



5/4/2026

VIA DIVISION PORTAL & ELECTRONIC MAIL TO:

Michael Kennedy, Director
Division for Air Quality
300 Sower Blvd., Second Floor
Frankfort, Kentucky 40601

Re: Title V Significant Revision
East Kentucky Power Cooperative, Inc.
Bluegrass Generating Station
Permit V-21-048
Agency Interest No. 39541

Dear Director Kennedy:

In accordance with 401 KAR 52:020 Section 16, East Kentucky Power Cooperative, Inc. (EKPC) respectfully submits the attached significant revision for the above-referenced permit. Through this application, EKPC requests to increase the source-wide synthetic minor limit for nitrogen oxides (NOx) emissions from 95 tons to 99 tons and the source-wide synthetic minor limit for carbon monoxide (CO) emissions from 245 to 249 tons, both on a rolling 12-month basis. In addition, EKPC requests to remove Operating Limitation 1.b. that applies to ultra-low sulfur fuel oil (ULSFO), and request waiver of the ULSFO performance testing requirement under 40 CFR 60, Subpart GG. The compliance demonstration method for the synthetic minor limits of NOx and CO will be the use of Continuous Emissions Monitors (CEMS).

The requested changes are intended to improve unit reliability and grid stability while maintaining an affordable cost of electricity for Kentucky residents.

This significant revision application is being submitted via the Division's e-portal and a courtesy copy is being provided to the Division and EPA via electronic mail.

Should you have any questions, please contact Kevin Moore at (859) 744-4812.

Sincerely,

Jerry Purvis

Jerry Purvis
Sr. Vice President
Environmental Affairs

4775 Lexington Road
P.O. Box 707
Winchester, Kentucky 40392
www.ekpc.coop

cc via e-mail: Rick Shewekah, DAQ
Zach Bittner, DAQ
Brad Akers, Region IV USEPA (akers.brad@epa.gov)
Kevin Moore, EKPC
Jennifer J. Cave, Stites Harbison PLLC

11147741:v1

4775 Lexington Road
P.O. Box 707
Winchester, Kentucky 40392
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**APPLICATION FOR SIGNIFICANT REVISION OF
PERMIT NO. V-21-048
EAST KENTUCKY POWER COOPERATIVE, INC.
BLUEGRASS GENERATING STATION
LAGRANGE, KENTUCKY
AGENCY INTEREST 39541**

April 24, 2026

**Significant Revision
East Kentucky Power Cooperative, Inc.
Bluegrass Generating Station
Permit V-21-048
Agency Interest 39541**

1. Introduction

Through this application, East Kentucky Power Cooperative, Inc. (EKPC), for its Bluegrass Generating Station (Bluegrass) located in LaGrange, Kentucky, is requesting a significant revision to its existing Title V permit V-21-048. Bluegrass requests to increase the source-wide synthetic minor limit for nitrogen oxides (NO_x) emissions from 95 tons to 99 tons and the source-wide synthetic minor limit for carbon monoxide (CO) emissions from 245 to 249 tons, both on a rolling 12-month basis. In addition, Bluegrass requests to remove Operating Limitation 1.b. that applies to ultra-low sulfur fuel oil (ULSFO), and request waiver of the ULSFO performance testing requirement under 40 CFR 60, Subpart GG. The compliance demonstration method for the synthetic minor limits of NO_x and CO will be the use of Continuous Emissions Monitors (CEMS).

The requested changes are intended to improve unit reliability and grid stability while maintaining an affordable cost of electricity for Kentucky residents. EKPC is requesting the changes become affective by December 2026.

Bluegrass is a currently classified as a Title V/Synthetic Minor source, and is considered a true minor source for all New Source Review (NSR) regulated pollutants except CO and NO_x. Bluegrass accepted synthetic minor limits for CO and NO_x emissions. Additionally, Bluegrass is an area source of hazardous air pollutants (HAPs). After the requested amendment of the Title V permit, Bluegrass will remain a NSR minor source and an area source of HAPs.

The Bluegrass Station consists of the following emission units (EU):

- EU01-03: Three simple cycle combustion turbines (CT),
- EU04: One natural gas heater,
- EU05: One emergency generator,
- EU06: One emergency fire pump, and
- Associated insignificant activities.

EKPC is submitting this application under 401 KAR 52:020, Section 16 for a significant revision of the existing Bluegrass Title V operating permit V-21-048. Specific details of the proposed revision and associated emissions are discussed in Section 2. Section 3 presents the regulatory applicability analysis. Application forms, emissions calculations, proposed permit language, and supporting documents are provided in the appendices.

2. Project Description and Emissions

2.1. Removal of Operating Limitation 1.b.

2.1.1. Description

In the significant revision application dated May 30, 2018, East Kentucky Power Cooperative, Inc. (EKPC) requested to add ULSFO as a backup fuel for all three CT units located at Bluegrass. In the regulatory applicability section for 40 CFR 60 Subpart GG (Subpart GG), EKPC states *“With respect to performance testing, 40 CFR 60.334(b)(2) provides that ‘performance testing is not required for any emergency fuel’ which is defined as ‘a fuel fired by a gas turbine only during circumstances, such as natural gas supply curtailment or breakdown of delivery system, that make it impossible to fire natural gas in the gas turbine.’ Since fuel oil will only be used at Bluegrass as emergency backup fuel, this exception will apply.”* EKPC further requested that the permit expressly state that the performance testing on fuel oil is not required. As such, KDAQ incorporated Testing Requirement 3.d. into the Title V that excludes testing on “emergency fuels” but also included Operating Limitation 1.b. that restricts the operation on fuel oil such that it meets the definition of “emergency fuel.”

“Firing on fuel oil is restricted to emergency circumstances such as natural gas supply curtailment or breakdown of delivery system, that make it impossible to fire natural gas in the gas turbine [40 CFR 60.331]. Firing on fuel oil is also permissible when required for maintenance and readiness testing.”

When permitted, the intent was for ULSFO to be a back-up “emergency fuel.” However, because circumstances have changed since 2018, EKPC requests the capability to operate on ULSFO to provide the lowest cost and most reliable electricity to Kentucky residents.

For instance, recently, during Winter Storm Fern (Fern) the availability of natural gas was limited. Thus, Natural gas spot prices increased dramatically because gas marketers pushed gas prices in excess of \$100/MMBtu. During the event, natural gas prices for Bluegrass reached as high as \$76/MMBtu when it typically ranges from \$3-4/MMBtu. In comparison, strictly evaluating a fuel cost \$/MMBtu perspective, Bluegrass’s on-site inventory of ULSFO cost was only ~\$20/MMBtu, a price almost 4 times lower than the elevated natural gas prices. The gas pipeline conditions never warranted a curtailment of natural gas, forcing EKPC to purchase the needed fuel at these exorbitant prices to maintain reliable operations in lieu of the less expensive ULSFO. This market moment hurts rural Kentuckians pocketbooks through the fuel adjustment clause.

However, \$/MMBtu was not the only factor for such extraordinarily high overall costs to Kentucky residents. To further compound the issue, Bluegrass could not just purchase natural gas from the supplier at this higher price for the few hours of the day necessary and called upon to operate. Bluegrass was required to purchase and use 24 hours’ worth of natural gas at the maximum hourly burn rate of the combustion turbine units. If Bluegrass was able to utilize the on-site inventory of ULSFO, the units could have operated as needed at a much lower cost offsetting the exceedingly high natural gas cost.

Unfortunately, throughout the majority of Winter Storm Fern, the gas supplier did not "curtail" therefore, there were no natural gas pipeline infrastructure or supply issues that constituted "emergency circumstances" as defined in Operating Limitation 1.b of the Title V permit. Therefore, the permit did not allow Bluegrass the ability to switch to ULSFO.

Fuel costs are a direct pass through to its customers. The spikes in natural gas prices experienced during Winter Storm Fern significantly impacted customer bills as evidenced by the Public Service Commission's (PSC) approval of EKPC's request related to Winter Storm Fern. EKPC petitioned PSC to allow rate increase mitigation measures and spread-out high fuel costs over several months rather than a one-time massive rate hike (otherwise, monthly electric bills would have doubled or tripled).

To alleviate this issue, EKPC proposes to provide fuel flexibility for the combustion turbines, Bluegrass requests that the Division remove all reference to ULSFO as an "emergency fuel" and any associated operating limitations in the Title V permit. See Appendix D for proposed permit changes.

2.1.2. Emissions

In the May 2018 application, the potential to emit (PTE) of the combustion turbines on ULSFO was calculated assuming 48 hours of operation as a back-up fuel. Removing the classification as an "emergency fuel," will result in a calculated increase to PTE because the units will have the capability to operate on ULSFO outside emergency circumstances. However, Bluegrass requests to maintain the synthetic minor limits for NO_x and CO (with NO_x effectively limiting the station's ability to operate) to remain a NSR minor source. Based on the emission rates (manufacturers data from Siemens and AP-42) submitted in the May 2018 application, the synthetic minor limits restrict ULSFO operation sufficiently that all other pollutants remain below NSR major source thresholds and HAP emissions remain below major source thresholds. Tables 1 and 2 below show the PTE for all pollutants based on a NO_x cap of 99 tons (See Section 2.2) versus the major source thresholds.

Table 1 ULSFO Criteria Pollutant PTE versus NSR Thresholds

Pollutant	Potential to Emit (tons/yr)	NSR Thresholds (Tons)	Exceeds Threshold
CO	43.19	250	X
NO _x	99.00	100	X
PM/PM ₁₀ /PM _{2.5}	17.67	250	X
SO ₂	30.01	250	X
VOC	8.13	100	X
lead	0.01	10	X
CO ₂	97,126	250	NA
CH ₄	3.94	NA	NA
N ₂ O	0.79	NA	NA
CO ₂ e ¹	97,445	NA	□

1: Only applicable if a source is major for another regulated NSR pollutant

Other than CO₂e, no NSR regulated air pollutant exceeds major source thresholds. However, CO₂e alone does not cause a source to be a major source under NSR. Another regulated NSR pollutant must also be above major source thresholds.

Table 2 ULSFO HAP PTE versus Major Source Thresholds

Pollutant	Potential to Emit (tons/yr)	HAP Major Thresholds (Tons)	Exceeds Threshold
1-3 butadiene	0.01	10	X
Benzene	0.03	10	X
formaldehyde	0.17	10	X
naphthalene	0.02	10	X
PAH	0.02	10	X
arsenic	0.01	10	X
beryllium	0.00	10	X
cadmium	0.03	10	X
chromium	0.01	10	X
lead	0.01	10	X
manganese	0.47	10	X
mercury	0.00	10	X
nickel	0.00	10	X
selenium	0.01	10	X
Total HAP	0.79	25	X

The highest single HAP emission is manganese at 0.47 tons and combined HAP emissions are 0.79 tons, both of which are well below major source thresholds.

For more detailed emissions calculations see Appendix B.

2.2. Synthetic Minor Limit Increase

2.2.1. Description

Bluegrass requests to increase the synthetic minor NO_x emission limitation from 95 to 99 tons and the CO limitation from 245 to 249. The requested increase will remain below NSR major source thresholds. Increasing the synthetic minor limitations will afford Bluegrass additional run time that can be utilized when electricity is needed most. Avoiding the potential dilemma on whether to protect human life by providing power when temperatures are dangerously low or exceeding a permit limit.

As a safeguard, Bluegrass installed and operates CO and NO_x CEMS on all three CTs to ensure that the site remains below synthetic minor limits through sufficient monitoring.

2.2.2. Emissions

There is no physical change or change in operation that would result in a change to emission rates as a result of this change.

2.3. 40 CFR 60, Subpart GG Performance Test Waiver

2.3.1. Description

Under 40 CFR 60, Subpart GG, affected units are required to conduct initial performance testing for NO_x on both primary and backup fuels. However, 40 CFR 60.335(b)(2) states “...*Notwithstanding these requirements, performance testing is not required for any emergency fuel (as defined in 60.331).*” Since ULSFO was classified as an “emergency fuel” when initially permitted, performance testing for NO_x on ULSFO was never conducted. If the classification of “emergency fuel” is removed from ULSFO, Bluegrass understands that performance testing would be required on ULSFO, but requests that this requirement be waived. 40 CFR 60.8(b)(4) allows for waiver of performance testing if “...*the owner or operator of a source has demonstrated by other means that the source is in compliance with the applicable standard...*”

Although 40 CFR 60, Subpart GG does provide an exclusion from the initial compliance demonstration on an “emergency fuel,” it does not provide an exclusion from continuous compliance. 40 CFR 60, Subpart GG requires an affected source to install continuous emission monitors (CEMS) to demonstrate continuous compliance with the NO_x limitation regardless of whether the fuel is an “emergency fuel.” Bluegrass has continuously monitored all NO_x emissions from the three CTs, including all hours of operation when ULSFO was utilized (~5 years’ worth of data)¹. All data recorded during that period

¹ Refer to Appendix C for the CEMS data that has been recorded since implementation of ULSFO firing.

(except data recorded during startup and shutdown) has been used to determine compliance with the 40 CFR 60, Subpart GG standard. Of that data, the highest NO_x concentration recorded by the CEMS across all three units when operating on ULSFO was 66.4 ppm, which occurred during a startup period. When operating near peak load on ULSFO, the CEMS showed NO_x concentrations in the 20-ppm range. Both ppm concentrations are well below the permitted limit of 111 ppm. Therefore, Bluegrass has sufficient CEMS data to “*demonstrate by other means*” that the sources are in compliance with the applicable standard.

Additionally, requiring performance testing would be an unnecessary extra burden and cost. To perform the required testing on all three units at Bluegrass would cost ~\$15,000 for one load range for the test crew. This additional cost is unnecessary due to the available CEMS data and would provide no added benefit for the environment.

2.3.2. Emissions

Waiving the performance test will have no impact to permitted emissions, but would have impacts to emissions from a practical standpoint. Requiring to test all three units on ULSFO will result in increased emissions because of two main reasons. Firstly, conditions may be such that the units are not needed to operate during the period when testing would be required by the permit. Therefore, EKPC would have to run the units at a time when they would otherwise not run only for the purposes to conduct performance testing, resulting in emissions that would otherwise be avoided. Secondly, even if the units are operating, the likelihood would be that the units are operating on natural gas and not ULSFO. It is anticipated that Bluegrass will continue to utilize natural gas as the primary fuel type and ULSFO will be used as a backup fuel. Requiring Bluegrass to test on ULSFO, when it would typically operate on natural gas, will generate extra unnecessary emissions.

Additionally, requiring testing would produce emissions (2-3 tons for 9 hours of testing) that would further consume the NO_x tonnage limitation potentially limiting unit operation at a future time when electric generation is needed the most.

3. Regulatory Applicability Analysis

3.1. New Source Performance Standards

3.1.1. 40 CFR 60, Subpart GG

The three units are currently subject to 40 CFR 60, Subpart GG. The units will continue to be subject to 40 CFR 60, Subpart GG after the change. The only new applicable requirement under subpart GG is the requirement to perform initial performance testing on ULSFO. However, EKPC is requesting waiver of this requirement (see Section 2.3). All other monitoring and recordkeeping required under Subpart GG is currently being performed and will continue.

3.1.2. 40 CFR 60, Subpart KKKK

40 CFR 60, Subpart KKKK applies to stationary combustion turbines with a heat input at peak load equal to or greater than 10 MMBtu/hour that commenced construction, reconstruction or modification after February 18, 2005. The turbines were constructed prior to the applicability date and are considered existing units. Therefore, the applicability of Subpart KKKK depends on whether the change is considered a modification or reconstruction. A modification is defined as “*any physical or operational change to an existing facility which results in an increase in the emission rate to the atmosphere of any pollutant to which a standard applies...*” 40 CFR 60.14(a). The proposed changes do not impact the emission rate to the atmosphere of any pollutant for which a standard applies. Therefore, the change is not a modification. Reconstruction is defined as “*the replacement of components of an existing facility to such an extent that: 1) the fixed capital cost of the new components exceeds 50% of the fixed capital cost that would be required to construct a comparable entirely new facility, and 2: it is technologically and economically feasible to meet the applicable standards set forth in this part.*” 40 CFR 60.15(b). There are no components being changed in this project that would result in capital cost. Therefore, the change is not a reconstruction and Subpart KKKK is not applicable.

3.1.3. 40 CFR 60, Subpart KKKKa

For the same reasoning as illustrated in section 3.1.2 for 40 CFR 60, Subpart KKKK, 40 CFR 60, Subpart KKKKa is not applicable.

3.1.4. 40 CFR 60, Subpart TTTT

40 CFR 60, Subpart TTTT is applicable to any stationary combustion turbine that commenced construction after January 8, 2014 or reconstruction after June 18, 2024. The units were constructed in 2000 and 2001 and not considered reconstruction as discussed in Section 3.1.2. Therefore, 40 CFR 60, Subpart TTTT is not applicable.

3.1.5. 40 CFR 60, Subpart TTTTa

40 CFR 60, Subpart TTTTa is applicable to steam generating units or IGCC that combusts coal. The units are simple cycle combustion turbines. Therefore, 40 CFR 60, Subpart TTTTa is not applicable.

3.2. National Emissions Standards for Hazardous Air Pollutants

3.2.1. 40 CFR 63, Subpart YYYY

40 CFR 63, Subpart YYYY applies to stationary combustion turbines located at a major source of HAP emissions. Bluegrass is and will remain an area source of HAPs after the change. Therefore, 40 CFR 63, Subpart YYYY does not apply.

4. Summary and Conclusion

Bluegrass submits this application for a significant revision to Title V permit V-21-048 to remove the “emergency fuel” classification from ULSFO, increase synthetic minor limits for NO_x and CO, and request waiver of the initial performance test requirement on ULSFO. The changes will reduce unnecessary burden and ensure reliability of the units while providing the least cost of electricity to rural Kentucky residents. After the change, Bluegrass will remain an area source of HAP emissions and continue to be a NSR minor source for all regulated pollutants.

Appendix A

Forms

Division for Air Quality

300 Sower Boulevard
Frankfort, KY 40601
(502) 564-3999

DEP7007AI**Administrative Information**

- ☐ Section AI.1: Source Information
☐ Section AI.2: Applicant Information
☐ Section AI.3: Owner Information
☐ Section AI.4: Type of Application
☐ Section AI.5: Other Required Information
☐ Section AI.6: Signature Block
☐ Section AI.7: Notes, Comments, and Explanations

Additional Documentation

☐ Additional Documentation attached

Source Name: EKPC Bluegrass Generating Station

KY EIS (AFS) #: 21- 185-00036

Permit #: V-21-048

Agency Interest (AI) ID: 39541

Date: April 24, 2026

Section AI.1: Source Information

Physical Location	Street:	<u>3095 Commerce Parkway</u>			
Address:	City:	<u>LaGrange</u>	County:	<u>Oldham</u>	Zip Code: <u>40031</u>
Mailing Address:	Street or P.O. Box:	<u>3095 Commerce Parkway</u>			
	City:	<u>LaGrange</u>	State:	<u>KY</u>	Zip Code: <u>40031</u>

Standard Coordinates for Source Physical Location

Longitude: 85.413 (decimal degrees) **Latitude:** 38.389 (decimal degrees)

Primary (NAICS) Category: Electric Power Generation **Primary NAICS #:** 221112

Classification (SIC) Category:		<u>Electric Power Generation</u>		Primary SIC #: <u>4911</u>	
Briefly discuss the type of business conducted at this site:		<u>Generation of electrical power from fossil fuel combustion</u>			
Description of Area Surrounding Source:	☐ Rural Area	☒ Industrial Park	☐ Residential Area	Is any part of the source located on federal land?	☐ Yes
	☐ Urban Area	☐ Industrial Area	☐ Commercial Area		☒ No
			Number of Employees:	12	
Approximate distance to nearest residence or commercial property: <u>470 feet</u>		Property Area: <u>61.22</u>		Is this source portable? ☐ Yes ☒ No	
What other environmental permits or registrations does this source currently hold or need to obtain in Kentucky?					
NPDES/KPDES: ☒ Currently Hold ☐ Need ☐ N/A					
Solid Waste: ☐ Currently Hold ☐ Need ☒ N/A					
RCRA: ☐ Currently Hold ☐ Need ☒ N/A					
UST: ☐ Currently Hold ☐ Need ☒ N/A					
Type of Regulated Waste Activity:					
☐ Mixed Waste Generator		☒ Generator		☐ Recycler	
☐ U.S. Importer of Hazardous Waste		☐ Transporter		☐ Treatment/Storage/Disposal Facility	
				☐ Other: _____	
				☐ N/A	

Section AI.2: Applicant Information**Applicant Name:** East Kentucky Power Cooperative, Inc.**Title:** (if individual) _____**Mailing Address:** **Street or P.O. Box:** 4775 Lexington Road, PO Box 707**City:** Winchester **State:** KY **Zip Code:** 40392**Email:** (if individual) _____**Phone:** 859-744-4812**Technical Contact****Name:** Kevin Moore**Title:** Manager, Air Quality**Mailing Address:** **Street or P.O. Box:** 4775 Lexington Road, PO Box 707**City:** Winchester **State:** KY **Zip Code:** 40392**Email:** kevin.moore@ekpc.coop**Phone:** 859-745-4157 ext.6221**Air Permit Contact for Source****Name:** Jerry Purvis**Title:** Sr. Vice President, Environmental Affairs**Mailing Address:** **Street or P.O. Box:** 4775 Lexington Road, PO Box 707**City:** Winchester **State:** KY **Zip Code:** 40392**Email:** jerry.purvis@ekpc.coop**Phone:** 859-744-4812

Section AI.3: Owner Information☒ **Owner same as applicant****Name:** _____**Title:** _____**Mailing Address:** **Street or P.O. Box:** _____
City: _____ **State:** _____ **Zip Code:** _____**Email:** _____**Phone:** _____**List names of owners and officers of the company who have an interest in the company of 5% or more.****Name****Position**

Section AI.4: Type of Application

Current Status:	☒ Title V	☐ Conditional Major	☐ State-Origin	☐ General Permit	☐ Registration	☐ None
Requested Action: (check all that apply)	☐ Name Change	☐ Initial Registration	☒ Significant Revision	☐ Administrative Permit Amendment		
	☐ Renewal Permit	☐ Revised Registration	☐ Minor Revision	☐ Initial Source-wide Operating Permit		
	☐ 502(b)(10) Change	☐ Extension Request	☐ Addition of New Facility	☐ Portable Plant Relocation Notice		
	☐ Revision	☐ Off Permit Change	☐ Landfill Alternate Compliance Submittal	☐ Modification of Existing Facilities		
	☐ Ownership Change	☐ Closure				
Requested Status:	☒ Title V	☐ Conditional Major	☐ State-Origin	☐ PSD	☐ NSR	☐ Other: _____

Is the source requesting a limitation of potential emissions?☒ Yes ☐ No

Pollutant:	Requested Limit:	Pollutant:	Requested Limit:
☐ Particulate Matter	_____	☐ Single HAP	_____
☐ Volatile Organic Compounds (VOC)	_____	☐ Combined HAPs	_____
☒ Carbon Monoxide	249	☐ Air Toxics (40 CFR 68, Subpart F)	_____
☒ Nitrogen Oxides	99	☐ Carbon Dioxide	_____
☐ Sulfur Dioxide	_____	☐ Greenhouse Gases (GHG)	_____
☐ Lead	_____	☐ Other	_____

For New Construction:
Proposed Start Date of Construction:
 (MM/YYYY)

Proposed Operation Start-Up Date: (MM/YYYY)
For Modifications:
Proposed Start Date of Modification:
 (MM/YYYY)

Proposed Operation Start-Up Date: (MM/YYYY)

Applicant is seeking coverage under a permit shield.
☒ Yes☐ No
Identify any non-applicable requirements for which permit shield is sought on a separate attachment to the application.

Section AI.5 Other Required Information

Indicate the documents attached as part of this application:

- | | |
|--|---|
| ☐ DEP7007A Indirect Heat Exchangers and Turbines | ☐ DEP7007CC Compliance Certification |
| ☐ DEP7007B Manufacturing or Processing Operations | ☐ DEP7007DD Insignificant Activities |
| ☐ DEP7007C Incinerators and Waste Burners | ☐ DEP7007EE Internal Combustion Engines |
| ☐ DEP7007F Episode Standby Plan | ☐ DEP7007FF Secondary Aluminum Processing |
| ☐ DEP7007J Volatile Liquid Storage | ☐ DEP7007GG Control Equipment |
| ☐ DEP7007K Surface Coating or Printing Operations | ☐ DEP7007HH Haul Roads |
| ☐ DEP7007L Mineral Processes | ☐ Confidentiality Claim |
| ☐ DEP7007M Metal Cleaning Degreasers | ☐ Ownership Change Form |
| ☒ DEP7007N Source Emissions Profile | ☐ Secretary of State Certificate |
| ☐ DEP7007P Perchloroethylene Dry Cleaning Systems | ☐ Flowcharts or diagrams depicting process |
| ☐ DEP7007R Emission Offset Credit | ☐ Digital Line Graphs (DLG) files of buldings, roads, etc. |
| ☐ DEP7007S Service Stations | ☐ Site Map |
| ☐ DEP7007T Metal Plating and Surface Treatment Operations | ☐ Map or drawing depicting location of facility |
| ☒ DEP7007V Applicable Requirements and Compliance Activities | ☐ Safety Data Sheet (SDS) |
| ☐ DEP7007Y Good Engineering Practice and Stack Height Determination | ☐ Emergency Response Plan |
| ☐ DEP7007AA Compliance Schedule for Non-complying Emission Units | ☐ Other: _____ |
| ☐ DEP7007BB Certified Progress Report | |

Section AI.6: Signature Block

I, the undersigned, hereby certify under penalty of law, that I am a responsible official*, and that I have personally examined, and am familiar with, the information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the information is on knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false or incomplete information, including the possibility of fine or imprisonment.

Jerry Purvis

Authorized Signature

5/4/2026

Date

Jerry Purvis

Type or Printed Name of Signatory

Sr. VP, Environmental Affairs

Title of Signatory

*Responsible official as defined by 401 KAR 52:001.

Section AI.7: Notes, Comments, and Explanations

<div>Division for Air Quality</div> <div>300 Sower Boulevard</div> <div>Frankfort, KY 40601</div> <div>(502) 564-3999</div>				<div>DEP7007N</div> <div>Source Emissions Profile</div> <div><div>___ Section N.1: Emission Summary</div><div>___ Section N.2: Stack Information</div><div>___ Section N.3: Fugitive Information</div><div>___ Section N.4: Notes, Comments, and Explanations</div></div> <div><div>Additional Documentation</div><div>___ Complete DEP7007AI</div></div>												
Source Name:				EKPC Bluegrass Generating Station												
KY EIS (AFS) #:				21- 185-00036												
Permit #:				V-21-048												
Agency Interest (AI) ID:				39541												
Date:				April 24, 2026												
N.1: Emission Summary																
Emission Unit #	Emission Unit Name	Process ID	Process Name	Control Device Name	Control Device ID	Stack ID	Maximum Design Capacity (SCC Units/hour)	Pollutant	Uncontrolled Emission Factor (lb/SCC Units)	Emission Factor Source (e.g. AP-42, Stack Test, Mass Balance)	Capture Efficiency (%)	Control Efficiency (%)	Hourly Emissions		Annual Emissions	
													Uncontrolled Potential (lb/hr)	Controlled Potential (lb/hr)	Uncontrolled Potential (tons/yr)	Controlled Potential (tons/yr)
01-03	GTG-1-3	2	ULSFO			01-03	2124	CO	0.07251	Vendor Data			154.01	154.01	43.19	43.19
01-03	GTG-1-3	2	ULSFO			01-03	2124	Nox	0.1662	Vendor Data			353.01	353.01	99.00	99.00
01-03	GTG-1-3	2	ULSFO			01-03	2124	PM	0.02966	Vendor Data			63.00	63.00	17.67	17.67
01-03	GTG-1-3	2	ULSFO			01-03	2124	SO2	0.05038	Vendor Data			107.01	107.01	30.01	30.01
01-03	GTG-1-3	2	ULSFO			01-03	2124	VOC	0.01365	Vendor Data			28.99	28.99	8.13	8.13
01-03	GTG-1-3	2	ULSFO			01-03	2124	CO2	163.05	Table C-1 Part 98			346,326	346,326	97,126	97,126
01-03	GTG-1-3	2	ULSFO			01-03	2124	CH4	0.0066	Table C-2 Part 98			14.05	14.05	3.94	3.94
01-03	GTG-1-3	2	ULSFO			01-03	2124	N2O	0.0013	Table C-2 Part 98			2.81	2.81	0.79	0.79
01-03	GTG-1-3	2	ULSFO			01-03	2124	CO2e	NA	Table A-1 Part 98			347,464	347,464	97,445	97,445

<div>Division for Air Quality</div> <div>300 Sower Boulevard</div> <div>Frankfort, KY 40601</div> <div>(502) 564-3999</div>	<div>DEP7007N</div> <div>Source Emissions Profile</div> <div><div>___ Section N.1: Emission Summary</div><div>___ Section N.2: Stack Information</div><div>___ Section N.3: Fugitive Information</div><div>___ Section N.4: Notes, Comments, and Explanations</div></div>	<div>Additional Documentation</div> <div>___ Complete DEP7007AI</div>
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Source Name:	EKPC Bluegrass Generating Station
KY EIS (AFS) #:	21- 185-00036
Permit #:	V-21-048
Agency Interest (AI) ID:	39541
Date:	April 24, 2026

N.1: Emission Summary

Emission Unit #	Emission Unit Name	Process ID	Process Name	Control Device Name	Control Device ID	Stack ID	Maximum Design Capacity (SCC Units/hour)	Pollutant	Uncontrolled Emission Factor (lb/SCC Units)	Emission Source (e.g. AP-42, Stack Test, Mass Balance)	Capture Efficiency (%)	Control Efficiency (%)	Hourly Emissions		Annual Emissions	
													Uncontrolled Potential (lb/hr)	Controlled Potential (lb/hr)	Uncontrolled Potential (tons/yr)	Controlled Potential (tons/yr)
01-03	GTG-1-3	2	ULSFO			01-03	2124	1-3 butadiene	0.000016	AP-42 Table 3.1-4			0.03	0.03	0.01	0.01
01-03	GTG-1-3	2	ULSFO			01-03	2124	benzene	0.000055	AP-42 Table 3.1-4			0.12	0.12	0.03	0.03
01-03	GTG-1-3	2	ULSFO			01-03	2124	formaldehyde	0.00028	AP-42 Table 3.1-4			0.59	0.59	0.17	0.17
01-03	GTG-1-3	2	ULSFO			01-03	2124	naphthalene	0.000035	AP-42 Table 3.1-4			0.07	0.07	0.02	0.02
01-03	GTG-1-3	2	ULSFO			01-03	2124	PAH	0.00004	AP-42 Table 3.1-4			0.08	0.08	0.02	0.02
01-03	GTG-1-3	2	ULSFO			01-03	2124	arsenic	0.000011	AP-42 Table 3.1-5			0.02	0.02	0.01	0.01
01-03	GTG-1-3	2	ULSFO			01-03	2124	beryllium	0.00000031	AP-42 Table 3.1-5			0.00	0.00	0.00	0.00
01-03	GTG-1-3	2	ULSFO			01-03	2124	cadmium	0.000048	AP-42 Table 3.1-5			0.10	0.10	0.03	0.03
01-03	GTG-1-3	2	ULSFO			01-03	2124	chromium	0.000011	AP-42 Table 3.1-5			0.02	0.02	0.01	0.01

<div>Division for Air Quality 300 Sower Boulevard Frankfort, KY 40601 (502) 564-3999</div>	<div>DEP7007N Source Emissions Profile</div> <div>☐ Section N.1: Emission Summary ☐ Section N.2: Stack Information ☐ Section N.3: Fugitive Information ☐ Section N.4: Notes, Comments, and Explanations</div>	<div>Additional Documentation</div> <div>☐ Complete DEP7007AI</div>
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Source Name:	EKPC Bluegrass Generating Station
KY EIS (AFS) #:	21- 185-00036
Permit #:	V-21-048
Agency Interest (AI) ID:	39541
Date:	April 24, 2026

N.1: Emission Summary

Emission Unit #	Emission Unit Name	Process ID	Process Name	Control Device Name	Control Device ID	Stack ID	Maximum Design Capacity (SCC Units/hour)	Pollutant	Uncontrolled Emission Factor (lb/SCC Units)	Emission Factor Source (e.g. AP-42, Stack Test, Mass Balance)	Capture Efficiency (%)	Control Efficiency (%)	Hourly Emissions		Annual Emissions	
													Uncontrolled Potential (lb/hr)	Controlled Potential (lb/hr)	Uncontrolled Potential (tons/yr)	Controlled Potential (tons/yr)
01-03	GTG-1-3	2	ULSFO			01-03	2124	lead	0.000014	AP-42 Table 3.1-5			0.03	0.03	0.01	0.01
01-03	GTG-1-3	2	ULSFO			01-03	2124	manganese	0.00079	AP-42 Table 3.1-5			1.68	1.68	0.47	0.47
01-03	GTG-1-3	2	ULSFO			01-03	2124	mercury	0.0000012	AP-42 Table 3.1-5			0.00	0.00	0.00	0.00
01-03	GTG-1-3	2	ULSFO			01-03	2124	nickel	0.0000046	AP-42 Table 3.1-5			0.01	0.01	0.00	0.00
01-03	GTG-1-3	2	ULSFO			01-03	2124	selenium	0.000025	AP-42 Table 3.1-5			0.05	0.05	0.01	0.01
01-03	GTG-1-3	2	ULSFO			01-03	2124	Total HAP		AP-42 Table 3.1-5			2.83	2.83	0.79	0.79

Section N.2: Stack Information**UTM Zone:**

Stack ID	Identify all Emission Units (with Process ID) and Control Devices that Feed to Stack	Stack Physical Data			Stack UTM Coordinates		Stack Gas Stream Data		
		Equivalent Diameter (ft)	Height (ft)	Base Elevation (ft)	Northing (m)	Easting (m)	Flowrate (acfm)	Temperature (°F)	Exit Velocity (ft/sec)
01	01	23.5	90	800	4250256.21	361382.61	2670000	1160	102.6
02	02	23.5	90	800	4250247.23	361478.56	2670000	1160	102.6
03	03	23.5	90	800	4250256.21	361382.61	2670000	1160	102.6

Section N.3: Fugitive Information**UTM Zone:**

Emission Unit #	Emission Unit Name	Process ID	Area Physical Data		Area UTM Coordinates		Area Release Data	
			Length of the X Side (ft)	Length of the Y Side (ft)	Northing (m)	Easting (m)	Release Temperature (°F)	Release Height (ft)

Section N.4: Notes, Comments, and Explanations

Division for Air Quality

300 Sower Boulevard
Frankfort, KY 40601
(502) 564-3999

DEP7007V

Applicable Requirements and Compliance Activities

- ☐ Section V.1: Emission and Operating Limitation(s)
☐ Section V.2: Monitoring Requirements
☐ Section V.3: Recordkeeping Requirements
☐ Section V.4: Reporting Requirements
☐ Section V.5: Testing Requirements
☐ Section V.6: Notes, Comments, and Explanations

Additional Documentation

☐ Complete DEP7007AI

Source Name: EKPC Bluegrass Generating Station

KY EIS (AFS) #: 21- 185-00036

Permit #: V-21-048

Agency Interest (AI) ID: 39541

Date: April 24, 2026

Section V.1: Emission and Operating Limitation(s)

Emission Unit #	Emission Unit Description	Applicable Regulation or Requirement	Pollutant	Emission Limit (if applicable)	Voluntary Emission Limit or Exemption (if applicable)	Operating Requirement or Limitation (if applicable)	Method of Determining Compliance with the Emission and Operating Requirement(s)
01-03	GTG 1-3; Simple Cycle CTs	401 KAR 52:020	NOx	NA	99 tons; source-wide	NA	CEMS
01-03	GTG 1-3; Simple Cycle CTs	401 KAR 52:020	CO	NA	249 tons; source-wide	NA	CEMS

Section V.2: Monitoring Requirements

Emission Unit #	Emission Unit Description	Pollutant	Applicable Regulation or Requirement	Parameter Monitored	Description of Monitoring
01-03	GTG 1-3; Simple Cycle CTs	NOx	401 KAR 52:020	NOx	No changes to existing monitoring requirements.
01-03	GTG 1-3; Simple Cycle CTs	CO	401 KAR 52:020	CO	No changes to existing monitoring requirements.

Section V.3: Recordkeeping Requirements

Emission Unit #	Emission Unit Description	Pollutant	Applicable Regulation or Requirement	Parameter Recorded	Description of Recordkeeping
01-03	GTG 1-3; Simple Cycle CTs	NO _x	401 KAR 52:020	NO _x	No changes to existing recordkeeping requirements.
01-03	GTG 1-3; Simple Cycle CTs	CO	401 KAR 52:020	CO	No changes to existing recordkeeping requirements.

Section V.4: Reporting Requirements

Emission Unit #	Emission Unit Description	Pollutant	Applicable Regulation or Requirement	Parameter Reported	Description of Reporting
01-03	GTG 1-3; Simple Cycle CTs	NOx	401 KAR 52:020	NOx	No changes to existing reporting requirements.
01-03	GTG 1-3; Simple Cycle CTs	CO	401 KAR 52:020	CO	No changes to existing reporting requirements.

Section V.5: Testing Requirements

Emission Unit #	Emission Unit Description	Pollutant	Applicable Regulation or Requirement	Parameter Tested	Description of Testing
01-03	GTG 1-3	NOx	401 KAR 60:005; 40 CFR 60 Subpart GG; 60.335(b)	NOx concentration limitation	Initial performance testing on ULSFO to demonstrate compliance with NOx limitation. Requesting a waiver of required testing due to CEMS.

Section V.6: Notes, Comments, and Explanations

Appendix B

Emission Calculations

Emission Calculation Procedures

Emissions of regulated and hazardous air pollutants on ULSFO were calculated at steady-state operations using 99 tons of NO_x as a limiting factor. Remaining under 99 tons of NO_x is equivalent to operating approximately 566 hours across all three combustion turbines on ULSFO. Emissions of NO_x, CO, VOC, PM, and SO₂ were calculated using vendor data as provided by Siemens in the original May 2018 application. CO₂, CH₄ and N₂O emissions were calculated using Tables C-1 and C-2 under 40 CFR Subpart 98. CO₂e emissions calculated using global warming potentials from Table A-1 under 40 CFR Subpart 98. Emissions of HAPs were calculated using AP-42 emission factors from Chapter 3.1, Tables 3.1-4 and 3.1-5.

Potential to Emit from ULSFO across all 3 CTs					
Hours of operation: 561 Equivalent to 99 tons of Nox					
Heat input (mmbtu/hr): 2124					
Pollutant	Emission Factor ¹ (kg/MMBtu)	Emission Factor (lb/MMBtu)	Potential to Emit (lbs/hr)	Potential to Emit (tons/yr)	Emission Factor Basis
CO		0.07251	154.01	43.19	Vendor Data ²
Nox		0.1662	353.01	99.00	Vendor Data ²
PM/PM ₁₀ /PM _{2.5}		0.02966	63.00	17.67	Vendor Data ²
SO ₂		0.05038	107.01	30.01	Vendor Data ²
VOC		0.01365	28.99	8.13	Vendor Data ²
CO ₂	73.96	163.05	346,326	97,126	Table C-1 Part 98
CH ₄	0.003	0.0066	14.05	3.94	Table C-2 Part 98
N ₂ O	0.0006	0.0013	2.81	0.79	Table C-2 Part 98
CO ₂ e			347,464	97,445	GWP Table A-1 Part 98
1-3 butadiene		1.60E-05	0.03	0.01	AP-42 Table 3.1-4
Benzene		5.50E-05	0.12	0.03	AP-42 Table 3.1-4
formaldehyde		2.80E-04	0.59	0.17	AP-42 Table 3.1-4
naphthalene		3.50E-05	0.07	0.02	AP-42 Table 3.1-4
PAH		4.00E-05	0.08	0.02	AP-42 Table 3.1-4
arsenic		1.10E-05	0.02	0.01	AP-42 Table 3.1-5
beryllium		3.10E-07	0.00	0.00	AP-42 Table 3.1-5
cadmium		4.80E-05	0.10	0.03	AP-42 Table 3.1-5
chromium		1.10E-05	0.02	0.01	AP-42 Table 3.1-5
lead		1.40E-05	0.03	0.01	AP-42 Table 3.1-5
manganese		7.90E-04	1.68	0.47	AP-42 Table 3.1-5
mercury		1.20E-06	0.00	0.00	AP-42 Table 3.1-5
nickel		4.60E-06	0.01	0.00	AP-42 Table 3.1-5
selenium		2.50E-05	0.05	0.01	AP-42 Table 3.1-5
Total HAP			2.83	0.79	

1: Convert kg/MMBtu to lb/MMBtu using 2.20462 lbs/kg

2: As provided in May 2018 Significant Revision to add ULSFO capabilities.

Appendix C

CEMS NO_x Data

Unit 1 CEMS Data				
Date/Hour	LOAD (MW)	NOx Concentration (ppm)	Oil Operation (mins)	Heat Input (MMBtu/hr)
10/28/2021 07	0	0.6	2	163
10/28/2021 08	6.9	19.3	25	457
10/28/2021 09	101.2	28.1	60	1,244
10/28/2021 10	96.9	28.1	7	1,247
10/10/2022 05	43.7	48	37	788
10/10/2022 06	109.5	31.3	60	1,320
10/10/2022 07	99.6	30.9	8	1,264
12/23/2022 17	0	2.9	2	147
12/23/2022 18	0	6	1	156
12/23/2022 19	0.2	16.6	39	555
12/23/2022 20	100.4	43.7	53	1,255
12/23/2022 23	0	3	2	159
12/24/2022 13	4	17.2	19	498
12/24/2022 14	158.3	32	60	1,740
12/24/2022 15	176.5	16.8	6	1,990
12/24/2022 16	93.6	32.6	56	1,242
12/24/2022 17	173.7	19.7	60	1,853
12/24/2022 18	186.6	16.5	60	1,987
12/24/2022 19	186.7	16.4	60	1,988
12/24/2022 20	186.8	17.3	60	1,988
12/24/2022 21	186.9	18	60	1,989
12/24/2022 22	187	18.2	60	1,990
12/24/2022 23	186.8	17.2	60	1,986
12/25/2022 00	186.8	17.2	60	1,985
12/25/2022 01	186.9	17.2	60	1,986
12/25/2022 02	171.4	19.1	60	1,815
12/25/2022 03	135.8	33.8	60	1,504
12/25/2022 04	128.3	37.4	60	1,441
12/25/2022 05	128	37.5	60	1,439
12/25/2022 06	127.9	37.4	60	1,439
12/25/2022 07	127.9	37.6	60	1,439
12/25/2022 08	127.9	37.7	60	1,438
12/25/2022 09	127.6	37.6	60	1,436
12/25/2022 10	127.6	37.7	60	1,436
12/25/2022 11	127.6	37.5	60	1,436

12/25/2022 12	127.7	36.6	60	1,436
12/25/2022 13	127.6	36.4	60	1,436
12/25/2022 14	127.6	35.6	60	1,435
12/25/2022 15	127.7	35.1	60	1,443
12/25/2022 16	127.7	34.9	60	1,443
12/25/2022 17	127.7	34.7	60	1,443
12/25/2022 18	127.6	34.9	60	1,442
12/25/2022 19	127.6	35.2	60	1,442
12/25/2022 20	127.6	35.5	60	1,443
12/25/2022 21	127.6	35.8	60	1,443
12/25/2022 22	127.6	36.5	60	1,443
12/25/2022 23	127.6	36.9	60	1,444
12/26/2022 00	128.1	37.2	60	1,450
12/26/2022 01	128.1	37.1	60	1,451
12/26/2022 02	128.2	36.9	60	1,451
12/26/2022 03	128.1	36.8	60	1,451
12/26/2022 04	128.1	37	60	1,451
12/26/2022 05	128.1	36.9	60	1,451
12/26/2022 06	128	36.7	60	1,450
12/26/2022 07	128	36.6	60	1,450
12/26/2022 08	127.9	36.6	60	1,450
12/26/2022 09	127.8	36.4	60	1,449
12/26/2022 10	48.4	40	28	885
05/16/2023 12	6.4	27.6	24	481
05/16/2023 13	112.9	25.3	60	1,330
05/16/2023 14	118.2	24.4	60	1,372
05/16/2023 15	28	42.5	21	716
11/16/2023 07	13.8	38.1	24	575
11/16/2023 08	60	36.5	42	946
04/19/2024 13	21.2	33.5	26	617
04/19/2024 14	34.7	48.3	24	750
11/01/2024 12	27.4	44.7	28	658
11/01/2024 13	39.7	48.5	28	780
01/24/2025 08	35.3	38.7	9	769
05/09/2025 12	34	38.3	37	683
05/09/2025 13	30.2	45.5	21	700
11/05/2025 08	78.2	32.1	47	1,054
11/05/2025 09	172.4	35.1	60	1,774
11/05/2025 10	145.6	20	60	1,522

11/05/2025 11	82.1	34.3	57	1,059
Unit 2 CEMS Data				
Date/Hour	LOAD (MW)	NOx Concentration (ppm)	Oil Operation (mins)	Heat Input (MMBtu/hr)
10/29/2021 07	75.6	35	55	1,032
10/29/2021 08	78.6	29.7	24	1,075
10/12/2022 05	6.8	46.7	26	496
10/12/2022 06	57.5	36.9	30	933
10/13/2022 15	46.5	40.6	41	796
10/13/2022 16	80.5	38	53	1,092
12/23/2022 17	0	4.7	1	165
12/23/2022 18	0	5.9	1	161
12/23/2022 19	0	2.5	1	162
12/24/2022 17	79.3	23.5	38	1,119
12/24/2022 18	185.1	20	60	1,999
12/24/2022 19	184.5	19.9	60	1,988
12/24/2022 20	182.2	19.9	60	1,958
12/24/2022 21	182.2	20.2	60	1,957
12/24/2022 22	182.2	20.3	60	1,956
12/24/2022 23	182.1	20.2	60	1,954
12/25/2022 00	182.2	20.2	60	1,953
12/25/2022 01	182.2	20.3	60	1,952
12/25/2022 02	169.9	22	60	1,816
12/25/2022 03	135.3	38.8	60	1,511
12/25/2022 04	128	42.1	60	1,449
12/25/2022 05	128	41.6	60	1,449
12/25/2022 06	128	41.4	60	1,449
12/25/2022 07	128	41.2	60	1,449
12/25/2022 08	128	41.2	60	1,448
12/25/2022 09	128	41.2	60	1,448
12/25/2022 10	128	41.1	60	1,448
12/25/2022 11	128	40.6	60	1,449
12/25/2022 12	128	39.9	60	1,448
12/25/2022 13	128	39.5	60	1,447
12/25/2022 14	128	39	60	1,447
12/25/2022 15	128	38.5	60	1,439
12/25/2022 16	128	38.5	60	1,439
12/25/2022 17	128	38.2	60	1,438

12/25/2022 18	128	38.4	60	1,439
12/25/2022 19	128	38.4	60	1,439
12/25/2022 20	128	38.6	60	1,440
12/25/2022 21	128	38.9	60	1,440
12/25/2022 22	128	39.2	60	1,440
12/25/2022 23	128	39.2	60	1,441
12/26/2022 00	128.1	39.7	60	1,441
12/26/2022 01	128	39.7	60	1,441
12/26/2022 02	128	39.6	60	1,441
12/26/2022 03	128	39.5	60	1,447
12/26/2022 04	128	39.4	60	1,447
12/26/2022 05	128	39.6	60	1,448
12/26/2022 06	128	39.4	60	1,447
12/26/2022 07	128	39.1	60	1,448
12/26/2022 08	128	38.8	60	1,447
12/26/2022 09	113.4	40.2	60	1,340
12/26/2022 10	26.7	42.2	10	748
05/16/2023 14	52.8	36.2	37	876
05/16/2023 15	25.3	43.4	17	676
05/23/2023 11	1.3	29	17	402
05/23/2023 12	24	47.5	10	655
10/04/2023 08	14.7	45.6	24	556
10/04/2023 09	64.5	35	32	956
01/15/2024 09	0	3.5	3	140
01/15/2024 11	0	0.2	2	152
01/15/2024 15	20.4	49.4	36	660
01/15/2024 16	25.1	48.8	13	733
01/31/2024 07	0	9.5	9	267
01/31/2024 08	87.3	45.1	21	1,175
04/24/2024 09	0	12.9	4	157
04/24/2024 10	42.2	42	60	766
04/24/2024 11	23	45.3	3	653
11/05/2024 11	108.9	22.1	1	1,307
11/05/2024 12	11.6	37.6	21	505
11/05/2024 13	44.8	43.3	36	798
05/16/2025 16	8	29.4	23	486
05/16/2025 17	35.3	36.8	28	732
11/05/2025 12	2	28.2	16	426
11/05/2025 13	140.3	37.4	60	1,558

11/05/2025 14	156.5	25.5	60	1,686
11/05/2025 15	130.9	32	60	1,435
11/05/2025 16	97.2	33.1	60	1,169
11/05/2025 17	24.1	44.6	7	688
Unit 3 CEMS Data				
Date/Hour	LOAD (MW)	NOx Concentration (ppm)	Oil Operation (mins)	Heat Input (MMBtu/hr)
11/02/2021 07	70.6	32.2	55	995
11/02/2021 08	83.3	33.3	18	1,123
10/12/2022 12	0	1.6	3	148
10/12/2022 14	0	1.1	3	153
10/12/2022 15	65.4	27.1	55	956
10/12/2022 16	78.8	24.4	19	1,084
05/16/2023 14	0	13.9	12	365
05/16/2023 15	24	49.2	31	691
10/05/2023 08	16.3	26.3	24	563
10/05/2023 09	60.3	28.2	35	928
04/19/2024 07	26.6	20.6	30	668
04/19/2024 08	29.6	42.8	22	727
11/07/2024 13	0.1	19.2	14	416
11/07/2024 14	41	43.2	39	804
05/16/2025 05	30.8	30.5	34	659
05/16/2025 06	24.9	21	16	673
10/30/2025 13	67.6	36.6	38	995
10/31/2025 08	15	22.5	25	544
10/31/2025 09	74	39.4	10	942
10/31/2025 13	67.8	27	43	946
10/31/2025 14	165	32.6	60	1,684
10/31/2025 15	128.1	27.2	60	1,354
10/31/2025 16	29.2	43.9	19	699
11/03/2025 13	0	13.7	10	309
11/03/2025 14	0	53.7	11	349
11/03/2025 15	0	10	5	196
11/04/2025 08	0	12.8	3	114
11/04/2025 09	0	13.2	3	159
11/04/2025 10	0	12.7	5	241
11/04/2025 12	0	66.4	1	3
11/04/2025 13	0	12.9	4	224

11/04/2025 14	0	18.4	7	253
11/04/2025 15	0	4.1	3	165
11/05/2025 11	0	10.9	4	189
11/05/2025 16	0	10	5	230
12/02/2025 09	0	6.5	2	148
12/09/2025 10	0	1.3	1	2
12/09/2025 11	0	3	2	9
12/09/2025 14	0	8	5	165

Appendix D

Proposed Permit Language

SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS**Emissions Unit 01, 02, and 03 Three (3) Natural Gas-Fired, Simple Cycle Combustion Turbines****Description:**

Model: Siemens-Westinghouse 501FD
Construction Commenced: October, 2000 – Emissions Units 01 and 02
June, 2001 – Emissions Unit 03
Maximum Continuous Rating: 2,076 MMBtu/hr rated heat input capacity (each), 208 nominal MW rated capacity output (each)
Primary Fuel: Natural gas
Secondary Fuel: No. 2 Ultra Low Sulfur ~~Diesel~~ Fuel Oil
Control Equipment: Dry-Low NO_x Burners & Water Injection on all three units
~~High Temperature Selective Catalytic Reduction (SCR) on Units 01 & 02~~

Commented [DP1]: Removing as the SCR's are not installed or operational.

APPLICABLE REGULATIONS:

401 KAR 51:160, *NO_x requirements for large utility and industrial boilers*
401 KAR 51:210, *CAIR NO_x annual trading program*
401 KAR 51:220, *CAIR NO_x ozone season Trading Program*
401 KAR 51:230, *CAIR SO₂ trading program*
401 KAR 51:240, *Cross-State Air Pollution Rule (CSAPR) NO_x annual trading program.*
401 KAR 51: 260, *Cross-State Air Pollution Rule (CSAPR) SO₂ group 1 trading program*
401 KAR 52:060, *Acid rain permits*
401 KAR 60:005, Section 2(2)(pp), 40 C.F.R. 60.330 to 60.335 (Subpart GG), *Standards of Performance for Stationary Gas Turbines*
401 KAR 63:020, *Potentially hazardous matter or toxic substances*
40 CFR 75, *Continuous Emissions Monitoring (CEM)*
40 CFR 97, Subpart GGGGG, *CSAPR NO_x Ozone Season Group 3 Trading Program*

PRECLUDED REGULATIONS:

401 KAR 51:017, *Prevention of significant deterioration of air quality*

NON APPLICABLE REGULATIONS:

401 KAR 60:005, Section 2(2)(ffff), 40 C.F.R. 60.4300 to 60.4420, Table 1 (Subpart KKKK), *Standards of Performance for Stationary ~~Gas-Combustion~~ Turbines*
401 KAR 60:005, Section 2(2)(jjjj), 40 C.F.R. 60.5508 to 60.5580, Tables 1 to 3 (Subpart TTTT), *Standards of Performance for Greenhouse Gas Emissions for Electric Generating Units*
401 KAR 63:002, Section 2(4)(dddd), 40 C.F.R. 63.6080 to 63.6175, Tables 1 to 7 (Subpart YYYY), *National Emission Standards for Hazardous Air Pollutants for Stationary Combustion Turbines*
40 C.F.R. 60.4300a to 60.4420a (Subpart KKKKa), Standards of Performance for Stationary Combustion Turbines
40 C.F.R. 60.5508 to 60.5580 (Subpart TTTTa), Standards of Performance for Greenhouse Gas Emissions for Modified Coal-Fired Steam Electric Generating Units and New Construction and Reconstruction Stationary Combustion Turbine Electric Generating Units

STATE ORIGIN REQUIREMENTS:

401 KAR 63:020, *Potentially hazardous matter or toxic substances*

SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)**1. Operating Limitations:**

~~a.~~ Combined operating hours for all turbines shall not exceed 4,757 hours during any consecutive twelve (12) month period [Self-imposed to preclude 401 KAR 51:017].

~~b.~~

~~maintenance and readiness testing.~~

~~e-a.~~ Based upon the emission rates of toxics and hazardous air pollutants provided in the application and supplemental information submitted by the source, the Cabinet determines the affected facility to be in compliance with 401 KAR 63:020.

~~e-b.~~ See Section D for source-wide emission limitations.

Commented [DP2]: Removal of definition of emergency fuel.

2. Emission Limitations:

a. The concentration of nitrogen oxides (NO_x) in the exhaust gas from each unit shall not exceed 111 parts per million (ppm) by volume at 15 percent oxygen, on a dry basis, and based on a four-hour rolling average [40 CFR 60.332(a)(1)].

Compliance Demonstration:

The permittee shall demonstrate compliance by averaging the ppm level of NO_x measured using the NO_x CEM and comparing the result to the NO_x emission standard [40 CFR 60.334(b)]. ~~The NO_x emission rate and mass calculations will be based on prorated natural gas and fuel oil fuel factors from 40 CFR Part 75, Appendix F.~~

Commented [DP3]: Statement not needed. The CEMS measures actual NO_x concentrations regardless of fuel type. No emission rate or mass calculations are necessary to demonstrate compliance.

b. The permittee shall either not discharge any gases into the atmosphere which contain sulfur dioxide (SO₂) in excess of 0.015 percent by volume at 15 percent oxygen, on a dry basis, or not burn any fuel which contains sulfur in excess of 0.8 percent by weight [40 CFR 60.333(a) and (b)].

Compliance Demonstration:

See 4. **Specific Monitoring Requirement d. and f.**

c. Carbon monoxide (CO) emissions shall not exceed 50 ppm on a three-hour rolling average basis from each unit except during start-up, shutdown, and malfunction events. ~~The start-up and shutdown emission calculation shall be based on emission rates determined from representative data derived from actual emissions testing. The CO emissions from the source during start up and shutdown shall be included in the total emission cap of 245 tons per year as specified in Section D of this permit [401 KAR 52:020, Section 10 and Self-imposed to preclude 401 KAR 51:017].~~

Commented [DP4]: Not needed here. This is a source wide limitation that is specified in Section D.

Compliance Demonstration:

The permittee shall demonstrate compliance by averaging the ppm level of CO measured using a CEM and comparing the result to the CO emission standard. ~~The CO emission rate and mass calculations will be based on prorated natural gas and fuel oil fuel factors from 40 CFR Part 75, Appendix F.~~

Commented [DP5]: Same as for NO_x.

d. See Section D for source-wide emission limitations.

SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)**3. Testing Requirements:**

- a. In conducting performance tests for nitrogen oxides as required by 40 CFR 60.8, the permittee shall use either EPA Method 20; ASTM D6522-00 incorporated by reference 40 CFR 60.17; EPA Method 7E and either EPA Method 3 or 3A in Appendix A of Part 60 or other acceptable reference methods or procedures as specified in 40 CFR 60.335 so as to determine compliance with the standard [40 CFR 60.335(a)].
- ~~b. If the permittee elects to install and certify a NOX CEMS under 40 CFR 60.334(e), then the initial performance test required under 40 CFR 60.8 may be done in the following alternative manner using the test data both to demonstrate compliance with the applicable NOX emission limit under 40 CFR 60.332 and to provide the required reference method data for the RATA of the CEMS described under 40 CFR 60.334(b) [40 CFR 60.335(b)(7)(ii)].~~
- ~~c. Performance testing is not required for any emergency fuel as defined in 40 CFR 60.331 [40 CFR 60.335(b)(2)].~~
- ~~d.~~ Testing shall be conducted at such times as may be required by the Cabinet [401 KAR 50:045, Section 4].

Commented [DP6]: Should the applicable requirement be 40 CFR 60.335(b)(6)? 40 CFR 60.335(b)(7)(ii) applies to sources that do not use water or steam injection. Bluegrass does use water injection.

4. Specific Monitoring Requirements:

- a. The permittee shall install, calibrate, maintain, and operate a NOx CEM. The NOx CEM shall be used to demonstrate continuous compliance with the NOx emission standard. Excluding the start-up and shutdown periods, if any four-hour rolling average exceeds the NOx emission limitation, the permittee shall, as appropriate, initiate an investigation of the cause of the exceedance and complete necessary control device/process/CEM repairs or take corrective action as soon as practicable [401 KAR 60:005, 40 CFR 60.334(b), and 40 CFR 75].
- b. The nitrogen oxides CEM shall be used in lieu of the water to fuel monitoring system for reporting excess emissions in accordance with 40 CFR 60.334(b)(3)(iii). The calibration of the water to fuel monitoring device required in 40 CFR 60.334(a) will be replaced by the 40 CFR 75 certification tests of the nitrogen oxides CEMS monitor.
- c. The permittee shall install, calibrate, maintain, and operate a CEM system for measuring oxygen levels [401 KAR 52:020, Section 10].
- d. The permittee shall determine sulfur dioxide emissions by using the heat input calculated using a certified fuel flow monitoring system in conjunction with the default SO2 emission rate for pipeline natural gas from Section 2.3.1 of Appendix D and equation F- 20 in Appendix F [40 CFR 75.11(d)(2)].
- e. The permittee shall comply with all the monitoring requirements of 40 CFR 75.
- f. The permittee shall monitor the sulfur content of the fuel being fired in the turbine. The frequency of determination of these values shall be as specified in the following approved custom fuel monitoring schedule [40 CFR 60.334(h)]:
 - i. The sulfur content of the gaseous fuel shall be determined twice per year. The monitoring shall be conducted during the first and third quarters of each calendar year [401 KAR 52:020, Section 10].

SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

- ii. The permittee may elect not to monitor the total sulfur content of the gaseous fuel combusted in the turbine if the fuel meets the definition of natural gas in 40 CFR 60.331(u) [40 CFR 60.334(h)(3)].
- iii. If there is a change in fuel supply, the permittee shall notify the Division of such change for re-examination of this custom schedule. A substantial change in fuel quality shall be considered a change in fuel supply. Sulfur monitoring shall be conducted weekly during the interim period when this custom schedule is being re-examined [401 KAR 52:020, Section 10].
- iv. When fuel oil is used, the permittee shall sample the fuel oil sulfur content daily in accordance with 40 CFR 75, Appendix D [40 CFR 60.334(i)(1)].
- g. The permittee shall monitor for carbon monoxide, using a CO CEM [401 KAR 52:020, Section 10].
- h. The permittee shall install, calibrate, operate, test, and monitor all continuous monitoring systems and monitoring devices [40 CFR 60.13 or 40 CFR 75]. Verification of operational status shall, as a minimum, include completion of the manufacturer's written requirements or recommendations for installation, operation, and calibration of the device(s).
- i. The permittee shall conduct a performance evaluation of the continuous monitoring system during any performance test required under 40 CFR 60.8 or within 30 days thereafter, in accordance with the applicable performance specification in 40 CFR 60 Appendix B, for NO_x performance evaluations of CEM systems shall be conducted at other times as required [40 CFR 60.13(c)].
- j. For affected facilities that are infrequently operated, an alternative monitoring procedure for CO monitors zero and span calibration checks has been approved by the Director. The permittee shall check the zero and span drift of the CO monitors at least once daily when operating, in accordance with and consistent with NO_x and O₂ monitor requirements under 40 CFR 75. The following provisions shall be adhered to while executing this alternative procedure [401 KAR 59:005 Section 4(9)(b)]:
 - i. Conditions for monitoring emissions data out-of-control periods as defined in 40 CFR 75.24 for CEMS shall apply to the CO monitors including but not limited to failed zero/span checks, and RATA tests. This out-of-control data shall not be used to calculate hourly emissions for the time period considered out-of-control until that time when the appropriate corrective measures specified in 40 CFR 75.24 are successfully completed and the data is back in-control.
 - ii. Data substitution rules shall apply to the CO emissions data for out-of-control periods, including monitoring downtime, and those substituted emission data values shall count toward the facility source-wide annual federally enforceable CO emissions limit. For the purpose of complying with this requirement, the data substitution rules for NO_x monitors listed in 40 CFR 75.33 shall be applied to the CO monitors.

SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

- k. Except during system breakdowns, repairs, calibration checks, and zero and span adjustments required under 40 CFR 60.13(d), all continuous monitoring systems shall be in continuous operation and shall meet the minimum frequency of operation requirements by completing one cycle of operation (sampling, analyzing, and data recording) for each successive fifteen (15) minute period [40 CFR 60.13(e)].
 - l. All continuous monitoring systems or monitoring devices shall be installed such that representative measurements of emissions or process parameters from the emissions units are obtained. Additional procedures for location of continuous monitoring systems, as contained in the applicable Performance Specifications of 40 CFR 60 Appendix B, shall be used [40 CFR 60.13(f)].
 - m. The permittee shall reduce all data to one-hour averages for the continuous monitoring systems. The one-hour averages shall be computed from four or more data points equally spaced over each one-hour period. Data recorded during periods of continuous monitoring system breakdowns, repairs, calibration checks, and zero and span adjustments shall not be included in the data averages computed. An arithmetic or integrated average of all data may be used. The data may be recorded in reduced or non-reduced form (e.g., ppm pollutant and percent oxygen). All excess emissions shall be converted into units of the applicable standard using the applicable conversion procedures specified in 40 CFR 60, Subpart GG. After conversion into units of the standard, the data may be rounded to the same number of significant digits as used to specify the applicable emission standard [40 CFR 60.13(h)].
 - n. The permittee shall monitor operating parameters for ~~SCR and~~ low NO_x burners [401 KAR 52:020, Section 10].
 - o. The permittee shall monitor the quantity of fuel oil (in 1000 gallons), and natural gas (in MMscf), fired in each turbine, for any consecutive 12 month rolling total [401 KAR 52:020, Section 10].
 - p. The permittee on a daily basis shall monitor the hours of operation for each turbine and fuel used. ~~If fuel oil is used the reason for the fuel oil use shall be monitored~~ [401 KAR 52:020, Section 10].
- 5. Specific Recordkeeping Requirements:**
- a. The permittee of the gas turbine shall maintain a file of all measurements, including continuous monitoring system, monitoring device, and performance testing measurements; all continuous monitoring system performance evaluations; all continuous monitoring system or monitoring device calibration checks; adjustments and maintenance performed on these systems and devices; and all other information required by 401 KAR 59:005 recorded in a permanent form suitable for inspection [401 KAR 59:005, Section 3].
 - b. The permittee shall maintain records, including those documenting the results of each compliance test and all other records and reports required by this permit, and shall be maintained for five (5) years [401 KAR 52:020, Section 3].

SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

- c. The permittee shall maintain the records of the occurrence and duration of any start-up, shutdown, or malfunction in the operation of the emissions units; any malfunction of the air pollution control equipment; or any period during which a continuous monitoring system or monitoring device is inoperative [401 KAR 52:020, Section 10].
 - d. The permittee shall maintain a log of all sulfur content measurements. Records of sample analysis and fuel supply data pertinent to the custom fuel sulfur monitoring schedule shall be retained for a period of five (5) years, and shall be available for inspection by personnel of federal, state, and local air pollution control agencies [401 KAR 52:020, Section 10].
 - e. The permittee shall maintain records of operating parameters of the control equipment [401 KAR 59:005, Section 3].
 - f. The permittee shall maintain a log ~~of the rolling total~~ of the quantity of fuel oil (in 1000 gallons), and natural gas (in MMscf), fired in each turbine, for any consecutive 12 month rolling total [401 KAR 52:020, Section 10].
 - g. The permittee on a daily basis shall record the hours of operation for each turbine and fuel used. ~~If fuel oil is used the reason for the fuel oil use shall be recorded~~ [401 KAR 52:020, Section 10].
- 6. Specific Reporting Requirements:**
- a. The minimum data reporting requirements, which follow, shall be maintained and furnished in the format specified by the Cabinet. The permittee shall submit a written report of excess emissions (as defined in applicable sections) to the cabinet for every calendar quarter. All quarterly reports shall be postmarked by the thirtieth (30th) day following the end of each calendar quarter and shall include the following information [401 KAR 59:005, Section 3]:
 - i. The magnitude of the excess emissions computed in accordance with 401 KAR 59:005, Section 4(8), any conversion factors used, and the date and time of commencement and completion of each time period of excess emissions
 - ii. Specific identification of each period of excess emission that occurs during start-ups, shutdowns, and malfunctions of the emission unit including the nature and cause of any malfunction (if known), the corrective action taken or preventive measures adopted.
 - iii. The date and time identifying each period during which the continuous monitoring system was inoperative, except for zero and span checks, and the nature of the system repairs or adjustments.
 - iv. When no excess emissions have occurred or the continuous monitoring system(s) has not been inoperative, repaired, or adjusted, such information shall be stated in the report.

- b. For the reports regarding NO_x excess emissions, in lieu of those based on the water to fuel ratio monitoring, periods of excess emissions are defined for turbines using NO_x and diluent CEMS as follows [40 CFR 60.334(j)(1)]:
 - i. An hour of excess emissions shall be any unit operating hour in which the 4-hour rolling average NO_x concentration exceeds the applicable emission limit in 40 CFR 60.332(a)(1) or (2). For the purposes of 40 CFR 60, Subpart GG, a “4-hour rolling average NO_x concentration” is the arithmetic average of the average NO_x concentration measured by the CEMS for a given hour (corrected to 15 percent O₂ and, if required under 40 CFR 60.335(b)(1), to ISO standard conditions) and the three unit operating hour average NO_x concentrations immediately preceding that unit operating hour.
 - ii. A period of monitor downtime shall be any unit operating hour in which sufficient data are not obtained to validate the hour, for either NO_x concentration or diluent (or both).
 - iii. Each report shall include the ambient conditions (temperature, pressure, and humidity) at the time of the excess emission period and (if the permittee has claimed an emission allowance for fuel bound nitrogen) the nitrogen content of the fuel during the period of excess emissions. The permittee does not have to report ambient conditions if the permittee opts to use the ~~worst-case~~ worst-case ISO correction factor as specified in 40 CFR 60.334(b)(3)(ii), or if the permittee is not using the ISO correction equation under the provisions of 40 CFR 60.335(b)(1).
 - c. Excess emissions of SO₂ are defined by each unit operating hour included in the period beginning on the date and hour of any sample (or as otherwise required in the custom fuel sulfur monitoring plan) for which the sulfur content of the fuel being fired in the gas turbine(s) exceeds the limitations set forth in **2. Emission Limitations**; and ending on the date and hour that a subsequent sample is taken that demonstrates compliance. These periods of excess emissions shall be reported quarterly [40 CFR 60.334(j)(2)].
 - d. See **Section F**.
- 7. Specific Control Equipment Operating Conditions:**
- ~~a. The permittee has the option to apply high temperature selective catalytic reduction (SCR) for NO_x control in its operation after initial demonstration of compliance with emission limitation set forth in 2. Emission Limitations. The NO_x emissions limitations shall not exceed the permit limit when the SCR system is not in use. The total emission cap for the facility shall not exceed the limit established in Section D [401 KAR 50:055, Section 2].~~
 - ~~b. a.~~ The dry low-NO_x burners shall be operated while burning natural gas to maintain compliance with permitted emission limitations, in accordance with manufacturer's specifications and/or standard operating practices [401 KAR 50:055, Section 2].
 - ~~e. b.~~ The water injection systems shall be operated while burning fuel oil to maintain compliance with permitted emission limitations, in accordance with manufacturer's specifications and/or standard operating practices [401 KAR 50:055 Section 2].
 - ~~d. c.~~ See **Section E, Source Control Equipment Requirements**, for further requirements.

SECTION D - SOURCE EMISSION LIMITATIONS AND TESTING REQUIREMENTS

1. As required by Section 1b of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26; compliance with annual emissions and processing limitations contained in this permit, shall be based on emissions and processing rates for any twelve (12) consecutive months.
2. Emissions of NO_x and CO, measured by applicable reference methods, or an equivalent or alternative method specified in 40 C.F.R. Chapter I, or by a test method specified in the state implementation plan shall not exceed the respective limitations specified herein.
3. For the gas combustion turbines, ~~electric generator, fire water pump, and~~ natural gas heater, emergency generator and emergency fire pump (Emission Units 01-06):
 - a) ~~Pursuant to 401 KAR 60:005, incorporating by reference 40 CFR 60, Subpart GG, and~~ To preclude the applicability of 401 KAR 51:017, ~~source-wide potential~~ emissions of CO ~~from the combustion turbines, electric generator, fire water pump, and natural gas heater (source-wide), Emission Units 01 through 06,~~ shall not exceed ~~245-249~~ tons ~~per year,~~ during any consecutive twelve (12) month period. The ~~potential-source-wide~~ emissions of NO_x ~~from the combustion turbines, electric generator, fire water pump, and natural gas heater (source-wide), Emission Units 01 through 06,~~ shall not exceed ~~95-99~~ tons ~~per year,~~ during any consecutive twelve (12) month period. The permittee shall assure compliance with these limitations ~~by use of CEM systems for the combustion turbines and by performing calculations for the natural gas heater using emission factors provided in the permit application based on 3.b.-d. below.~~
 - b)
 1. NO_x and CO Emissions from the combustion turbines, Emission Unit 01 thru 03, shall be determined with CEMs.
 2. NO_x and CO Emissions from Emission Unit 04, natural gas heater, may be calculated with the following equations: NO_x emissions = (emission factor from manufacturer = 0.12 lb/MMBtu)*(heat input = 5 MMBtu/hr)*(hours operated per month)*(1 ton/2000lbs); CO emissions = (emission factor from manufacturer = 0.05 lb/MMBtu)*(heat input = 5 MMBtu/hr)*(hours operated per month)*(1 ton/2000lbs).
 3. NO_x and CO Emissions from ~~the~~ Emission Unit 05, 382 HP Diesel Emergency Generator, may be calculated with the following equations: NO_x emissions = (emission factor from 2016 application = 617.40 lb/1000 Gallons)*(Hourly Design Capacity = 0.0179 1000 Gallons/hr)*(hours operated per month)*(1 ton/2000lbs); CO emissions = (emission factor from 2016 application = 133 lb/1000 Gallons)*(Hourly Design Capacity = 0.0179 1000 Gallons/hr)*(hours operated per month)*(1 ton/2000lbs)
 4. NO_x and CO Emissions from ~~the~~ Emission Unit 06, 208 HP Diesel Emergency Fire pump, may be calculated with the following equations: NO_x emissions = (emission factor from 2016 application = 617.40 lb/1000 Gallons)*(Hourly Design Capacity = 0.01 1000 Gallons/hr)*(hours operated per month)*(1 ton/2000lbs); CO emissions = (emission factor from 2016 application = 133 lb/1000 Gallons)*(Hourly Design Capacity = 0.01 1000 Gallons/hr)*(hours operated per month)*(1 ton/2000lbs)

SECTION D - SOURCE EMISSION LIMITATIONS AND TESTING REQUIREMENTS (CONTINUED)

- c) The permittee shall calculate and record the tons of NO_x and CO emissions emitted from the source on a monthly basis. Additionally, the permittee shall ~~also~~ calculate and record the tons of NO_x and CO emissions emitted from the source during any consecutive twelve (12) months.
- d) Compliance with the ~~annual~~-NO_x and CO emission limitations shall be determined by summing the emissions from the turbines, ~~electric-emergency~~ generator, fire water pump, and the natural gas heater for any consecutive twelve (12) months ~~total period~~.
- e) Records of tons of NO_x and CO emissions emitted from ~~the source~~ Emission Units 01-06 in any consecutive twelve (12) month period shall be reported quarterly to the Division's Frankfort Regional Office.