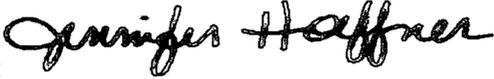


COMMONWEALTH OF VIRGINIA
Department of Environmental Quality
Piedmont Regional Office

STATEMENT OF LEGAL AND FACTUAL BASIS

Industrial Power Generating Company, LLC
Rockville, Virginia
Permit No. PRO-51201

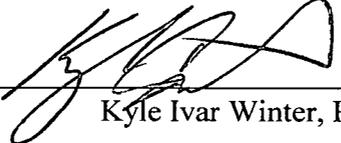
Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operating Permits, called Title V Operating Permits. As required by 40 CFR Part 70 and 9 VAC 5 Chapter 80, Industrial Power Generating Company, LLC (Ingenco), has applied for a renewal Title V Operating Permit for its Rockville, Virginia facility. The Department of Environmental Quality, Division of Air Quality (DEQ) has reviewed the application and has prepared a draft renewal Title V Operating Permit (Permit).

Engineer/Permit Contact:  Date: July 21, 2015

Jennifer Hoeffner
(434) 582-6229

Air Permit Manager:  Date: 7/21/2015

James E. Kyle, P.E.

Deputy Regional Director:  Date: 7/21/2015

Kyle Ivar Winter, P.E.

Facility Information

Permittee

Industrial Power Generating Company, LLC
2250 Dabney Rd.
Richmond, VA 23230

Responsible Official

Ms. Leann Plagens
Vice President & EH&S Regulatory Compliance

Facility

Ingenco- Rockville Plant
2369 Lanier Road
Rockville, VA 23146

County Plant ID: 51-075-0030

Source Description

NAICS ID# 221119 - Other Electrical Power Generation
SIC Code: 4931-Electrical Power Generation

The facility is a 14 MW power generation facility composed of forty generators each rated at 350 kW. The facility is located in an attainment area for all pollutants. The facility is a Title V major source for NO_x emissions. The source's permitted emissions for all pollutants are below PSD applicability levels. The facility is currently permitted under a minor NSR permit issued on December 4, 2013. The original Title V permit became effective on April 22, 2004, which was initially renewed on April 28, 2009. The source applied for their subsequent renewal on October 16, 2013 and their application was found timely and complete and was eligible for an application shield.

Compliance Status

A full compliance evaluation of this facility, including a site visit, has been conducted. In addition, all reports and other data required by permit conditions or regulations, which are submitted to DEQ, are evaluated for compliance. On February 24, 2015, a Request for Corrective Action was issued for the failure to monitor the inlet temperature on the oxidation catalyst and the catalyst pressure drop. Ingenco has since responded by letter dated March 12, 2015, that they will conduct the monitoring. Based on this information, the facility was not found to be in violation of any state or federal applicable requirements at this time.

Emission Unit and Control Device Identification

The emissions units at this facility consist of the following:

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
E1-E16	S-1 S-2 S-3 S-4	350 kW, 475 hp Generators (16 in Group R-1)	Each engine is rated at 3.2 MMBtu/hour input, Detroit Diesel Model 6063-GK 60.	NA- air-to-fuel ratio control, turbo-charging, custom built after coolers and charge-air cooling systems in use on engines.	-	NO _x , CO, SO _x , VOCs, PM, PM 10, PCBs.	12/4/2013
E17-E40	S-5 S-6 S-7 S-8	350 kW, 475 hp Generators (24 in Group R-2)	Each engine is rated at 3.2 MMBtu/hour input, Detroit Diesel Model 6063-GK 60.	NA- air-to-fuel ratio control, turbo-charging, custom built after coolers and charge-air cooling systems in use on engines.	-	NO _x , CO, SO _x , VOCs, PM, PM 10, PCBs.	12/4/2013
B1	B1	Oil-Fired Utility Boiler	0.2 MMBtu/hour	NA	-	NO _x , CO, SO _x , VOCs, PM, PM 10	NA

Emissions Inventory

Emissions are summarized in the following table. The hazardous air pollutant emissions that were reported were negligible, all less than 1×10^{-4} .

<i>2012 PLANTWIDE EMISSIONS SUMMARY [TONS PER YEAR]</i>	
CRITERIA POLLUTANTS	2012 ACTUAL EMISSIONS
Particulate Matter (PM10)	0.06
Particulate Matter (PM2.5)	0.06
Nitrogen Oxides (NO _x)	1.3
Sulfur Dioxide (SO ₂)	0.06
Carbon Monoxide (CO)	0.1
VOC	0.06

Emission Unit Applicable Requirements- [Emission Units E1-E40 and B1]

The Title V emission requirements are based on the following: the minor NSR permit issued on December 4, 2013, 40 CFR 63 Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants: for Stationary Reciprocating Internal Combustion Engines, 40 CFR 63 Subpart JJJJJ, National Emission Standards for Hazardous Air Pollutants: for Industrial, Commercial, and Institutional Boilers Area Sources, and 9 VAC 5-80-50 *et seq.*, Part II-Article 1 Federal Operating Permit for Stationary Sources.

Fuel Burning Emission Unit Applicable Requirements – [Emission Units E1-E40 and B1]**Limitations**

The December 4, 2013 minor NSR permit conditions 2, 3, 4, 5, 6, 7, 8, 13, 14, 15, 16, 17 and 19 are included in the Title V permit. These conditions limit operating of the diesel engines (E1-E40) stack heights, fuel types, fuel quantity, lb/MMBtu emission limitations, and opacity. The minor NSR permit condition limitations are based on operational and BACT requirements. Condition 14 of the Title V permit limits the operations of the diesel engines and is based on 40 CFR 63 Subpart ZZZZ requirements. Condition 15 of the Title V permit limits the operations of the utility boiler and is based on 40 CFR 63 Subpart JJJJJ requirements.

Compliance Assurance Monitoring

Compliance Assurance Monitoring (CAM) requirements of 40 CFR 64 do not apply to emission units E1- E40 because the units do not have add-on control devices to achieve compliance with NOx emission limitations.

Monitoring/Testing/Recordkeeping/Reporting

Conditions 23, 29 and 30 of the Title V permit were included to meet Part 70 periodic monitoring requirements.

December 4, 2013 minor NSR permit

The monitoring, testing, notification and recordkeeping requirements in Conditions 9-12, 20, 21-24, 31 and 32 of the NSR permit have been examined and determined to meet Part 70 periodic monitoring requirements as is. These requirements have been included as Conditions 16, 19, 20, 22, 24(a-e and h-l), 25-28, 31 and 32 of the proposed TV permit.

40 CFR 63 Subpart ZZZZ

By definition, Part 63 MACT standards are presumed to include sufficient monitoring, recordkeeping and reporting (MRR) requirements to satisfy both periodic monitoring and CAM requirements. The MRR requirements of Subpart ZZZZ have been included as Condition 14 of the Title V permit. The standards of Subpart ZZZZ were evaluated for monitoring adequacy and in most cases the requirements of the Subpart provide a reasonable assurance of compliance with the applicable emission standards. One exception was noted, the standard of 40 CFR §§63.6603 (a), Table 2b(2), does not contain any specific or enforceable monitoring requirements so,

periodic monitoring was applied to these standards in the Title V permit. The periodic monitoring requirements have been included in Conditions 17, 18, 21, 24(f) and (g) of the Title V permit.

40 CFR 63 Subpart JJJJJ

By definition, Part 63 MACT standards are presumed to include sufficient MRR requirements to satisfy both periodic monitoring and CAM requirements. The MRR requirements of Subpart JJJJJ have been included as Condition 15 of the Title V permit. The standards of Subpart JJJJJ were evaluated for monitoring adequacy and the requirements of the Subpart provide a reasonable assurance of compliance with the applicable emission standards.

Facility Wide Conditions

Limitations

Condition 18 of the NSR permit (Condition 33 of the Title V permit) limits emissions from the entire facility.

Testing

Condition 18 of the NSR permit (Condition 33 of the Title V permit) requires the facility to be constructed to allow for emissions testing.

Streamlined Requirements

The permit invalidation condition 29 from the NSR permit which included requirements regarding construction of the facility has been omitted from the Title V permit because the facility has been constructed.

“Daily” has been removed from condition 22 of the Title V permit. The condition in part stated, “The permittee shall keep a daily log of the temperature...” The requirement is actually hourly. Since the condition is based on the underlying NSR permit and to be consistent with other similar conditions “hourly” was not added to the condition.

General Conditions

The permit contains general conditions required by 40 CFR Part 70 and 9 VAC 5-80-110 that apply to all Federal-operating permitted sources. These include requirements for submitting semi-annual monitoring reports and an annual compliance certification report. The permit also requires notification of deviations from permit requirements or any excess emissions.

Permit Expiration

This condition refers to the Board taking action on a permit application. The Board is the State Air Pollution Control Board. The authority to take action on permit application(s) has been delegated to the Regions as allowed by §2.2-604 and §10.1-1185 of the *Code of Virginia*, and the “Department of Environmental Quality Agency Policy Statement No. 2-09”.

This general condition cite(s) the Article(s) that follow(s):

Article 1 (9 VAC 5-80-50 et seq.), Part II of 9 VAC 5 Chapter 80.
Federal Operating Permits for Stationary Sources

This general condition cites the sections that follow:

- 9 VAC 5-80-80. Application
- 9 VAC 5-80-140. Permit Shield
- 9 VAC 5-80-150. Action on Permit Applications

Failure/Malfunction Reporting

Section 9 VAC 5-20-180 requires malfunction and excess emission reporting within four hours of discovery. Section 9 VAC 5-80-250 of the Title V regulations also requires malfunction reporting; however, reporting is required within two days. Section 9 VAC 5-20-180 is from the general regulations. All affected facilities are subject to section 9 VAC 5-20-180 including Title V facilities. Section 9 VAC 5-80-250 is from the Title V regulations. Title V facilities are subject to both sections. A facility may make a single report that meets the requirements of 9 VAC 5-20-180 and 9 VAC 5-80-250. The report must be made within four daytime business hours of discovery of the malfunction.

This general condition cites the sections that follow:

- 9 VAC 5-40-41. Emissions Monitoring Procedures for Existing Sources
- 9 VAC 5-40-50. Notification, Records and Reporting
- 9 VAC 5-50-50. Notification, Records and Reporting

This general condition contains a citation from the Code of Federal Regulations as follows:

- 40 CFR 60.13 (h). Monitoring Requirements

Permit Modification

This general condition cites the sections that follow:

- 9 VAC 5-80-50. Applicability, Federal Operating Permit For Stationary Sources
- 9 VAC 5-80-190. Changes to Permits.
- 9 VAC 5-80-260. Enforcement.
- 9 VAC 5-80-1100. Applicability, Permits for New and Modified Stationary Sources
- 9 VAC 5-80-1605. Applicability, Permits for Major Stationary Sources and Modifications
Located in Prevention of Significant Deterioration Areas
- 9 VAC 5-80-2000. Applicability, Permits for Major Stationary Sources and Major Modifications
Locating in Nonattainment Areas

Malfunction as an Affirmative Defense

The regulations contain two reporting requirements for malfunctions that coincide. The reporting requirements are listed in sections 9 VAC 5-80-250 and 9 VAC 5-20-180. The malfunction requirements are listed in General Condition U and General Condition F. For further explanation see the comments on general condition F.

This general condition cites the sections that follow:

9 VAC 5-20-180. Facility and Control Equipment Maintenance or Malfunction
9 VAC 5-80-110. Permit Content

Asbestos Requirements

The Virginia Department of Labor and Industry under Section 40.1-51.20 of the Code of Virginia also holds authority to enforce 40 CFR 61 Subpart M, National Emission Standards for Asbestos.

This general condition contains a citation from the Code of Federal Regulations that follow:

40 CFR 61.145, NESHAP Subpart M. National Emissions Standards for Asbestos as it applies to demolition and renovation.

40 CFR 61.148, NESHAP Subpart M. National Emissions Standards for Asbestos as it applies to insulating materials.

40 CFR 61.150, NESHAP Subpart M. National Emissions Standards for Asbestos as it applies to waste disposal.

This general condition cites the regulatory sections that follow:

9 VAC 5-60-70. Designated Emissions Standards

9 VAC 5-80-110. Permit Content

State Only Applicable Requirements

The following Virginia Administrative Codes have specific requirements only enforceable by the State and have been identified as applicable by the applicant:

9 VAC 5-50-310, Odorous Emissions

Future Applicable Requirements

There are no future applicable requirements for the permit.

Inapplicable Requirements

The NSPS Subpart IIII, NSPS Kb, and Existing Source Rules do not apply to the facility. In addition, certain portions of MACT Subpart A do not apply. An explanation for the determination is provided in the following:

NSPS Subpart IIII does not apply because each of the engines were constructed before 2007 and have not been modified or reconstructed.

NSPS Subpart Kb does not apply because the Subpart no longer contains the recordkeeping requirements for the type of tanks at the facility.

Existing Source Rule 4-8 does not apply (9 VAC 5-40-880)

"E. The provisions of this article do not apply to stationary internal combustion engines."

Existing Source Rule 4-37 does not apply (9 VAC 5-40-5200) because the tanks are storing petroleum liquids with a vapor pressure of less than 1.5 psi.

Internal Combustion Engine ACT does not apply [EPA453R-93032]

"Engines are permitted below the NOx lb/MMBtu level in the ACT and do not apply until area is designated Non-attainment for Ozone."

Certain MACT Subpart A requirements do not apply. The inapplicable sections are 40 CFR Part 63.6(d), 63.6(e), 63.6(h), 63.7(e)(1), 63.8(a)(4), 63.8(c)(5), 63.9(d), 63.10(b)(2)(i)-(v), 63.10(d)(3), 63.1(e)(2)(ii), 63.10(e)(4), and 63.11.

Greenhouse Gas (GHG) Requirements - There are no applicable GHG permitting requirements for this source.

Compliance Plan

There is no compliance plan for the permit.

Insignificant Emission Units

The insignificant emission units are presumed to be in compliance with all requirements of the Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110.

Insignificant emission units include the following:

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (5-80-720 B)	Rated Capacity (5-80-720 C)
Area 1 T-1	Fuel oil storage tank	5-80-720 B.	VOC	15,000 Gallon
T-2	Fuel oil storage tank	5-80-720 B.	VOC	15,000 Gallon
T-3	Fuel oil storage tank	5-80-720 B.	VOC	10,000 Gallon
T-4	Fuel oil storage tank	5-80-720 B.	VOC	20,700 Gallon

T-5	Lubricating Oil	5-80-720 B.	VOC	500 Gallon
T-6	Used Lubricating Oil	5-80-720 B.	VOC	500 Gallon
R-1	Heating Oil	5-80-720 B.	VOC	275 Gallon
Area 2 R-2	Heating Oil	5-80-720 B.	VOC	275 Gallon
T-5	Fuel oil storage tank	5-80-720 B.	VOC	31,000 Gallon
T-6	Fuel oil storage tank	5-80-720 B.	VOC	31,000 Gallon
T-10	Fuel oil storage tank	5-80-720 B.	VOC	10,000 Gallon
T-11	Fuel oil storage tank	5-80-720 B.	VOC	13,500 Gallon
T-20	Fuel oil storage tank	5-80-720 B.	VOC	20,000 Gallon
T-21	Fuel oil storage tank	5-80-720 B.	VOC	20,000 Gallon
T-30	Fuel oil storage tank	5-80-720 B.	VOC	20,700 Gallon
T-31	Fuel oil storage tank	5-80-720 B.	VOC	20,700 Gallon
T-32	Fuel oil storage tank	5-80-720 B.	VOC	20,700 Gallon
T-33	Fuel oil storage tank	5-80-720 B.	VOC	20,700 Gallon
T-34	Fuel oil storage tank	5-80-720 B.	VOC	20,700 Gallon
T-35	Fuel oil storage tank	5-80-720 B.	VOC	20,700 Gallon

¹The citation criteria for insignificant activities are as follows:

9 VAC 5-80-720 A - Listed Insignificant Activity, Not Included in Permit Application

9 VAC 5-80-720 B - Insignificant due to emission levels

9 VAC 5-80-720 C - Insignificant due to size or production rate

Confidential Information

The applicant did not submit a request for confidentiality. All portions of the Title V application are suitable for public review.

Public Participation

The proposed permit was placed on public notice in the Goochland Gazette from June 18, 2015 to July 20, 2015. The permit was concurrently reviewed by EPA. On July 2, 2015, comments were received from EPA. All comments were addressed. No additional comments were received during the Public Comment period.

**Commonwealth of Virginia
Department of Environmental Quality
Consolidated Plant Emissions Report**

Registration No: 51201
Plant Name: INGENCO - Rockville Plant

FIPS County Code: 075
Plant ID: 00030

Year of Emissions: 2012
Last Annual Update: 2013

GENERAL INFORMATION

Facility Name: INGENCO - Rockville Plant
Location Address: 2369 Lanier Rd
Rockville VA 23146
Mailing Address: 2250 Dabney Rd
Richmond VA 22320

UTM Zone: 18
UTM Vertical (KM): 4175.9
UTM Horizontal (KM): 269.2
Latitude: 37 ° 42 ' 13. " "
Longitude: -77 ° 39 ' 50. " "
Property Area (Acres): 3
No. of Employees: 5
Primary SIC Code: 4931

Annual Update Contact: Troen, Eric
Phone Number: (804) 521 - 3507
Principal Product: cogeneration plant
Comments: Robert Greene retired on 4/1/14 (bbe).
Alt. email: Greener333@gmail.com; Ext.-3514 - Air Contact for 51007-Wythe Power,

Facility Emissions	Pollutant	Emissions Value (tpy)	Allowable Value	Units
	CDC	0.0000027168		
	PM 10	0.0566000000	11.0000000000	tons/yr
	CO	0.1415000000	27.0000000000	tons/yr
	13BUD	0.0000090560		
	PAHI	0.0000198100		
	BZ	0.0000311300		
	PB	0.0000079240	0.2000000000	tons/yr
	PM	0.0566000000	11.0000000000	tons/yr
	PCLB	0.0000000000	0.3000000000	tons/yr
	NO2	1.3018000000	240.0000000000	tons/yr
	CRC	0.0000062260		
	FORM	0.0001584800		
	SEC	0.0000141500		
	NIC	0.0000026036		
	PM2.5	0.0566000000		
	SO2	0.0571660000	22.0000000000	tons/yr
	HGC	0.0000006792		
	VOC	0.0566000000	11.0000000000	tons/yr

STACK INFORMATION: Number: 1 Description: R1 - 16 older Detroit Diesel Engine Generators - 4 stacks

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Consolidated Plant Emissions Report**

Stack Height(ft): 40
 Stack Diameter(ft): 2
 Exit Gas Temperature(F): 600
 Gas Flow Rate(ACFM): 2000
 Exit Gas Velocity(ft/sec): 10.61
 Stack Type: E
 Plume Height(ft): 0
 Permitted Equipment: Y

UTM Zone: 18
 UTM Vertical(KM): 4175.89
 UTM Horizontal(KM): 269.29
 GEP Stack Height: 0
 GEP Building Height: 0
 GEP Building Length: 0
 GEP Building Width: 0
 Rough Terrain: N
 Elevation (ft above MSL): 260

Stack Emissions	Pollutant	Emissions Value (tpy)	Allowable Value	Units
	13BUD	0.0000046800		
	BZ	0.0000160875		
	CDC	0.0000014040		
	CO	0.0731250000		
	CRC	0.0000032175		
	FORM	0.0000819000		
	HGC	0.0000003510		
	NIC	0.0000013455		
	NO2	0.6727500000		
	PAH1	0.0000102375		
	PB	0.0000040950		
	PCLB	0.0000000000		
	PM	0.0292500000		
	PM 10	0.0292500000		
	PM 2.5	0.0292500000		
	SEC	0.0000073125		
	SO2	0.0295425000		
	VOC	0.0292500000		

POINT INFORMATION: Number: 1 Description: Sixteen Detroit Diesel Engine Generators

Design Capacity & Units: 3.2 MILLION BTUS
 Per HOUR
 % Throughput: DEC-FEB: 0 MAR-MAY: 0 JUN-AUG: 100 SEP-NOV: 0
 Operating Schedule: Hours/Day: 16 Days/Week: 5 Hours/Year: 19

State Sensitive: N
 Permitted Equipment: Y
 Space Heat (%): 0
 Air Program Sub Part

Point Emissions	Pollutant	Emissions Value (tpy)	Allowable Value	Units
	13BUD	0.0000046800		
	BZ	0.0000160875		
	CDC	0.0000014040		

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CO	0.0731250000
CRC	0.0000032175
FORM	0.0000819000
HGC	0.0000003510
NIC	0.0000013455
NO2	0.6727500000
PAH1	0.0000102375
PB	0.0000040950
PCLB	0.0000000000
PM	0.0292500000
PM10	0.0292500000
PM2.5	0.0292500000
SEC	0.0000073125
SO2	0.0295425000
VOC	0.0292500000

SEGMENT INFORMATION: Number: 1 Description: Sixteen Detroit Diesel Engine Generators #2 oil

Source Classification Code:	20100101	SCC Description:	Turbine
Actual Annual Throughput:	585	SCC Units:	Million BTUs Fuel Input
Max. Hourly Operation Rate:	3.2	Trace%:	0
State Sensitive:	N	Ash%:	0
Permitted Equipment:	Y	Sulfur%:	1
Insignificant Activity:	N	Heat Content (MMBTU):	1
Pollution Prevention:	N	Throughput Limit:	208696
		Throughput Unit:	Million Btu/Year Heat Input

Pollution Prevention Comments:
 Segment Comments:

Segment Emissions Pollutant	Method	Factor	A/S/T	Primary Control	Secondary Control	Overall Efficiency %	Emissions Value (tpy)	Allowable Value	Units
HGC	Supplied factor (auto calc)	0.0000010000					0.00000035		
NIC	Supplied factor (auto calc)	0.0000050000					0.00000134		
CDC	Supplied factor (auto calc)	0.0000050000					0.00000140		

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CRC	Supplied factor (auto calc)	0.0000110000		0.00000321
PB	Supplied factor (auto calc)	0.0000140000		0.00000409
13BUD	Supplied factor (auto calc)	0.0000160000		0.00000468
SEC	Supplied factor (auto calc)	0.0000250000		0.00000731
PAH1	Supplied factor (auto calc)	0.0000350000		0.00001023
BZ	Supplied factor (auto calc)	0.0000550000		0.00001608
FORM	Supplied factor (auto calc)	0.0002800000		0.00008190
PM	Supplied factor (auto calc)	0.1000000000		0.02925000
PM 10	Supplied factor (auto calc)	0.1000000000		0.02925000
PM 2.5	Supplied factor (auto calc)	0.1000000000		0.02925000
VOC	Supplied factor (auto calc)	0.1000000000		0.02925000
CO	Supplied factor (auto calc)	0.2500000000		0.07312500
SO2	Federal factor (auto calc)	1.0100000000	S	0.02954250
NO2	Supplied factor (auto calc)	2.3000000000		0.67275000

SEGMENT INFORMATION: Number: 2 Description: Sixteen Detroit Diesel Engine Generators - MODEF

Source Classification Code:	20100101	SCC Description:	Turbine
Actual Annual Throughput:	0	SCC Units:	Million BTUs Fuel Input
Max. Hourly Operation Rate:	3.2	Trace%:	0
State Sensitive:	N	Ash%:	0
Permitted Equipment:	Y	Heat Content (MMBTU):	1
Insignificant Activity:	N	Throughput Limit:	
Pollution Prevention:	N	Throughput Unit:	
		Sulfur%:	.1

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Pollution Prevention Comments:
 Segment Comments:

Segment Emissions		Factor	A/S/T	Primary Control	Secondary Control	Overall Efficiency %	Emissions Value (tpy)	Allowable Value	Units
PB	Supplied factor (auto calc)	0.0013000000					0.00000000		
PCLB	Supplied factor (auto calc)	0.0022000000					0.00000000		
PM	Supplied factor (auto calc)	0.1000000000					0.00000000		
PM 10	Supplied factor (auto calc)	0.1000000000					0.00000000		
PM 2.5	Supplied factor (auto calc)	0.1000000000					0.00000000		
VOC	Supplied factor (auto calc)	0.1000000000					0.00000000		
CO	Supplied factor (auto calc)	0.2500000000					0.00000000		
SO2	Federal factor (auto calc)	1.0100000000	S				0.00000000		
NO2	Supplied factor (auto calc)	2.3000000000					0.00000000		

SEGMENT INFORMATION: Number: 3 Description: Sixteen Detroit Diesel Engine Generators - #4 Residual oil

Source Classification Code: 20100101 SCC Description: Turbine
 Actual Annual Throughput: 0 SCC Units: Million BTUs Fuel Input
 Max. Hourly Operation Rate: 3.2 State Sensitive: N Trace%: 0 Ash%: 0 Sulfur%: .1
 Permitted Equipment: Y Heat Content (MMBTU): 1
 Insignificant Activity: N Throughput Limit:
 Pollution Prevention: N Throughput Unit:

Commonwealth of Virginia
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Consolidated Plant Emissions Report

Pollution Prevention Comments:
 Segment Comments:

Segment Emissions Pollutant	Method	Factor	A/S/T	Primary Control		Secondary Control	Overall Efficiency %	Emissions Value (tpy)	Allowable Value	Units
				Control	Control					
PM	Supplied factor (auto calc)	0.1000000000						0.00000000		
PM 10	Supplied factor (auto calc)	0.1000000000						0.00000000		
PM 2.5	Supplied factor (auto calc)	0.1000000000						0.00000000		
VOC	Supplied factor (auto calc)	0.1000000000						0.00000000		
CO	Supplied factor (auto calc)	0.2500000000						0.00000000		
SO2	Federal factor (auto calc)	1.0100000000	S					0.00000000		
NO2	Supplied factor (auto calc)	2.3000000000						0.00000000		

SEGMENT INFORMATION: Number: 4 Description: Generators - Biodiesel

Source Classification Code: 20100101
 Actual Annual Throughput: 0
 Max. Hourly Operation Rate: 3.2
 State Sensitive: N
 Permitted Equipment: N
 Insignificant Activity: N
 Pollution Prevention: N

SCC Description: Turbine
 SCC Units: Million BTUs Fuel Input
 Trace%: 0
 Ash%: 0
 Sulfur%: .001
 Heat Content (MMBTU): 0
 Throughput Limit:
 Throughput Unit:

Pollution Prevention Comments:
 Segment Comments:

Commonwealth of Virginia
Department of Environmental Quality
Consolidated Plant Emissions Report

Segment Emissions		Factor	A/S/T	Primary Control	Secondary Control	Overall Efficiency %	Emissions Value (tpy)	Allowable Value	Units
PM	Supplied factor (auto calc)	0.2981000000					0.00000000		
PM 10	Supplied factor (auto calc)	0.2981000000					0.00000000		
PM 2.5	Supplied factor (auto calc)	0.2981000000					0.00000000		
VOC	Supplied factor (auto calc)	0.4000000000					0.00000000		
NO2	Supplied factor (auto calc)	0.6986000000					0.00000000		
CO	Supplied factor (auto calc)	0.7701000000					0.00000000		
SO2	Supplied factor (auto calc)	1.0100000000					0.00000000		

STACK INFORMATION: Number: 2 Description: R2 - 24 newer Detroit Diesel engine generators - eight stacks

Stack Height(ft):	26	UTM Zone:	18
Stack Diameter(ft):	1	UTM Vertical(KM):	4175.9
Exit Gas Temperature(F):	850	UTM Horizontal(KM):	269.3
Gas Flow Rate(ACFM):	2507	GEP Stack Height:	0
Exit Gas Velocity(ft/sec):	53.2	GEP Building Height:	0
		GEP Building Length:	0
		GEP Building Width:	0
Stack Type:	E	Rough Terrain:	N
Plume Height(ft):	0	Elevation (ft above MSL):	260
Permitted Equipment:	Y		

Stack Emissions	Pollutant	Emissions Value (tpy)	Allowable Value	Units
	13BUD	0.0000043760		
	BZ	0.0000150425		
	CDC	0.0000013128		
	CO	0.0683750000		
	CRC	0.0000030085		
	FORM	0.0000765800		
	HGC	0.0000003282		
	NIC	0.0000012581		
	NO2	0.6290500000		
	PAHI	0.0000095725		

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PB	0.0000038290
PM	0.0273500000
PM 10	0.0273500000
PM 2.5	0.0273500000
SEC	0.0000068375
SO2	0.0276235000
VOC	0.0273500000

POINT INFORMATION: Number: 2 Description: Twenty four Detroit Diesel engine generators

Design Capacity & Units: 3.2 MILLION BTUS
 Per HOUR

% Throughput: DEC-FEB: 0 MAR-MAY: 0 JUN-AUG: 100 SEP-NOV: 0
 Operating Schedule: Hours/Day: 16 Days/Week: 5 Hours/Year: 14

State Sensitive: N
 Permitted Equipment: Y
 Space Heat (%): 0
 Air Program Sub Part

Point Emissions	Pollutant	Emissions Value (tpy)	Allowable Value Units
	13BUD	0.0000043760	
	BZ	0.0000150425	
	CDC	0.0000013128	
	CO	0.0683750000	
	CRC	0.0000030085	
	FORM	0.0000765800	
	HGC	0.0000003282	
	NIC	0.0000012581	
	NO2	0.6290500000	
	PAH1	0.0000095725	
	PB	0.0000038290	
	PM	0.0273500000	
	PM 10	0.0273500000	
	PM 2.5	0.0273500000	
	SEC	0.0000068375	
	SO2	0.0276235000	
	VOC	0.0273500000	

SEGMENT INFORMATION: Number: 1 Description: Twenty four Detroit Diesel Engine Generators - #2 oil

Source Classification Code: 20100101 SCC Description: Turbine
 Actual Annual Throughput: 547 SCC Units: Million BTUs Fuel Input
 Max. Hourly Operation Rate: 3.2 Trace%: 0 Ash%: 0 Sulfur%: .1
 State Sensitive: N
 Permitted Equipment: Y Heat Content (MMBTU): 1

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Insignificant Activity: N
 Pollution Prevention: N

Throughput Limit:
 Throughput Unit:

Pollution Prevention Comments:

Segment Comments:

Segment Pollutant	Emissions Method	Factor	A/S/T	Control		Overall Efficiency %	Emissions Value (tpy)	Allowable Value	Units
				Primary	Secondary				
HGC	Federal factor (auto calc)	0.0000010000					0.00000032		
NIC	Federal factor (auto calc)	0.0000050000					0.00000125		
CDC	Federal factor (auto calc)	0.0000050000					0.00000131		
CRC	Federal factor (auto calc)	0.0000110000					0.00000300		
PB	Federal factor (auto calc)	0.0000140000					0.00000382		
13BUD	Federal factor (auto calc)	0.0000160000					0.00000437		
SEC	Federal factor (auto calc)	0.0000250000					0.00000683		
PAH1	Federal factor (auto calc)	0.0000350000					0.00000957		
BZ	Federal factor (auto calc)	0.0000550000					0.00001504		
FORM	Federal factor (auto calc)	0.0002800000					0.00007658		
PM	Supplied factor (auto calc)	0.1000000000					0.02735000		
PM 10	Supplied factor (auto calc)	0.1000000000					0.02735000		

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PM 2.5	Supplied factor (auto calc)	0.1000000000	0.02735000
VOC	Supplied factor (auto calc)	0.1000000000	0.02735000
CO	Supplied factor (auto calc)	0.2500000000	0.06837500
SO2	Federal factor (auto calc)	1.0100000000 S	0.02762350
NO2	Supplied factor (auto calc)	2.3000000000	0.62905000

SEGMENT INFORMATION: Number: 2 Description: Twenty four Detroit Diesel engine generators - MODEP

Source Classification Code:	20100101	SCC Description:	Turbine
Actual Annual Throughput:	0	SCC Units:	Million BTUs Fuel Input
Max Hourly Operation Rate:	3.2	Trace%:	0
State Sensitive:	N	Ash%:	0
Permitted Equipment:	Y	Sulfur%:	.1
Insignificant Activity:	N	Heat Content (MMBTU):	1
Pollution Prevention:	N	Throughput Limit:	
		Throughput Unit:	

Pollution Prevention Comments:
 Segment Comments:

Segment Emissions		Factor	A/S/T	Primary Control	Secondary Control	Overall Efficiency %	Emissions Value (tpy)	Allowable Value	Units
PB	Supplied factor (auto calc)	0.0013000000					0.00000000		
PM	Supplied factor (auto calc)	0.1000000000					0.00000000		
PM 10	Supplied factor (auto calc)	0.1000000000					0.00000000		
PM 2.5	Supplied factor (auto calc)	0.1000000000					0.00000000		
VOC	Supplied factor (auto calc)	0.1000000000					0.00000000		
CO	Supplied factor (auto calc)	0.2500000000					0.00000000		

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SO2	Federal factor (auto calc)	1.0100000000	S	0.000000000
NO2	Supplied factor (auto calc)	2.3000000000		0.000000000

SEGMENT INFORMATION: Number: 3 Description: Twenty four Detroit Diesel engine generators - #4 residual oil

Source Classification Code:	20100101	SCC Description:	Turbine
Actual Annual Throughput:	0	SCC Units:	Million BTUs Fuel Input
Max. Hourly Operation Rate:	3.2	Trace%:	0
State Sensitive:	N	Ash%:	0
Permitted Equipment:	Y	Sulfur%:	.1
Insignificant Activity:	N	Heat Content (MMBTU):	1
Pollution Prevention:	N	Throughput Limit:	
		Throughput Unit:	

Pollution Prevention Comments:
 Segment Comments:

Segment Emissions Pollutant	Method	Factor	A/S/T	Primary Control	Secondary Control	Overall Efficiency %	Emissions Value (tpy)	Allowable Value	Units
PM	Supplied factor (auto calc)	0.1000000000					0.00000000		
PM 10	Supplied factor (auto calc)	0.1000000000					0.00000000		
PM 2.5	Supplied factor (auto calc)	0.1000000000					0.00000000		
VOC	Supplied factor (auto calc)	0.1000000000					0.00000000		
CO	Supplied factor (auto calc)	0.2500000000					0.00000000		
SO2	Federal factor (auto calc)	1.0100000000	S				0.00000000		
NO2	Supplied factor (auto calc)	2.3000000000					0.00000000		

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SEGMENT INFORMATION: Number: 4

Description: engine generators - Biodiesel

Source Classification Code:	20100101	SCC Description:	Turbine
Actual Annual Throughput:	0	SCC Units:	Million BTUs Fuel Input
Max. Hourly Operation Rate:	3.2	Trace%:	0
State Sensitive:	N	Ash%:	0
Permitted Equipment:	N	Heat Content (MMBTU):	0
Insignificant Activity:	N	Throughput Limit:	
Pollution Prevention:	N	Throughput Unit:	

Pollution Prevention Comments:
Segment Comments:

Segment Emissions Pollutant	Method	Factor	A/S/T	Primary Control	Secondary Control	Overall Efficiency %	Emissions Value (tpy)	Allowable Value	Units
PM	Supplied factor (auto calc)	0.2981000000					0.00000000		
PM 10	Supplied factor (auto calc)	0.2981000000					0.00000000		
PM 2.5	Supplied factor (auto calc)	0.2981000000					0.00000000		
VOC	Supplied factor (auto calc)	0.4000000000					0.00000000		
NO2	Supplied factor (auto calc)	0.6886000000					0.00000000		
CO	Supplied factor (auto calc)	0.7701000000					0.00000000		
SO2	Supplied factor (auto calc)	1.0100000000					0.00000000		