                               |
| CO                                     | 0.52     |                                                                                                                                                                                               |
| SO <sub>2</sub>                        | 3.68E-03 |                                                                                                                                                                                               |
| PM/PM <sub>10</sub> /PM <sub>2.5</sub> | 0.05     |                                                                                                                                                                                               |
| VOC                                    | 0.03     |                                                                                                                                                                                               |
| Formaldehyde                           | 4.61E-04 |                                                                                                                                                                                               |
| Total HAP (includes formaldehyde)      | 1.16E-02 |                                                                                                                                                                                               |
| CO <sub>2</sub>                        | 733      | = Annual CO <sub>2</sub> Emission (tpy) x CO <sub>2</sub> GWP + Annual CH <sub>4</sub> Emissions (tpy) x CH <sub>4</sub> GWP x Annual N <sub>2</sub> O Emissions (tpy) x N <sub>2</sub> O GWP |
| CH <sub>4</sub>                        | 1.38E-02 |                                                                                                                                                                                               |
| N <sub>2</sub> O                       | 1.38E-03 |                                                                                                                                                                                               |
| CO <sub>2</sub> e                      | 733      |                                                                                                                                                                                               |

Will-Power OH LLC

Table A.12 - Potential Emissions - Line Heaters for SGT-A35s (B007-B009)

OPERATING DATA

|                             |                   |                               |
|-----------------------------|-------------------|-------------------------------|
| Maximum Heat Input Capacity | 2.14 MMBtu/hr     | Manufacturer's specifications |
| Standard Heat Content       | 1,020 Btu/scf     |                               |
| Fuel Usage                  | 2.10E-03 mmscf/hr |                               |
| Operating Time              | 8,760 hr/yr       |                               |

DIMENSIONAL ANALYSIS

|                 |              |
|-----------------|--------------|
| Mass Conversion | 2,000 lb/ton |
| Mass Conversion | 0.4536 kg/lb |

EMISSION FACTORS

| Pollutant                              |                   |                                          |
|----------------------------------------|-------------------|------------------------------------------|
| NO <sub>x</sub>                        | 100 lb/mmscf      | AP-42 Table 1.4-1                        |
| CO                                     | 84 lb/mmscf       | AP-42 Table 1.4-1                        |
| SO <sub>2</sub>                        | 0.6 lb/mmscf      | AP-42 Table 1.4-2                        |
| PM/PM <sub>10</sub> /PM <sub>2.5</sub> | 7.6 lb/mmscf      | AP-42 Table 1.4-2                        |
| VOC                                    | 5.5 lb/mmscf      | AP-42 Table 1.4-2                        |
| Formaldehyde                           | 7.50E-02 lb/mmscf | AP-42 Table 1.4-3                        |
| Total HAP                              | 1.89 lb/mmscf     | AP-42 Tables 1.4-3 and 1.4-4             |
| CO <sub>2</sub>                        | 53.06 kg/MMBtu    | 40 CFR 98 Tables C-1 and C-2.            |
| CH <sub>4</sub>                        | 1.00E-03 kg/MMBtu | 40 CFR 98 Tables C-1 and C-2.            |
| N <sub>2</sub> O                       | 1.00E-04 kg/MMBtu | 40 CFR 98 Tables C-1 and C-2.            |
| CO <sub>2</sub> - GWP                  | 1.00              | Table A-1 to Subpart A of 40 CFR Part 98 |
| CH <sub>4</sub> - GWP                  | 28.00             | Table A-1 to Subpart A of 40 CFR Part 98 |
| N <sub>2</sub> O - GWP                 | 265.00            | Table A-1 to Subpart A of 40 CFR Part 98 |

POTENTIAL EMISSIONS CALCULATIONS - HOURLY

Potential Emissions (lb/hr) = Emission Factor (lb/mmscf) x Fuel Usage (mmscf/hr), unless otherwise specified

| Pollutant                              | (lb/hr)  |                                                                             |
|----------------------------------------|----------|-----------------------------------------------------------------------------|
| NO <sub>x</sub>                        | 0.21     |                                                                             |
| CO                                     | 0.18     |                                                                             |
| SO <sub>2</sub>                        | 1.26E-03 |                                                                             |
| PM/PM <sub>10</sub> /PM <sub>2.5</sub> | 1.59E-02 |                                                                             |
| VOC                                    | 1.15E-02 |                                                                             |
| Formaldehyde                           | 1.57E-04 |                                                                             |
| Total HAP                              | 3.96E-03 |                                                                             |
| CO <sub>2</sub>                        | 250      | = Maximum Heat Input (MMBtu/hr) x Emission Factor (kg/MMBtu) / 0.45 (kg/lb) |
| CH <sub>4</sub>                        | 4.72E-03 | = Maximum Heat Input (MMBtu/hr) x Emission Factor (kg/MMBtu) / 0.45 (kg/lb) |
| N <sub>2</sub> O                       | 4.72E-04 | = Maximum Heat Input (MMBtu/hr) x Emission Factor (kg/MMBtu) / 0.45 (kg/lb) |

POTENTIAL EMISSIONS CALCULATIONS - ANNUALLY

Potential Emissions (tpy) = Hourly Emission Rate (lb/hr) x Operating Time (hr/yr) / 2000 (lb/ton), unless otherwise specified.

| Pollutant                              | (tpy)    |                                                                                                                                                                                               |
|----------------------------------------|----------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| NO <sub>x</sub>                        | 0.92     |                                                                                                                                                                                               |
| CO                                     | 0.77     |                                                                                                                                                                                               |
| SO <sub>2</sub>                        | 5.51E-03 |                                                                                                                                                                                               |
| PM/PM <sub>10</sub> /PM <sub>2.5</sub> | 0.07     |                                                                                                                                                                                               |
| VOC                                    | 0.05     |                                                                                                                                                                                               |
| Formaldehyde                           | 6.89E-04 |                                                                                                                                                                                               |
| Total HAP (includes formaldehyde)      | 1.74E-02 |                                                                                                                                                                                               |
| CO <sub>2</sub>                        | 1,096    | = Annual CO <sub>2</sub> Emission (tpy) x CO <sub>2</sub> GWP + Annual CH <sub>4</sub> Emissions (tpy) x CH <sub>4</sub> GWP x Annual N <sub>2</sub> O Emissions (tpy) x N <sub>2</sub> O GWP |
| CH <sub>4</sub>                        | 2.07E-02 |                                                                                                                                                                                               |
| N <sub>2</sub> O                       | 2.07E-03 |                                                                                                                                                                                               |
| CO <sub>2</sub> e                      | 1,098    |                                                                                                                                                                                               |

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Table A.13 - Potential Emissions - Line Heaters for SGT-400s (B010-B015)

OPERATING DATA

|                             |                   |                               |
|-----------------------------|-------------------|-------------------------------|
| Maximum Heat Input Capacity | 1.07 MMBtu/hr     | Manufacturer's specifications |
| Standard Heat Content       | 1,020 Btu/scf     |                               |
| Fuel Usage                  | 1.05E-03 mmscf/hr |                               |
| Operating Time              | 8,760 hr/yr       |                               |

DIMENSIONAL ANALYSIS

|                 |              |
|-----------------|--------------|
| Mass Conversion | 2,000 lb/ton |
| Mass Conversion | 0.4536 kg/lb |

EMISSION FACTORS

| Pollutant                              |                   |                                          |
|----------------------------------------|-------------------|------------------------------------------|
| NO <sub>x</sub>                        | 100 lb/mmscf      | AP-42 Table 1.4-1                        |
| CO                                     | 84 lb/mmscf       | AP-42 Table 1.4-1                        |
| SO <sub>2</sub>                        | 0.6 lb/mmscf      | AP-42 Table 1.4-2                        |
| PM/PM <sub>10</sub> /PM <sub>2.5</sub> | 7.6 lb/mmscf      | AP-42 Table 1.4-2                        |
| VOC                                    | 5.5 lb/mmscf      | AP-42 Table 1.4-2                        |
| Formaldehyde                           | 7.50E-02 lb/mmscf | AP-42 Table 1.4-3                        |
| Total HAP                              | 1.89 lb/mmscf     | AP-42 Tables 1.4-3 and 1.4-4             |
| CO <sub>2</sub>                        | 53.06 kg/MMBtu    | 40 CFR 98 Tables C-1 and C-2.            |
| CH <sub>4</sub>                        | 1.00E-03 kg/MMBtu | 40 CFR 98 Tables C-1 and C-2.            |
| N <sub>2</sub> O                       | 1.00E-04 kg/MMBtu | 40 CFR 98 Tables C-1 and C-2.            |
| CO <sub>2</sub> - GWP                  | 1.00              | Table A-1 to Subpart A of 40 CFR Part 98 |
| CH <sub>4</sub> - GWP                  | 28.00             | Table A-1 to Subpart A of 40 CFR Part 98 |
| N <sub>2</sub> O - GWP                 | 265.00            | Table A-1 to Subpart A of 40 CFR Part 98 |

POTENTIAL EMISSIONS CALCULATIONS - HOURLY

Potential Emissions (lb/hr) = Emission Factor (lb/mmscf) x Fuel Usage (mmscf/hr), unless otherwise specified

| Pollutant                              | (lb/hr)  |                                                                             |
|----------------------------------------|----------|-----------------------------------------------------------------------------|
| NO <sub>x</sub>                        | 0.11     |                                                                             |
| CO                                     | 0.09     |                                                                             |
| SO <sub>2</sub>                        | 6.31E-04 |                                                                             |
| PM/PM <sub>10</sub> /PM <sub>2.5</sub> | 7.99E-03 |                                                                             |
| VOC                                    | 5.78E-03 |                                                                             |
| Formaldehyde                           | 7.88E-05 |                                                                             |
| Total HAP                              | 1.98E-03 |                                                                             |
| CO <sub>2</sub>                        | 125      | = Maximum Heat Input (MMBtu/hr) x Emission Factor (kg/MMBtu) / 0.45 (kg/lb) |
| CH <sub>4</sub>                        | 2.36E-03 | = Maximum Heat Input (MMBtu/hr) x Emission Factor (kg/MMBtu) / 0.45 (kg/lb) |
| N <sub>2</sub> O                       | 2.36E-04 | = Maximum Heat Input (MMBtu/hr) x Emission Factor (kg/MMBtu) / 0.45 (kg/lb) |

POTENTIAL EMISSIONS CALCULATIONS - ANNUALLY

Potential Emissions (tpy) = Hourly Emission Rate (lb/hr) x Operating Time (hr/yr) / 2000 (lb/ton), unless otherwise specified.

| Pollutant                              | (tpy)    |                                                                                                                                                                                               |
|----------------------------------------|----------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| NO <sub>x</sub>                        | 0.46     |                                                                                                                                                                                               |
| CO                                     | 0.39     |                                                                                                                                                                                               |
| SO <sub>2</sub>                        | 2.76E-03 |                                                                                                                                                                                               |
| PM/PM <sub>10</sub> /PM <sub>2.5</sub> | 0.03     |                                                                                                                                                                                               |
| VOC                                    | 0.03     |                                                                                                                                                                                               |
| Formaldehyde                           | 3.45E-04 |                                                                                                                                                                                               |
| Total HAP (includes formaldehyde)      | 8.69E-03 |                                                                                                                                                                                               |
| CO <sub>2</sub>                        | 549      | = Annual CO <sub>2</sub> Emission (tpy) x CO <sub>2</sub> GWP + Annual CH <sub>4</sub> Emissions (tpy) x CH <sub>4</sub> GWP x Annual N <sub>2</sub> O Emissions (tpy) x N <sub>2</sub> O GWP |
| CH <sub>4</sub>                        | 1.04E-02 |                                                                                                                                                                                               |
| N <sub>2</sub> O                       | 1.04E-03 |                                                                                                                                                                                               |
| CO <sub>2</sub> e                      | 550      |                                                                                                                                                                                               |

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Table A.14 - Potential Emissions - Line Heaters for SGT-800s (B016-B017)

OPERATING DATA

|                             |                   |                               |
|-----------------------------|-------------------|-------------------------------|
| Maximum Heat Input Capacity | 3.57 MMBtu/hr     | Manufacturer's specifications |
| Standard Heat Content       | 1,020 Btu/scf     |                               |
| Fuel Usage                  | 3.50E-03 mmscf/hr |                               |
| Operating Time              | 8,760 hr/yr       |                               |

DIMENSIONAL ANALYSIS

|                 |              |
|-----------------|--------------|
| Mass Conversion | 2,000 lb/ton |
| Mass Conversion | 0.4536 kg/lb |

EMISSION FACTORS

| Pollutant                              |                   |                                          |
|----------------------------------------|-------------------|------------------------------------------|
| NO <sub>x</sub>                        | 100 lb/mmscf      | AP-42 Table 1.4-1                        |
| CO                                     | 84 lb/mmscf       | AP-42 Table 1.4-1                        |
| SO <sub>2</sub>                        | 0.6 lb/mmscf      | AP-42 Table 1.4-2                        |
| PM/PM <sub>10</sub> /PM <sub>2.5</sub> | 7.6 lb/mmscf      | AP-42 Table 1.4-2                        |
| VOC                                    | 5.5 lb/mmscf      | AP-42 Table 1.4-2                        |
| Formaldehyde                           | 7.50E-02 lb/mmscf | AP-42 Table 1.4-3                        |
| Total HAP                              | 1.89 lb/mmscf     | AP-42 Tables 1.4-3 and 1.4-4             |
| CO <sub>2</sub>                        | 53.06 kg/MMBtu    | 40 CFR 98 Tables C-1 and C-2.            |
| CH <sub>4</sub>                        | 1.00E-03 kg/MMBtu | 40 CFR 98 Tables C-1 and C-2.            |
| N <sub>2</sub> O                       | 1.00E-04 kg/MMBtu | 40 CFR 98 Tables C-1 and C-2.            |
| CO <sub>2</sub> - GWP                  | 1.00              | Table A-1 to Subpart A of 40 CFR Part 98 |
| CH <sub>4</sub> - GWP                  | 28.00             | Table A-1 to Subpart A of 40 CFR Part 98 |
| N <sub>2</sub> O - GWP                 | 265.00            | Table A-1 to Subpart A of 40 CFR Part 98 |

POTENTIAL EMISSIONS CALCULATIONS - HOURLY

Potential Emissions (lb/hr) = Emission Factor (lb/mmscf) x Fuel Usage (mmscf/hr), unless otherwise specified

| Pollutant                              | (lb/hr)  |                                                                             |
|----------------------------------------|----------|-----------------------------------------------------------------------------|
| NO <sub>x</sub>                        | 0.35     |                                                                             |
| CO                                     | 0.29     |                                                                             |
| SO <sub>2</sub>                        | 2.10E-03 |                                                                             |
| PM/PM <sub>10</sub> /PM <sub>2.5</sub> | 2.66E-02 |                                                                             |
| VOC                                    | 1.93E-02 |                                                                             |
| Formaldehyde                           | 2.63E-04 |                                                                             |
| Total HAP                              | 6.61E-03 |                                                                             |
| CO <sub>2</sub>                        | 418      | = Maximum Heat Input (MMBtu/hr) x Emission Factor (kg/MMBtu) / 0.45 (kg/lb) |
| CH <sub>4</sub>                        | 7.87E-03 | = Maximum Heat Input (MMBtu/hr) x Emission Factor (kg/MMBtu) / 0.45 (kg/lb) |
| N <sub>2</sub> O                       | 7.87E-04 | = Maximum Heat Input (MMBtu/hr) x Emission Factor (kg/MMBtu) / 0.45 (kg/lb) |

POTENTIAL EMISSIONS CALCULATIONS - ANNUALLY

Potential Emissions (tpy) = Hourly Emission Rate (lb/hr) x Operating Time (hr/yr) / 2000 (lb/ton), unless otherwise specified.

| Pollutant                              | (tpy)    |                                                                                                                                                                                               |
|----------------------------------------|----------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| NO <sub>x</sub>                        | 1.53     |                                                                                                                                                                                               |
| CO                                     | 1.29     |                                                                                                                                                                                               |
| SO <sub>2</sub>                        | 9.20E-03 |                                                                                                                                                                                               |
| PM/PM <sub>10</sub> /PM <sub>2.5</sub> | 0.12     |                                                                                                                                                                                               |
| VOC                                    | 0.08     |                                                                                                                                                                                               |
| Formaldehyde                           | 1.15E-03 |                                                                                                                                                                                               |
| Total HAP (includes formaldehyde)      | 2.90E-02 |                                                                                                                                                                                               |
| CO <sub>2</sub>                        | 1,829    | = Annual CO <sub>2</sub> Emission (tpy) x CO <sub>2</sub> GWP + Annual CH <sub>4</sub> Emissions (tpy) x CH <sub>4</sub> GWP x Annual N <sub>2</sub> O Emissions (tpy) x N <sub>2</sub> O GWP |
| CH <sub>4</sub>                        | 3.45E-02 |                                                                                                                                                                                               |
| N <sub>2</sub> O                       | 3.45E-03 |                                                                                                                                                                                               |
| CO <sub>2</sub> e                      | 1,831    |                                                                                                                                                                                               |

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Table A.15 - Potential Emissions - Line Heaters for LT16s (B018-B021)

OPERATING DATA

|                             |                   |                               |
|-----------------------------|-------------------|-------------------------------|
| Maximum Heat Input Capacity | 1.43 MMBtu/hr     | Manufacturer's specifications |
| Standard Heat Content       | 1,020 Btu/scf     |                               |
| Fuel Usage                  | 1.40E-03 mmscf/hr |                               |
| Operating Time              | 8,760 hr/yr       |                               |

DIMENSIONAL ANALYSIS

|                 |              |
|-----------------|--------------|
| Mass Conversion | 2,000 lb/ton |
| Mass Conversion | 0.4536 kg/lb |

EMISSION FACTORS

| Pollutant                              |                   |                                          |
|----------------------------------------|-------------------|------------------------------------------|
| NO <sub>x</sub>                        | 100 lb/mmscf      | AP-42 Table 1.4-1                        |
| CO                                     | 84 lb/mmscf       | AP-42 Table 1.4-1                        |
| SO <sub>2</sub>                        | 0.6 lb/mmscf      | AP-42 Table 1.4-2                        |
| PM/PM <sub>10</sub> /PM <sub>2.5</sub> | 7.6 lb/mmscf      | AP-42 Table 1.4-2                        |
| VOC                                    | 5.5 lb/mmscf      | AP-42 Table 1.4-2                        |
| Formaldehyde                           | 7.50E-02 lb/mmscf | AP-42 Table 1.4-3                        |
| Total HAP                              | 1.89 lb/mmscf     | AP-42 Tables 1.4-3 and 1.4-4             |
| CO <sub>2</sub>                        | 53.06 kg/MMBtu    | 40 CFR 98 Tables C-1 and C-2.            |
| CH <sub>4</sub>                        | 1.00E-03 kg/MMBtu | 40 CFR 98 Tables C-1 and C-2.            |
| N <sub>2</sub> O                       | 1.00E-04 kg/MMBtu | 40 CFR 98 Tables C-1 and C-2.            |
| CO <sub>2</sub> - GWP                  | 1.00              | Table A-1 to Subpart A of 40 CFR Part 98 |
| CH <sub>4</sub> - GWP                  | 28.00             | Table A-1 to Subpart A of 40 CFR Part 98 |
| N <sub>2</sub> O - GWP                 | 265.00            | Table A-1 to Subpart A of 40 CFR Part 98 |

POTENTIAL EMISSIONS CALCULATIONS - HOURLY

Potential Emissions (lb/hr) = Emission Factor (lb/mmscf) x Fuel Usage (mmscf/hr), unless otherwise specified

| Pollutant                              | (lb/hr)  |                                                                             |
|----------------------------------------|----------|-----------------------------------------------------------------------------|
| NO <sub>x</sub>                        | 0.14     |                                                                             |
| CO                                     | 0.12     |                                                                             |
| SO <sub>2</sub>                        | 8.41E-04 |                                                                             |
| PM/PM <sub>10</sub> /PM <sub>2.5</sub> | 1.07E-02 |                                                                             |
| VOC                                    | 7.71E-03 |                                                                             |
| Formaldehyde                           | 1.05E-04 |                                                                             |
| Total HAP                              | 2.65E-03 |                                                                             |
| CO <sub>2</sub>                        | 167      | = Maximum Heat Input (MMBtu/hr) x Emission Factor (kg/MMBtu) / 0.45 (kg/lb) |
| CH <sub>4</sub>                        | 3.15E-03 | = Maximum Heat Input (MMBtu/hr) x Emission Factor (kg/MMBtu) / 0.45 (kg/lb) |
| N <sub>2</sub> O                       | 3.15E-04 | = Maximum Heat Input (MMBtu/hr) x Emission Factor (kg/MMBtu) / 0.45 (kg/lb) |

POTENTIAL EMISSIONS CALCULATIONS - ANNUALLY

Potential Emissions (tpy) = Hourly Emission Rate (lb/hr) x Operating Time (hr/yr) / 2000 (lb/ton), unless otherwise specified.

| Pollutant                              | (tpy)    |                                                                                                                                                                                               |
|----------------------------------------|----------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| NO <sub>x</sub>                        | 0.61     |                                                                                                                                                                                               |
| CO                                     | 0.52     |                                                                                                                                                                                               |
| SO <sub>2</sub>                        | 3.68E-03 |                                                                                                                                                                                               |
| PM/PM <sub>10</sub> /PM <sub>2.5</sub> | 0.05     |                                                                                                                                                                                               |
| VOC                                    | 0.03     |                                                                                                                                                                                               |
| Formaldehyde                           | 4.61E-04 |                                                                                                                                                                                               |
| Total HAP (includes formaldehyde)      | 1.16E-02 |                                                                                                                                                                                               |
| CO <sub>2</sub>                        | 733      | = Annual CO <sub>2</sub> Emission (tpy) x CO <sub>2</sub> GWP + Annual CH <sub>4</sub> Emissions (tpy) x CH <sub>4</sub> GWP x Annual N <sub>2</sub> O Emissions (tpy) x N <sub>2</sub> O GWP |
| CH <sub>4</sub>                        | 1.38E-02 |                                                                                                                                                                                               |
| N <sub>2</sub> O                       | 1.38E-03 |                                                                                                                                                                                               |
| CO <sub>2</sub> e                      | 733      |                                                                                                                                                                                               |

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Table A.16 - Potential Emissions - Line Heater for G3520s (B022)

OPERATING DATA

|                             |                   |                               |
|-----------------------------|-------------------|-------------------------------|
| Maximum Heat Input Capacity | 1.50 MMBtu/hr     | Manufacturer's specifications |
| Standard Heat Content       | 1,020 Btu/scf     |                               |
| Fuel Usage                  | 1.47E-03 mmscf/hr |                               |
| Operating Time              | 8,760 hr/yr       |                               |

DIMENSIONAL ANALYSIS

|                 |              |
|-----------------|--------------|
| Mass Conversion | 2,000 lb/ton |
| Mass Conversion | 0.4536 kg/lb |

EMISSION FACTORS

| Pollutant                              |                   |                                          |
|----------------------------------------|-------------------|------------------------------------------|
| NO <sub>x</sub>                        | 100 lb/mmscf      | AP-42 Table 1.4-1                        |
| CO                                     | 84 lb/mmscf       | AP-42 Table 1.4-1                        |
| SO <sub>2</sub>                        | 0.6 lb/mmscf      | AP-42 Table 1.4-2                        |
| PM/PM <sub>10</sub> /PM <sub>2.5</sub> | 7.6 lb/mmscf      | AP-42 Table 1.4-2                        |
| VOC                                    | 5.5 lb/mmscf      | AP-42 Table 1.4-2                        |
| Formaldehyde                           | 7.50E-02 lb/mmscf | AP-42 Table 1.4-3                        |
| Total HAP                              | 1.89 lb/mmscf     | AP-42 Tables 1.4-3 and 1.4-4             |
| CO <sub>2</sub>                        | 53.06 kg/MMBtu    | 40 CFR 98 Tables C-1 and C-2.            |
| CH <sub>4</sub>                        | 1.00E-03 kg/MMBtu | 40 CFR 98 Tables C-1 and C-2.            |
| N <sub>2</sub> O                       | 1.00E-04 kg/MMBtu | 40 CFR 98 Tables C-1 and C-2.            |
| CO <sub>2</sub> - GWP                  | 1.00              | Table A-1 to Subpart A of 40 CFR Part 98 |
| CH <sub>4</sub> - GWP                  | 28.00             | Table A-1 to Subpart A of 40 CFR Part 98 |
| N <sub>2</sub> O - GWP                 | 265.00            | Table A-1 to Subpart A of 40 CFR Part 98 |

POTENTIAL EMISSIONS CALCULATIONS - HOURLY

Potential Emissions (lb/hr) = Emission Factor (lb/mmscf) x Fuel Usage (mmscf/hr), unless otherwise specified

| Pollutant                              | (lb/hr)  |                                                                             |
|----------------------------------------|----------|-----------------------------------------------------------------------------|
| NO <sub>x</sub>                        | 0.15     |                                                                             |
| CO                                     | 0.12     |                                                                             |
| SO <sub>2</sub>                        | 8.82E-04 |                                                                             |
| PM/PM <sub>10</sub> /PM <sub>2.5</sub> | 1.12E-02 |                                                                             |
| VOC                                    | 8.09E-03 |                                                                             |
| Formaldehyde                           | 1.10E-04 |                                                                             |
| Total HAP                              | 2.78E-03 |                                                                             |
| CO <sub>2</sub>                        | 175      | = Maximum Heat Input (MMBtu/hr) x Emission Factor (kg/MMBtu) / 0.45 (kg/lb) |
| CH <sub>4</sub>                        | 3.31E-03 | = Maximum Heat Input (MMBtu/hr) x Emission Factor (kg/MMBtu) / 0.45 (kg/lb) |
| N <sub>2</sub> O                       | 3.31E-04 | = Maximum Heat Input (MMBtu/hr) x Emission Factor (kg/MMBtu) / 0.45 (kg/lb) |

POTENTIAL EMISSIONS CALCULATIONS - ANNUALLY

Potential Emissions (tpy) = Hourly Emission Rate (lb/hr) x Operating Time (hr/yr) / 2000 (lb/ton), unless otherwise specified.

| Pollutant                              | (tpy)    |                                                                                                                                                                                               |
|----------------------------------------|----------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| NO <sub>x</sub>                        | 0.64     |                                                                                                                                                                                               |
| CO                                     | 0.54     |                                                                                                                                                                                               |
| SO <sub>2</sub>                        | 3.86E-03 |                                                                                                                                                                                               |
| PM/PM <sub>10</sub> /PM <sub>2.5</sub> | 0.05     |                                                                                                                                                                                               |
| VOC                                    | 0.04     |                                                                                                                                                                                               |
| Formaldehyde                           | 4.83E-04 |                                                                                                                                                                                               |
| Total HAP (includes formaldehyde)      | 1.22E-02 |                                                                                                                                                                                               |
| CO <sub>2</sub>                        | 769      | = Annual CO <sub>2</sub> Emission (tpy) x CO <sub>2</sub> GWP + Annual CH <sub>4</sub> Emissions (tpy) x CH <sub>4</sub> GWP x Annual N <sub>2</sub> O Emissions (tpy) x N <sub>2</sub> O GWP |
| CH <sub>4</sub>                        | 1.45E-02 |                                                                                                                                                                                               |
| N <sub>2</sub> O                       | 1.45E-03 |                                                                                                                                                                                               |
| CO <sub>2</sub> e                      | 769      |                                                                                                                                                                                               |
|                                        |          |                                                                                                                                                                                               |