

From: [Alex Johnson](#)
To: [Kyle Dunn](#)
Cc: [DEQ AQD APU](#)
Subject: Re: 2026-0090-C Public Version
Date: Tuesday, April 14, 2026 12:43:52 PM
Attachments: [image001.png](#)
[Outlook-houacvgh.png](#)

Kyle:

Received, thank you.

It is noted that this file contains the number of engines at the facility, which was previously requested to be CBI.

APU: This file goes under the following as a public copy.

Permit No: 2026-0090-C

Company: Acacia House Group

Facility: Acacia Facility

ID: 25444

Sincerely,

Alex Johnson, E.I. VI
Oklahoma Department of Environmental Quality
Air Quality Division, New Source Permits Section
707 N Robinson, P.O. Box 1677
Oklahoma City, OK 73101-1677
Email: Alex.Johnson@deq.ok.gov
Phone: (405) 702-4201



From: Kyle Dunn <kdunn@trinityconsultants.com>
Sent: Tuesday, April 14, 2026 12:23 PM
To: DEQ AQD APU <AQD_APU@deq.ok.gov>
Cc: Alex Johnson <Alex.Johnson@deq.ok.gov>
Subject: [EXTERNAL] RE: 2026-0090-C Public Version

Per DEQ's request, we are submitting the attached revised Public Version of the application for Draft Permit 2026-0090-C for the proposed Acacia Facility.

Thanks,

Kyle Dunn, PE
Managing Consultant

P 918.442.1181
5801 East 41st Street, Suite 450, Tulsa, OK 74135
Email: kdunn@trinityconsultants.com

From: Alex Johnson <Alex.Johnson@deq.ok.gov>
Sent: Thursday, February 26, 2026 4:09 PM
To: Kyle Dunn <kdunn@trinityconsultants.com>
Cc: mmontfort@wsgr.com; DEQ AQD APU <AQD_APU@deq.ok.gov>
Subject: 2026-0090-C ACL Issued

Good Afternoon:

Attached is the issued administrative completeness letter for the Acacia Facility. This permit is now in the status of Technical Review.

The attached document is an official communication from DEQ. You will not receive a hard copy. If you have any questions about this permit action, please contact Alex Johnson using the information in the signature below.

Permit No.: 2026-0090-C
Company: Acacia House Group LLC
Facility: Acacia Facility
Facility ID: 25240

Sincerely,

Alex Johnson, E.I. VI
Oklahoma Department of Environmental Quality
Air Quality Division, New Source Permits Section
707 N Robinson, P.O. Box 1677
Oklahoma City, OK 73101-1677
Email: Alex.Johnson@deq.ok.gov
Phone: (405) 702-4201





5801 E 41st St, Ste 450, Tulsa, OK 74135 / P 918.622.7111 / F 918.512.7084 / trinityconsultants.com

January 30, 2026

Air Permit Section Chief
Air Quality Division - Permits & Engineering Group
Oklahoma Department of Environmental Quality
707 North Robinson
Oklahoma City, OK 73101

Re: **PUBLIC** Application for Part 70 Construction Permit
Acacia Facility
Acacia House Group LLC

To Whom It May Concern,

Trinity Consultants (Trinity) is submitting this Part 70 construction permit application on behalf of Acacia House Group LLC for a new facility to be known as the Acacia Facility. The specifics of the project are considered confidential business information; therefore, two versions of the application have been provided. This is the public version of the application.

In accordance with OAC 252:100-7, the \$7,500 fee was paid via credit card. If you have any questions or need additional information, please contact me at 918-622-7111 or kdunn@trinityconsultants.com.

Sincerely,
TRINITY CONSULTANTS

Kyle Dunn, PE
Managing Consultant

Encl: Public Version - DEQ Permit Application Forms

HEADQUARTERS

12700 Park Central Dr, Ste 2100, Dallas, TX 75251 / P 800.229.6655 / P 972.661.8100 / F 972.385.9203

PART 70 CONSTRUCTION PERMIT APPLICATION

PUBLIC VERSION

**Acacia House Group LLC
Acacia Facility**

Prepared By:

TRINITY CONSULTANTS

5801 E. 41st St.
Tulsa, OK 74135
(918) 622-7111

January 2026



1. PROJECT DESCRIPTION

Acacia House Group LLC (Acacia) is proposing to build a new data center (the facility) southwest of Muskogee, OK.

Acacia is proposing to install the following equipment at the site (the count and type of engine are deemed confidential information):

- One hundred seventy-six (176) diesel-fired emergency generators (EU IDs G1 – G176)
- Two (2) diesel-fired fire pump engines (EU IDs FP-1 – FP-2)
- Five (5) diesel-fired backup generators (EU IDs GEN-1 – GEN-5)
- One hundred eighty-three (183) diesel belly tanks (Insignificant Activity)

Acacia is also requesting approval to utilize hydrotreated vegetable oil (HVO) as an alternative fuel for the engines.

This application is classified as Tier II based on the request for a new Part 70 construction permit for a major source facility. A more detailed discussion of this classification is included in the regulatory applicability section.

2. PROCESS DESCRIPTION

Acacia operates a data center that includes emergency generators as permitted emission sources. The facility also has fuel storage tanks that are considered insignificant activities. The emergency generators provide power to the data center in the event of a power supply interruption. The facility also has diesel-fired emergency fire pump engines for use in the event of a fire at the facility, and backup emergency generators for the wastewater treatment plant, HUB, site entrance and warehouse.

3. PROJECT EMISSIONS

Acacia is proposing to install the following equipment at the site:

- One hundred seventy-six (176) diesel-fired emergency generators (EU IDs G1 – G176)
- Two (2) diesel-fired fire pump engines (EU IDs FP-1 – FP-2)
- Five (5) diesel-fired backup generators (EU IDs GEN-1 – GEN-5)
- One hundred eighty-three (183) diesel belly tanks (Insignificant Activity)

Emissions for the emergency generators are calculated using the worst-case emission factor from several sources for each pollutant at various loads as a conservative estimate. Insignificant activities are not included in the proposed emissions.

A summary of proposed emissions is included in the table below, and detailed emission calculations are attached.

Table 1. Proposed Emissions Summary

EU#	Description	NO_x tpy	CO tpy	VOC tpy	SO₂ tpy	PM_{10/2.5} tpy	HAPs tpy
G1 – G176	2750 kW Standby Generators	238.72	58.64	7.52	0.14	6.00	0.08
FP-1 – FP-2	Fire Pump Engines	1.71	0.37	0.14	6.01E-04	0.12	1.48E-03
GEN-1	WWTP Backup Generator	1.95	0.28	0.05	1.40E-03	0.02	4.93E-04
GEN-2 – GEN-3	HUB Backup Generators	3.90	0.55	0.09	2.81E-03	0.04	9.87E-04
GEN-4 – GEN-5	Site Entrance & Warehouse Generators	2.45	0.53	0.19	8.57E-04	0.17	2.11E-03
Proposed Site-wide Emissions		248.73	60.37	7.99	0.14	6.39	0.09
Proposed Permit Limits		249	100	100	100	100	25

4. OKLAHOMA DEQ ADMINISTRATIVE FORMS

AIR QUALITY PERMIT APPLICATION GENERAL FACILITY INFORMATION										APPLICATION NUMBER (AQD Use Only)		
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1	COMPANY INFORMATION	Name	Acacia House Group LLC							
Mailing Address		2801 Centerville Road, 1st Floor PMB 160			City	Wilmington	State	DE	Zip	19808

2	APPLICATION TYPE	Applicability Determination	☒	Construction Permit	☐	Operating Permit
	GP Authorization To Operate	GP Authorization To Construct		GP Name:		
	Renewal	Modification		Relocation	PBR	PBR Type:
Permit Number(s) (If Applicable)						
Est. Date of Construction/Modification Start:			6/2026	Operational Start-up:		
Construction Permit Public Review Process:			X	Traditional		Enhanced

3	IS CONFIDENTIAL INFORMATION INCLUDED?	☒	YES	☐	NO
By including confidential information, Applicant acknowledges that such information may be shared with the U.S. Environmental Protection Agency for purposes consistent with the Federal Clean Air Act, 42 U.S.C. §§ 4201 et. seq.					

4	TIER CLASSIFICATION	Tier I	☒	Tier II	☐	Tier III	☐	N/A – AD only
FACILITY TYPE		X	Major		Minor	Synthetic Minor		

5	FEES SUBMITTED	\$ 7,500.00	CHECK #		DATE	
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6	TECHNICAL CONTACT	Name	Kyle Dunn						
Phone		918-442-1181	Email Address		kdunn@trinityconsultants.com				
Company Name		Trinity Consultants, Inc.							
Street Address		5801 East 41st Street, Suite 450		City	Tulsa	State	OK	Zip	74135

7	FACILITY INFORMATION	Name	Acacia Facility							
SIC Code(s)		7374			NAICS Code(s)		518210			
Contact Person		Michael Montfort		Title	Manager	Phone	202-904-0808			
LEGAL DESCRIPTION		Sub Section	--		Section	19	Township	13N	Range	16E
Physical Address or Driving Directions		From the intersection of OK-72 N/S and W 143rd St near Council Hill, head north on OK-72 for 2.1 miles then turn right (east) on W 123rd St for 0.8 miles to the facility entrance on the left.								
City or Nearest Town		Council Hill		Zip	74450		County	Muskogee		

8	GEOGRAPHIC COORDINATES	Latitude (to 5 Decimals)	35.58091	Longitude (to 5 Decimals)	-95.64531
REFERENCE POINT		X	Facility Entrance Point or First Gate of Lease Property (preferred above all other options)		
Center of Facility			Other (Specify):		

9	APPLICATION CERTIFICATION	This application, including all attachments, has been submitted as required by OAC 252:100.							
I certify that (a) I am the Responsible Official for this company as defined in OAC 252:100-3; and (b) based on information and belief formed after reasonable inquiry, the statements and information contained in this application are true, accurate, and complete.									
Responsible Official (name)		Michael Montfort			Title	Manager			
Responsible Official (signature)					Date				
Phone	202-904-0808		Email Address		mmontfort@wsgr.com				
Street Address		2801 Centerville Road, 1st Floor PMB 160		City	Wilmington	State	DE	Zip	19808

DEQ LANDOWNER NOTIFICATION AFFIDAVIT

Tier I, II, or III permit applicants must provide notice to the landowner(s). The basis for this requirement is Title 27A of the Oklahoma Statutes, Supplement 1996, § 2-14-103(9), as described in OAC 252:4-7-13 (b).

Please note that you MUST fill out and return this affidavit even if you don't have to give any landowner notice.

A	NOTICE TO THE LANDOWNER(S) IS NOT REQUIRED because: (check one)
	My application does not involve any land.
X	My application involves only land owned by me (or applicant business).
	I have a current lease given to accomplish the permitted purpose.
	I have a current easement given to accomplish the permitted purpose.

OR

B	NOTICE TO THE LANDOWNER(S) IS REQUIRED because the land is owned by someone other than myself or the applicant business AND I HAVE NOTIFIED the following (check one):		
	Landowner(s)	☐	Lessor or Administrator or Executor of the land
METHOD OF DELIVERY (check one):			
	Actual notice, for which I have a signed and dated receipt		
	Service by Sheriff or private process server, for which I have an affidavit		
	Service by certified mail, restricted delivery, for which I have a signed return receipt		
	Legal publication, for which I have an affidavit of publication from the newspaper, because the landowners could not be located through due diligence		

LANDOWNER AFFIDAVIT CERTIFICATION			
I, as the applicant or an authorized representative of the applicant, hereby certify that I own the real property, have a current lease or easement which is given to accomplish the permitted purpose (per Option A above), or have provided legal notice to the landowner(s) (per Option B above) about the permit application for the facility described below.			
Company Name	Acacia House Group LLC	Facility Name	Acacia Facility
Facility Address or Legal Description.	Section 19, Township 13N, Range 16E, Muskogee County		
Responsible Official (signature)		Date Signed	
Responsible Official (typed)	Michael Montfort	Title	Manager

If the landowner notice applies to your application (Option B above) you can send the following form to them as your notice:

NOTICE TO LANDOWNER OF FILING

Dear Landowner: (Name) _____

(Applicant name) _____ has filed a permit application with the Oklahoma Department of Environmental Quality for (Facility Name) _____ facility.

This application involves the land owned by you located at:

Address or Legal Description: _____

Signed: _____ Date: _____

AIR QUALITY DIVISION CLASSIFICATION OF AQ PERMIT APPLICATIONS & APPLICATION FEES		Application Number (AQD Use Only)	

Company Name	Acacia House Group LLC						
Facility Name	Acacia Facility						
Mailing Address	2801 Centerville Road, 1st Floor PMB 160	City	Wilmington	State	DE	Zip	19808

This form is used to document both a preliminary determination of the Tier classification and any associated Application Fee.

Step 1: APPLICATION CLASSIFICATION AND TIER DETERMINATION

DEQ's "Uniform Permitting" system, under OAC 252:004, categorizes different types of applications as Tier I, II, or III, depending on their complexity and the amount of public interest. The main effect of a Tier classification is the amount of public review given the application. For Air Quality permits, Tier I basically includes minor facilities and most synthetic minor facilities. Tier II covers major sources, and Tier III covers only very large sources such as those requiring PSD review. Additional information to make a preliminary determination of the Tier classification is provided on the next page. This determination will be verified before permit issuance.

Note that all Tier II and III applications require public notice of the application in one newspaper local to the site or facility as soon after the filing date as possible. Other public participation requirements, such as notice of draft and proposed permit, and notice of public meeting may also be required. Contact our office for more information on these requirements.

TIER CLASSIFICATION		Tier I	X	Tier II		Tier III		N/A – AD only
FACILITY TYPE	X	Major		Minor		Synthetic Minor	Confirmed/Corrected by: (AQD Use Only)	

Step 2: APPLICATION TYPE & FEE

Application fee may be determined according to the following schedule. The emissions level is based on the single criteria pollutant with the highest emissions rate. Fees are subject to change – please refer to OAC 252:100-7-3 or 252:100-8-1.7 for the latest fee schedule.

MAJOR SOURCE		Fee	MINOR OR SYNTHETIC MINOR SOURCE		Fee
☐	Applicability Determination (100734)	\$500	☐	Applicability Determination (100922)	\$500
☐	GP- Authorization to Construct (100778)	\$900	☐	PBR – Construct (100985)	\$250
☐	GP- Authorization to Operate (100788)	\$900	☐	PBR – Operate (100989)	\$100
X	Part 70 Construction (100150)	\$7,500	☐	GP – Authorization to Construct (100826)	\$500
☐	Part 70 Construction Modification (100779)	\$5,000	☐	GP – Authorization to Operate (100827)	\$500
☐	Part 70 Operation (100733)	\$7,500	☐	Construction (100829)	\$2,000
☐	Part 70 Minor Modification (100781)	\$3,000	☐	Permit Amendment – no emission increase (100830)	\$500
☐	Part 70 Significant Modification (100786)	\$6,000	☐	Operating Permit (100831)	\$750
☐	Part 70 Renewal (100787)	\$7,500	☐	Operating Permit Modification (100833)	\$750
☐	Part 70 Relocation (100782)	\$500	☐	Relocation (100834)	\$250
Application Type Confirmed – (AQD Use Only)					

GP or PBR Name (If Applicable):		Existing Permit Number (If Applicable):	
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PAYMENT INFORMATION

Please choose one payment type, and attach payment – payable to the Department of Environmental Quality (no cash can be accepted). Please reference the facility name (or existing permit or Authorization number) on the check or money order.

Payment Type	X	Check		Money Order	Amount/Receipt Confirmed by: (DEQ Use Only)	
Amount:	\$	7,500.00	Check or money Order Number:		Date:	

PART 1a

DEQ

Emissions Inventory

1	COMPANY NAME	Acacia House Group LLC
	FACILITY NAME	Acacia Facility
	COUNTY	Muskogee

2 ANNUAL EMISSIONS INVENTORY

The following annual emissions inventory represents the emissions from the facility and should be used in the AQD evaluation and preparation of the permit. **Check only one in Box 2 or see Box 3.**

- ☐ Use the annual emissions inventory as it appears in the most recent "Turn Around Document" dated ____ which is on file with AQD. The inventory is accurate, complete, and uses the same numbering and naming conventions as presented in this Title V Permit Application and includes supporting information to document emissions calculations pursuant to OAC 252:100-7-4(d)(2).
- ☐ Use the annual emissions inventory as it appears in the attached new or revised "Turn Around Document" dated _____. This inventory is accurate, complete, and uses the same numbering and naming conventions as presented in the Major Source Operating Permit Application Guide and includes supporting information to document emissions calculations pursuant to OAC 252:100-7-4(d)(2). This information is included in Appendix ____.

3 ALTERNATIVE METHODS TO INVENTORY EMISSIONS

The following alternate method represents the emission from the facility and should be used in the AQD evaluation and preparation of the permit. **Check as appropriate.**

- ☐ Referenced emissions listed in a current permit, permit number(s):

which have been summarized in Appendix ____ using the same numbering and naming conventions as presented in the Major Source Operating Permit Application Guide.
- ☐ A worksheet developed by the Agency for specific industries included in Appendix ____ using the same numbering and naming conventions as presented in the Major Source Operating Permit Application Guide.
- ☒ Other method(s) to be approved by DEQ with all associated justifications, documentation, and calculations pursuant to OAC 252:100-8-5(d)(3) located in Appendix A using the same numbering and naming conventions as presented in the Major Source Operating Permit Application Guide.

PART 1b

Insignificant Activities

DEQ

Check the box if the insignificant activity, unless otherwise regulated by applicable state or federal regulations, is performed at the facility.

COMPANY NAME	Acacia House Group LLC
FACILITY NAME	Acacia Facility
COMBUSTION EQUIPMENT	
☐	* Stationary reciprocating engines burning natural gas, gasoline, aircraft fuels, or diesel fuel which are either used exclusively for emergency power generation or for peaking power service not exceeding 500 hours/year.
☐	Space heaters, boilers, process heaters, and emergency flares less than or equal to 5 MMBTU/hr heat input (commercial natural gas).
☐	Emissions from stationary internal combustion engines rated less than 50 hp output.
☐	Emissions from gas turbines with less than 215 kilowatt rating of electric output.
STORAGE TANKS/DISTRIBUTION	
☐	* Emissions from fuel storage/dispensing equipment operated solely for facility owned vehicles if fuel throughput is not more than 2,175 gallons/day, averaged over a 30-day period.
☒	* Storage tanks with less than or equal to 10,000 gallons capacity that store volatile organic liquids with a true vapor pressure less than or equal to 1.0 psia at maximum storage temperature.
☐	* Bulk gasoline or other fuel distribution with a daily average throughput less than 2,175 gallons per day, including dispensing, averaged over a 30-day period
☐	Gasoline and aircraft fuel handling facilities, equipment, and storage tanks except those subject to New Source Performance Standards and standards in OAC 252:100-37-15, 252:100-39-30, 252:100-39-41, and 252:100-39-48.
☐	Emissions from condensate tanks with a design capacity of 400 gallons or less in ozone attainment areas.
☐	Emissions from crude oil and condensate marine and truck loading equipment operations at crude oil and natural gas production sites where the loading rate does not exceed 10,000 gallons per day averaged over a 30-day period.
☐	* Emissions from crude oil and condensate storage tanks with a capacity of less than or equal to 420,000 gallons that store crude oil and condensate prior to custody transfer.
☐	* Emissions from storage tanks constructed with a capacity less than 39,894 gallons which store VOC with a vapor pressure less than 1.5 psia at maximum storage temperature
ANALYSIS/LABORATORY ACTIVITIES	
☐	Additions or upgrades of instrumentation or control systems that result in emissions increases less than the pollutant quantities specified in OAC 252:100-8-3(e)(1).
EQUIPMENT	
☐	Alkaline/phosphate washers and associated burners.
☐	Cold degreasing operations utilizing solvents that are denser than air.
☐	* Welding and soldering operations utilizing less than 100 pounds of solder and 53 tons per year of electrodes
☐	Wood chipping operations not associated with the primary process operation
☐	* Torch cutting and welding of under 200,000 tons of steel fabricated per year
REMEDIATION	
☐	Site restoration and/or bioremediation activities of < 5 years expected duration.
☐	Hydrocarbon contaminated soil aeration pads utilized for soils excavated at the facility only.
☐	Emissions from the operation of groundwater remediation wells including but not limited to emissions from venting, pumping, and collecting activities subject to de minimis limits for air toxics (OAC 252:100-41-43) and HAPs (§112(b) of CAAA90).
SOLID WASTE	
☐	* Non-commercial water washing operations (less than 2,250 barrels/year) and drum crushing operations of empty barrels less than or equal to 55 gallons with less than three percent by volume of residual material.
☐	Hazardous waste and hazardous materials drum staging areas.
☐	Sanitary sewage collection and treatment facilities other than incinerators and Publicly Owned Treatment Works (POTW). Stacks or vents for sanitary sewer plumbing traps are also included (i.e., lift station).
☐	Emissions from landfills and land farms unless otherwise regulated by an applicable state or federal regulation.
COATINGS	
☐	* Automobile body shops located in an ozone attainment area emitting less than 5 tons/year of volatile organic solvents.
☐	Electrophoretic-process coating application operations (i.e., paint bath positively charged, painted object negatively charged).
☐	* Surface coating operations which do not exceed a combined total usage of more than 60 gallons/month of coatings, thinners, and clean-up solvents at any one emissions unit.
MISCELLANEOUS	
☐	Exhaust systems for chemical, paint, and/or solvent storage rooms or cabinets, including hazardous waste satellite (accumulation) areas.
☒	Hand wiping and spraying of solvents from containers with less than 1 liter capacity used for spot cleaning and/or degreasing in ozone
☒	* Activities having the potential to emit no more than 5 TPY (actual) of any criteria pollutant (see instructions).

* Appropriate records of hours, quantity, or capacity must be kept on the activity to verify its insignificance.

PART 1c

DEQ

Shield Request (Optional)

1	COMPANY NAME	Acacia House Group LLC
	FACILITY NAME	Acacia Facility

2	REQUEST OPTIONS
Based on the information included in this application, it is requested that the following determinations be conducted during the review of this application and issuance of the air operation permit under OAC 252:100-8.	
☒	Permit Shield as provided by OAC 252:100-8-6(f)(1)
☒	Non Applicable Requirements as provided by OAC 252:100-8-6(f)(2)
☒	Requirements which are not federally enforceable will be specifically designated in the permit as non-federally enforceable, state-only requirements
☐	Application Shield as alluded to in OAC 252:100-8-7(b)(2)
☐	Condition changes identified on PART 5c(s) be reviewed and accepted
☒	Insignificant Activities identified in PART 1b be reviewed and accepted
☐	Other requests:

TIER DETERMINATION INFORMATION

OAC 252:004-7 categorizes different types of Air Quality applications as Tier I, II, or III, depending on their complexity and the amount of public interest under DEQ's "Uniform Permitting" system. The Tier classification affects the amount of public review given the application. Applicants may use the following format as a checklist for determining Tier classification.

OAC 252:4-7-32. Air quality applications - Tier I

No Public Notice Requirement

- ☐ (1) Relocation permit for a minor facility.
- ☐ (2) Modification of an existing FESOP that is based on the operating conditions of a construction permit that was processed under Tier I and completed the web-based public notice requirement and does not differ from those construction permit conditions in any way considered significant. [FESOP Enhanced NSR]
- ☐ (3) Extension of expiration date of a minor facility construction permit.
- ☐ (4) Modification of any Part 70 source operating permit condition that is based on the operating conditions of a construction permit that was processed under Tier I (with web-based public notice), Tier II, or Tier III and OAC 252:100-8-8 and does not differ from those construction permit conditions in any way considered significant under OAC 252:100-8-7.2(b)(2). [Enhanced NSR]
- ☐ (5) Extension of expiration date of a Part 70 source's construction permit.
- ☐ (6) New, modified, and renewed individual authorizations under general permits for which a schedule of compliance is not required by OAC 252:100-8-5(e)(8)(B)(i).
- ☐ (7) Burn approvals.
- ☐ (8) Administrative amendments of all air quality permits and other authorizations

No Public Notice Requirement, 45-Day EPA Review Requirement

- ☐ (1) Minor modification to a Part 70 source operating permit where the facility obtained a prior construction permit for the modification as required by OAC 252:100-8-4(a)(1)(B)(iv). [Traditional NSR]
- ☐ (2) Minor modification under OAC 252:100-8-7.2(b)(1) to a Part 70 source operating permit that did not trigger an NSR permitting action

Web-based Public Notice Requirement

- ☐ (1) New minor NSR construction permit for a minor facility.
- ☐ (2) Initial operating permit for a new minor facility.
- ☐ (3) Modification of a construction permit for a minor facility.
- ☐ (4) Modification of an existing minor operating permit that was issued prior to September 15, 2021, and that will now become a FESOP
- ☐ (5) Modification of a minor operating permit that did not undergo the *FESOP Enhanced NSR Process*. [Traditional NSR]
- ☐ (6) Construction permit for an existing Part 70 source for any facility change considered to be a minor modification under OAC 252:100-8-7.2(b)(1).

OAC 252:4-7-33. Air quality applications - Tier II

- ☐ (1) A minor facility seeking a permit for a facility modification that when completed would turn it into a Part 70 source
- ☐ (2) Any permit application for a Part 70 source that would result, on issuance, with the facility being covered by a FESOP (PBR, GP, or individual facility operating permit).
- ☒ (3) Construction permit for a new Part 70 source not classified under Tier III.
- ☐ (4) Construction permit for an existing Part 70 source for any facility change considered significant under OAC 252:100-8-7.2(b)(2) and which is not classified under Tier III.
- ☐ (5) Initial operating permit for a Part 70 source.
- ☐ (6) Acid rain permit that is independent of a Part 70 permit application.
- ☐ (7) Temporary source permit under OAC 252:100-8-6.2.
- ☐ (8) Significant modification, as described in OAC 252:100-8-7.2(b)(2), of a Part 70 operating permit that did not undergo the *Enhanced NSR Process*. [Traditional NSR]
- ☐ (9) Modification of a Part 70 operating permit when the conditions proposed for modification differ from the underlying construction permit's operating conditions in any way considered significant under OAC 252:100-8-7.2(b)(2). [Traditional NSR]
- ☐ (10) A Part 70 construction permit modification considered significant under OAC 252:100-8-7.2(b)(2) and which is not classified under Tier III.
- ☐ (11) Renewals of operating permits for Part 70 sources.
- ☐ (12) New, modified, and renewed general permits
- ☐ (13) Individual authorizations under any general permit for which a schedule of compliance is required by OAC 252:100-8-5(e)(8)(B)(i).
- ☐ (14) Plant-wide emission plan approval under OAC 252:100-37-25(b) or OAC 252:100-39-46(j).

OAC 252:4-7-34. Air quality applications - Tier III

- (a) A construction permit for any new major stationary source listed in this subsection requires a Tier III application. For purposes of this section, "Major stationary source" means:

- ☐ (1) Any of the following sources of air pollutants which emits, or has the PTE, 100 TPY or more of any pollutant subject to regulation:
 - ☐ (A) carbon black plants (furnace process),
 - ☐ (B) charcoal production plants,
 - ☐ (C) chemical process plants,
 - ☐ (D) coal cleaning plants (with thermal dryers),
 - ☐ (E) coke oven batteries,
 - ☐ (F) fossil-fuel boilers (or combustion thereof), totaling more than 250 million BTU per hour heat input,
 - ☐ (G) fossil fuel-fired steam electric plants of more than 250 million BTU per hour heat input,
 - ☐ (H) fuel conversion plants,
 - ☐ (I) glass fiber processing plants,
 - ☐ (J) hydrofluoric, sulfuric or nitric acid plants,
 - ☐ (K) iron and steel mill plants,
 - ☐ (L) kraft pulp mills,
 - ☐ (M) lime plants,
 - ☐ (N) incinerators, except where used exclusively as air pollution control devices,
 - ☐ (O) petroleum refineries,
 - ☐ (P) petroleum storage and transfer units with a total storage capacity exceeding 300,000 barrels,
 - ☐ (Q) phosphate rock processing plant,
 - ☐ (R) portland cement plants,
 - ☐ (S) primary aluminum ore reduction plants,
 - ☐ (T) primary copper smelters,
 - ☐ (U) primary lead smelters,
 - ☐ (V) primary zinc smelters,
 - ☐ (W) secondary metal production plants,
 - ☐ (X) sintering plants,
 - ☐ (Y) sulfur recovery plants, or
 - ☐ (Z) taconite ore processing plants, and

- ☐ (2) Any other source not specified in paragraph (1) of this definition which emits, or has the PTE, 250 TPY or more of any pollutant subject to regulation.

- (b) Existing incinerators. An application for any change in emissions or potential to emit, or any change in any permit condition, that would have caused an incinerator to be defined as a major stationary source when originally permitted shall require a Tier III application

PART 3

DEQ

Emissions Unit Group (EUG) Description

1	COMPANY NAME	Acacia House Group LLC
	FACILITY NAME	Acacia Facility

2	EUG	Facility	3	SCENARIO	Normal
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[illegible]

5	Include a Process Flow or Block Diagram as Appendix <u>N/A - Included</u> and A Narrative Description of the Facility as Appendix <u>N/A - Included</u>
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PART 5

DEQ

Emissions Unit Group Compliance Demonstration

1	COMPANY NAME	Acacia House Group LLC
	FACILITY NAME	Acacia Facility

2	EU #(s)	Facility-Wide	EUG #	Facility	SCENARIO	Normal
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		DESCRIPTION	APPENDIX
3	Citation/Method	OAC 252:100-1; 100-2; 100-3; 100-5; 100-8;100-9; 100-13;100-19; 100-25; 100-29; 100-31; 100-37; 100-39; 100-42; 100-43 40 CFR 51; 82	N/A
4	Initial Compliance Limits, Demonstration, and Status	No specific requirements necessary other than the standard requirements in these subchapters or as mentioned for specific EUG.	N/A
	Proposed Compliance Assurance Certification and Reporting	Comply with all requirements set forth in air permit	N/A
6	Other Requirements	N/A	N/A
3	Citation/Method	OAC 252:100-8	N/A
4	Initial Compliance Limits, Demonstration, and Status	Facility-Wide Emission Limit of 249 tpy NOX	N/A
5	Proposed Compliance Assurance Certification and Reporting	NOX emissions from the facility shall be based on manufacturer emission factors where available, applicable EPA Tier standards, current AP-42 factors, and hours of operation. Compliance with the emission limits for NOX from the facility shall be determined monthly, and be based on a 12-month rolling total.	N/A
6	Other Requirements	N/A	N/A
3	Citation/Method	OAC 252:100-43	N/A
4	Initial Compliance Limits, Demonstration, and Status	The fuel-burning equipment shall be fired with ultra-low sulfur diesel or hydrotreated vegetable oil (HVO).	N/A
5	Proposed Compliance Assurance Certification and Reporting	Compliance can be shown by the following methods: a current fuel company bill, a fuel contract, tariff sheet, etc. Compliance can also be demonstrated by the supplier's latest delivery ticket(s) or SDSs and shall be demonstrated at least once every calendar year.	N/A
6	Other Requirements	N/A	N/A

PART 3

DEQ

Emissions Unit Group (EUG) Description

1	COMPANY NAME	Acacia House Group LLC
	FACILITY NAME	Acacia Facility

2	EUG	1 - Emergency Generator Engines	3	SCENARIO	Normal
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[illegible]

5	Include a Process Flow or Block Diagram as Appendix <u>N/A - Included</u> and A Narrative Description of the Facility as Appendix <u>N/A - Included</u>
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PART 5

DEQ

Emissions Unit Group Compliance Demonstration

1	COMPANY NAME	Acacia House Group LLC
	FACILITY NAME	Acacia Facility

2	EU #(s)	G1 – G176	EUG #	1	SCENARIO	Normal
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		DESCRIPTION	APPENDIX
3	Citation/Method	40 CFR Part 63, Subpart ZZZZ	N/A
4	Initial Compliance Limits, Demonstration, and Status	The generators will comply with NESHAP ZZZZ by complying with NSPS IIII.	N/A
	Proposed Compliance Assurance Certification and Reporting	There are no applicable requirements.	N/A
6	Other Requirements	N/A	N/A
3	Citation/Method	40 CFR Part 60, Subpart IIII	N/A
4	Initial Compliance Limits, Demonstration, and Status	The generators will be subject to NSPS IIII. The engines will comply with applicable requirements.	N/A
5	Proposed Compliance Assurance Certification and Reporting	Submittal of applicable notifications and reports required under NSPS IIII to ODEQ.	N/A
6	Other Requirements	N/A	N/A
3	Citation/Method	OAC 252:100-8	N/A
4	Initial Compliance Limits, Demonstration, and Status	Emissions calculation methodology for demonstrating compliance with the facility-wide emissions limit	N/A
5	Proposed Compliance Assurance Certification and Reporting	If using manufacturer's emission factors at various loads (proposed emission factors that were provided in the confidential application), then each engine's load shall be continuously monitored by the site's generator computer system. Calculations shall use emission factors for the highest load reached in any given operating hour.	N/A
6	Other Requirements	N/A	N/A

PART 3

DEQ

Emissions Unit Group (EUG) Description

1	COMPANY NAME	Acacia House Group LLC
	FACILITY NAME	Acacia Facility

2	EUG	2 - Fire Pump Engines	3	SCENARIO	Normal
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[illegible]

5	Include a Process Flow or Block Diagram as Appendix <u>N/A - Included</u> and A Narrative Description of the Facility as Appendix <u>N/A - Included</u>
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PART 5

DEQ

Emissions Unit Group Compliance Demonstration

1	COMPANY NAME	Acacia House Group LLC
	FACILITY NAME	Acacia Facility

2	EU #(s)	FP-1 - FP-2	EUG #	2	SCENARIO	Normal
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		DESCRIPTION	APPENDIX
3	Citation/Method	40 CFR Part 63, Subpart ZZZZ	N/A
4	Initial Compliance Limits, Demonstration, and Status	The fire pumps will comply with NESHAP ZZZZ by complying with NSPS IIII.	N/A
	Proposed Compliance Assurance Certification and Reporting	There are no applicable requirements.	N/A
6	Other Requirements	N/A	N/A
3	Citation/Method	40 CFR Part 60, Subpart IIII	N/A
4	Initial Compliance Limits, Demonstration, and Status	The fire pumps will be subject to NSPS IIII. The engines will comply with applicable requirements.	N/A
5	Proposed Compliance Assurance Certification and Reporting	Submittal of applicable notifications and reports required under NSPS IIII to ODEQ.	N/A
6	Other Requirements	N/A	N/A
3	Citation/Method		
4	Initial Compliance Limits, Demonstration, and Status		
5	Proposed Compliance Assurance Certification and Reporting		
6	Other Requirements		

PART 3

DEQ

Emissions Unit Group (EUG) Description

1	COMPANY NAME	Acacia House Group LLC
	FACILITY NAME	Acacia Facility

2	EUG	3 - Backup Generators	3	SCENARIO	Normal
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[illegible]

5	Include a Process Flow or Block Diagram as Appendix <u>N/A - Included</u> and A Narrative Description of the Facility as Appendix <u>N/A - Included</u>
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PART 5

DEQ

Emissions Unit Group Compliance Demonstration

1	COMPANY NAME	Acacia House Group LLC
	FACILITY NAME	Acacia Facility

2	EU #(s)	GEN-1 - GEN-5	EUG #	3	SCENARIO	Normal
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		DESCRIPTION	APPENDIX
3	Citation/Method	40 CFR Part 63, Subpart ZZZZ	N/A
4	Initial Compliance Limits, Demonstration, and Status	The generators will comply with NESHAP ZZZZ by complying with NSPS IIII.	N/A
	Proposed Compliance Assurance Certification and Reporting	There are no applicable requirements.	N/A
6	Other Requirements	N/A	N/A
3	Citation/Method	40 CFR Part 60, Subpart IIII	N/A
4	Initial Compliance Limits, Demonstration, and Status	The generators will be subject to NSPS IIII. The engines will comply with applicable requirements.	N/A
5	Proposed Compliance Assurance Certification and Reporting	Submittal of applicable notifications and reports required under NSPS IIII to ODEQ.	N/A
6	Other Requirements	N/A	N/A
3	Citation/Method		
4	Initial Compliance Limits, Demonstration, and Status		
5	Proposed Compliance Assurance Certification and Reporting		
6	Other Requirements		

PART 3

DEQ

Emissions Unit Group (EUG) Description

1	COMPANY NAME	Acacia House Group LLC
	FACILITY NAME	Acacia Facility

2	EUG	Insig. Activities	3	SCENARIO	Normal
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[illegible]

5	Include a Process Flow or Block Diagram as Appendix <u>N/A - Included</u> and A Narrative Description of the Facility as Appendix <u>N/A - Included</u>
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PART 5

DEQ

Emissions Unit Group Compliance Demonstration

1	COMPANY NAME	Acacia House Group LLC
	FACILITY NAME	Acacia Facility

2	EU #(s)	TANKS	EUG #	Insig. Activities	SCENARIO	Normal
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		DESCRIPTION	APPENDIX
3	Citation/Method	Emissions are insignificant and do not have a specific limitation.	
4	Initial Compliance Limits, Demonstration, and Status	N/A	
5	Proposed Compliance Assurance Certification and Reporting	N/A	
6	Other Requirements	N/A	
3	Citation/Method		
4	Initial Compliance Limits, Demonstration, and Status		
5	Proposed Compliance Assurance Certification and Reporting		
6	Other Requirements		
3	Citation/Method		
4	Initial Compliance Limits, Demonstration, and Status		
5	Proposed Compliance Assurance Certification and Reporting		
6	Other Requirements		

5. REGULATORY APPLICABILITY

The following sections address regulatory applicability as it applies to the facility.

5.1 Oklahoma State Air Regulations

OAC 252: 100-8 (Permits for Major Sources)

[Applicable]

This rule provides the requirements for the permitting of major source facilities. Total facility emissions are above the major source thresholds for one or more regulated pollutants; therefore, this facility is a major source, subject to the permitting requirements of this rule.

OAC 252:100-19 (Particulate Matter)

[Applicable]

This subchapter regulates emissions of PM from new and existing fuel-burning equipment, with emission limits based on maximum design heat input rating. Fuel-burning equipment is defined in OAC 252:100-19 as any internal combustion engine or gas turbine, or other combustion device used to convert the combustion of fuel into usable energy. Thus, the generators are subject to the requirements of this subchapter. OAC 252:100, Appendix C specifies a PM emission limitation for all equipment at this facility with a heat input rating of 10 MMBTUH or less to 0.6 lb/MMBTU. AP-42 (10/96), Table 3.4-1, lists diesel total PM emissions to be 0.1 lb/MMBTU, less than the than the Appendix C limit. The permit requires the use of either diesel fuel that meets the requirements of 40 CFR §1090.305 (ULSD) for nonroad diesel fuel, HVO or a blend of HVO and diesel to demonstrate compliance with Subchapter 19.

OAC 252:100-25 (Visible Emissions and Particulates)

[Applicable]

No discharge of greater than 20% opacity is allowed except for short-term occurrences which consist of not more than one six-minute period in any consecutive 60 minutes, not to exceed three such periods in any consecutive 24 hours. In no case shall the average of any six-minute period exceed 60% opacity.

OAC 252:100-31 (Sulfur Compounds)

[Applicable]

Part 2 limits the ambient air concentration of H₂S emissions from any facility to 0.2 ppmv (24-hour average) at standard conditions which is equivalent to 283 ug/m³. Fuel-burning equipment fired with ULSD diesel, HVO, or a blend of HVO and diesel will not have the potential to exceed the H₂S ambient air concentration limit.

Part 5 limits sulfur dioxide emissions from new equipment (constructed after July 1, 1972). For liquid fuels the limit is 0.8 lb/MMBTU heat input averaged over 3 hours. All engines onsite are diesel fired and subject to the ultra-low sulfur fuel requirement for CI engines of 15 ppmw. AP-42 (10/96), Table 3.4-1 lists diesel SO₂ emission to be 1.01S₁ lb/MMBTU, where S₁ is the percent sulfur in the diesel fuel. 15 ppmw sulfur is equivalent to 0.0015 weight percent sulfur, which is equivalent to 0.00152 lb/MMBTU heat input sulfur. HVO fuel contains a sulfur content of less than 5 ppmw, equivalent to 0.00051 lb/MMBTU. This is in compliance with the liquid fuel limit, and the permit will require the use of ultra-low sulfur diesel or HVO for all fuel-burning units to ensure compliance with Subchapter 31.

OAC 252:100-33 (Nitrogen Oxides)

[Not Applicable]

This subchapter limits NO_x emissions from new fuel-burning equipment with a rated heat input greater than or equal to 50 MMBtu/hr. None of the fuel-burning equipment at the site will exceed this threshold.

OAC 252:100-37 (Volatile Organic Compounds)

[Applicable]

Part 7 requires fuel-burning and refuse-burning equipment to be operated and maintained so as to minimize VOC emissions. Temperature and available air must be sufficient to provide essentially complete combustion. All fuel-burning equipment at this location is subject to this requirement.

5.2 Federal Regulations

PSD, 40 CFR Part 52

[Not Applicable]

Total facility emissions are less than the PSD major source threshold of 250 tpy for regulated pollutants, and the facility is not among the types of operations which are defined as "major sources" at an emissions level of 100 tpy.

NSPS, 40 CFR 60

[IIII Applicable]

Subpart IIII, Stationary Compression Ignition (CI) Internal Combustion Engines (ICE). This subpart promulgates emission standards for all new CI engines ordered after July 11, 2005, and manufactured after certain dates, and are not fire pumps. The engines were manufactured after the applicability date and will be subject to this subpart.

NESHAP, 40 CFR Part 63

[ZZZZ Applicable]

Subpart ZZZZ, Reciprocating Internal Combustion Engines (RICE). This subpart affects new and existing engines at major and area sources. According to 40 CFR 63.6590(c), owners and operators of new or reconstructed engines at area sources must meet the requirements of Subpart ZZZZ by complying with 40 CFR Part 60 Subpart IIII. The diesel-fired engines will be subject to this subpart. The engines are also subject to NSPS IIII and will comply with NESHAP ZZZZ by complying with the requirements of NSPS IIII.

6. BACT ANALYSIS

BEST AVAILABLE CONTROL TECHNOLOGY (BACT) ANALYSIS

For the proposed project, a BACT analysis is required for NO_x emissions as the project-related NO_x emissions will exceed 100 tpy. BACT is analyzed using the “top-down” approach.

Guidance for the evaluation of BACT are found in DEQ’s *Major Source Construction Permits Advice*,¹ the Environmental Protection Agency’s (EPA)’s 1978 *Guidelines for Determining Best Available Control Technology*,² EPA’s 1990 *NSR Workshop Manual*,³ and an EPA memo from 1987.⁴

Based on this guidance, a top-down approach is preferred for conducting BACT analyses. In summary, under the top-down approach, the most stringent control available for a similar or identical source or source category is identified and a determination of feasibility is made; if the top level of control is determined to be infeasible because of technical, economic, environmental, or energy related reasons, then the next most stringent control option is evaluated; and this process continues until the BACT level under consideration cannot be eliminated. Presented below are the five basic steps of a top-down BACT review procedure according to the 1990 NSR Workshop Manual:

Step 1. Identify all control technologies. The first step in the BACT analysis is to identify all control options. Available control options are those with a “practical potential for application” to the emission unit and pollutant under evaluation.⁵ An integral part of the BACT analysis is a search of the U.S. EPA’s Reasonably Available Control Technology (RACT) / BACT / Lowest Achievable Emission Rate (LAER) Clearinghouse (RBLC).

Step 2. Eliminate technically infeasible options. The second step in the BACT analysis is to eliminate any technically infeasible control technologies. Each control technology for each pollutant is considered, and those that are clearly technically infeasible are eliminated. EPA states the following with regard to technical feasibility: “A demonstration of technical infeasibility should be clearly documented and should show, based on physical, chemical and engineering principles, that technical difficulties would preclude the successful use of the control option on the emissions unit under review.”⁶

Step 3. Rank remaining control technologies by control effectiveness. The control technologies are then ranked in order of effectiveness. If only one option remains or if all remaining options are equivalent, then ranking is not required.

¹ *Major Source Construction Permits Advice*, Dec. 28, 2011. Accessed at https://www.deq.ok.gov/wp-content/uploads/air-division/PG_Major_Source_Construction_Permit_Advice.pdf on Jan. 26, 2024.

² *Guidelines for Determining Best Available Control Technology (BACT)*, Dec. 1978. Accessed at <https://www.epa.gov/sites/default/files/2015-07/documents/bactupsd.pdf> on Jan. 26, 2024.

³ *New Source Review Workshop Manual – Prevention of Significant Deterioration and Nonattainment Area Permitting, Draft*, Oct. 1990. Accessed at <https://www.epa.gov/sites/default/files/2015-07/documents/1990wman.pdf> on Jan. 26, 2024.

⁴ *Improving New Source Review (NSR) Implementation*, J. Craig Potter, EPA’s Office of Air and Radiation, to the Regional Administrators, Dec. 1, 1987. Accessed at https://archive.epa.gov/airquality/ttnnsr01/web/html/p8_23.html on Jan. 26, 2024.

⁵ *New Source Review Workshop Manual – Prevention of Significant Deterioration and Nonattainment Area Permitting, Draft*, Oct. 1990, at B.5.

⁶ *Id.* at B.7.

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Step 4. Evaluate most effective controls and document results. The remaining control technologies are evaluated on the basis of economic, energy, and environmental considerations.

Step 5. Select BACT. The first four steps involve the evaluation of control technologies, but the selection of BACT involves an evaluation of achievable emission rates. The selected BACT emission rate is enforced as a standard unless technological or economic limitations would make the imposition of an emission standard infeasible, in which case a design, equipment, work practice, or operational standard can be imposed. Lastly, BACT must be no less stringent as any applicable New Source Performance Standards (NSPS).⁷

Emergency Engine BACT Analysis - NO_x Emissions

Acacia is proposing to install one hundred seventy-six (176) diesel-fired emergency generators (EU IDs G1 – G176) to provide power to the data center in the event of a power supply interruption, two (2) diesel-fired fire pumps (EU ID FP-1 – FP-2) for use in the event of a fire at the facility, and five (5) diesel-fired backup generators (EU ID GEN-1 -GEN-5) for the wastewater treatment plant, HUB, site entrance, and warehouse.

The RICE engines will be subject to NSPS Subpart IIII and NESHAP Subpart ZZZZ⁸. These regulations require purchasing RICE certified to applicable Tier standards, combusting only ultra-low sulfur diesel, and various monitoring, recordkeeping, and reporting. These Tier standards and accompanying requirements are taken as the baseline for this BACT analysis.

Step 1: Identify All Control Technologies

Using EPA's RACT/BACT/LAER Clearinghouse (RBLC) as a reference, the following air emissions controls for emergency diesel-fired, i.e., compression ignition (CI), RICE were identified:

- ▶ Good Combustion Practices (GCP)
- ▶ Selective Catalytic Reduction (SCR)

Queries of the RBLC reveals no installations of SCR on emergency, diesel-fired engines or on nonroad, diesel-fired engines⁹. SCR is nonetheless carried forward in this BACT analysis.

Good Combustion Practices

Good combustion practices include following concepts from engineering knowledge, experience, and manufacturer's recommendations to reduce NO_x emissions that are caused by oxidation of nitrogen in the combustion air during fuel combustion. Higher combustion temperatures and insufficiently mixed air and fuel in the cylinder can increase these emissions. Practices to reduce emissions can include, but are not limited to, proper equipment maintenance, routine inspections, and conducting overhauls as appropriate.

The remaining contents of this report discuss general hypothetical retrofit scenarios for these types of engines, but these scenarios are not based on an engineering analysis specific to each subject engine. These are unique engines and, if any analysis herein suggests that an engine may be amenable to add-on

⁷ *Id.* at B.12.

⁸ For new RICE at area sources the only requirement under NESHAP Subpart ZZZZ is to comply with NSPS Subpart IIII.

⁹ RBLC Basic Search queries were completed on August 26, 2025, for process types 17.110 and 17.210. Query results were filtered to only show records for NO_x emissions from diesel fuel-fired engines.

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controls as a function of a BACT analysis, then such engine would require a detailed, engineered engine health analysis and engineering and vendor assessment of whether that engine specifically can successfully accommodate such installation. Such detailed engineering assessments would provide more accuracy around technical feasibility and cost and may conclude that a particular control is, for example, not technically feasible to be successfully implemented, or not economically reasonable.

Selective Catalytic Reduction

SCR uses catalyzed reduction of NO_x with injected ammonia or urea solution. This technology is applicable to lean burn engines only (i.e., those with greater than about one percent exhaust oxygen, as oxygen is a reagent in the selective reduction reaction.) SCR produces unreacted ammonia (slip) and monitors are necessary to provide correct control of ammonia injection rates to minimize slip. SCR is considered technically feasible for all the affected units.

Step 2: Eliminate Technically Infeasible Options

All Step 1 control options are technically feasible.

Step 3: Rank Remaining Control Technologies by Effectiveness

GCP is a part of normal practice for emergency-use engines so no additional NO_x reduction can be attributed.

SCR is expected to be the most effective option followed by good combustion practices. A vendor quote shows that SCR is expected to reduce NO_x by 90%.

Step 4: Evaluate Most Effective Controls and Document Results

GCP is part of normal practice for emergency-use engines so no cost is associated with that option.

In its 2010 MACT/GACT evaluation for engines, EPA concluded for emergency engines: "Because these engines are typically used only a few number of hours per year [(27 hours per year per NFPA codes)], the costs of emission control are not warranted when compared to the emission reductions that would be achieved."¹⁰ The same conclusion would be true for intermittent-use engines such as the units Acacia is proposing. Based on EPA's assessment and the fact that the RBLC contains no records of SCR installation on emergency-use or nonroad engines, SCR is eliminated from consideration as BACT.

Step 5: Select BACT

The remaining control option, GCP, is proposed as BACT along with the requested g/hp-hr limits in the application for the diesel-fired emergency generators (EU IDs G1 – G176), diesel-fired fire pumps (EU ID FP-1 – FP-2), and diesel-fired backup generators (EU ID GEN-1 – GEN-5). As stated above, GCP for emergency engines is normal practice, i.e., operating the engines only for maintenance purposes, readiness testing, and during emergencies.

¹⁰ Ibid.

APPENDIX A. RBLC ENTRIES

Summary of NOX BACT Determinations for Diesel-Fired Emergency Engines

RBLC ID	FACILITY NAME	COMPANY NAME	PROCESS NAME	CONTROL METHOD DESCRIPTION
LA-0316	CAMERON LNG FACILITY	CAMERON LNG LLC	firewater pump engines (8 units)	Complying with 40 CFR 60 Subpart IIII
LA-0394	GEISMAR PLANT	SHELL CHEMICAL LP	06-22 - AO-5 Emergency Generator	Use of good combustion practices and compliance with NSPS Subpart IIII
LA-0403	SHINTECH PLAQUEMINE PLANT 4	SHINTCH LOUISIANA, LLC	4C-6A - C/A Emergency Generator A	Compliance with 40 CFR 60 Subpart IIII
LA-0403	SHINTECH PLAQUEMINE PLANT 4	SHINTCH LOUISIANA, LLC	4C-6B - C/A Emergency Generator B	Compliance with 40 CFR 60 Subpart IIII
LA-0403	SHINTECH PLAQUEMINE PLANT 4	SHINTCH LOUISIANA, LLC	4C-6C - C/A Emergency Generator C	Compliance with 40 CFR 60 Subpart IIII
LA-0403	SHINTECH PLAQUEMINE PLANT 4	SHINTCH LOUISIANA, LLC	4M-11A - VCM Emergency Generator A	Compliance with 40 CFR 60 Subpart IIII
LA-0403	SHINTECH PLAQUEMINE PLANT 4	SHINTCH LOUISIANA, LLC	4M-11B - VCM Emergency Generator B	Compliance with 40 CFR 60 Subpart IIII
LA-0403	SHINTECH PLAQUEMINE PLANT 4	SHINTCH LOUISIANA, LLC	4U-10 - Utility Emergency Generator	Compliance with 40 CFR 60 Subpart IIII
LA-0403	SHINTECH PLAQUEMINE PLANT 4	SHINTCH LOUISIANA, LLC	4U-12 - VCM/CA/UT CCR Emergency Generator	Compliance with 40 CFR 60 Subpart IIII
LA-0403	SHINTECH PLAQUEMINE PLANT 4	SHINTCH LOUISIANA, LLC	4U-7A - Fire Water Pump A	Compliance with 40 CFR 60 Subpart IIII
LA-0403	SHINTECH PLAQUEMINE PLANT 4	SHINTCH LOUISIANA, LLC	4U-7B - Fire Water Pump B	Compliance with 40 CFR 60 Subpart IIII
LA-0403	SHINTECH PLAQUEMINE PLANT 4	SHINTCH LOUISIANA, LLC	4U-7C - Fire Water Pump C	Compliance with 40 CFR 60 Subpart IIII
LA-0394	GEISMAR PLANT	SHELL CHEMICAL LP	53-22 - PAO Emergency Generator	Use of good combustion practices, compliance with NSPS Subpart IIII
KY-0115	NUCOR STEEL GALLATIN, LLC	NUCOR STEEL GALLATIN, LLC	Air Separation Unit Emergency Generator (EP 08-08)	The permittee must develop a Good Combustion and Operating Practices (GCOP) Plan
IN-0371	WABASH VALLEY RESOURCES, LLC		Ammonia Plant Emergency Generator	Good Combustion Practices and meeting NSPS Subpart IIII requirements.
AK-0084	DONLIN GOLD PROJECT	DONLIN GOLD LLC.	Black Start and Emergency Internal Combustion Engines	Good Combustion Practices
KY-0115	NUCOR STEEL GALLATIN, LLC	NUCOR STEEL GALLATIN, LLC	Caster B Emergency Generator (EP 08-07)	The permittee must develop a Good Combustion and Operating Practices (GCOP) Plan
LA-0312	ST. JAMES METHANOL PLANT	SOUTH LOUISIANA METHANOL LP	DEG1-13 - Diesel Fired Emergency Generator Engine (EQT0012)	Compliance with NSPS Subpart IIII
LA-0312	ST. JAMES METHANOL PLANT	SOUTH LOUISIANA METHANOL LP	DFP1-13 - Diesel Fire Pump Engine (EQT0013)	Compliance with NSPS Subpart IIII
LA-0406	MCA GEIMAR SITE	MITSUBISHI CHEMICAL AMERICA, INC.	Diesel Emergency Generator (EQT0012)	Proper equipment design and good combustion practices. Use ultra-low sulfur diesel as fuel. Low emission combustion. Compliance with 40 CFR 60 Subpart IIII.
LA-0307	MAGNOLIA LNG FACILITY	MAGNOLIA LNG, LLC	Diesel Engines	good combustion practices, Use ultra low sulfur diesel, and comply with 40 CFR 60 Subpart IIII
LA-0305	LAKE CHARLES METHANOL FACILITY	LAKE CHARLES METHANOL, LLC	Diesel Engines (Emergency)	Complying with 40 CFR 60 Subpart IIII
AK-0088	LIQUEFACTION PLANT	ALASKA GASLINE DEVELOPMENT CORPORATION	Diesel Fire Pump Engine	Good Combustion Practices; Limited Operation; 40 CFR 60 Subpart IIII
MI-0448	GRAYLING PARTICLEBOARD	ARAUCO NORTH AMERICA	Diesel fire pump engine (EUFIREPUMP in FGRICE)	Certified Engines, Limited Operating Hours
MI-0421	GRAYLING PARTICLEBOARD	ARAUCO NORTH AMERICA	Dieselfire pump engine (EUFIREPUMP in FGRICE)	Certified engines, limited operating hours.
LA-0401	KOCH METHANOL (KME) FACILITY	KOCH METHANOL ST. JAMES, LLC	E. GEN 01 - Generac SD 2000	Compliance with the requirements of 40 CFR 60 Subpart IIII
LA-0401	KOCH METHANOL (KME) FACILITY	KOCH METHANOL ST. JAMES, LLC	E. GEN 02 - Generac SD 2000	Compliance with the requirements of 40 CFR 60 Subpart IIII
LA-0401	KOCH METHANOL (KME) FACILITY	KOCH METHANOL ST. JAMES, LLC	EGEN - Plant Emergency Generator	Compliance with 40 CFR 60 Subpart IIII
TX-0728	PEONY CHEMICAL MANUFACTURING FACILITY	BASF	Emergency Diesel Generator	Minimized hours of operations Tier II engine
WI-0300	NEMADJI TRAIL ENERGY CENTER	NEMADJI TRAIL ENERGY CENTER	Emergency Diesel Generator (P07)	Operation limited to 500 hours/year and operate and maintain according to the manufacturer's recommendations.
LA-0391	MAGNOLIA POWER GENERATING STATION UNIT 1	MAGNOLIA POWER LLC	Emergency Diesel Generator Engine	Compliance with 40 CFR 60 Subpart IIII, good combustion practices, and use of ultra-low sulfur diesel fuel.
MI-0421	GRAYLING PARTICLEBOARD	ARAUCO NORTH AMERICA	Emergency Diesel Generator Engine (EUEMRGRICE in FGRICE)	Certified engines, limited operating hours.
MI-0448	GRAYLING PARTICLEBOARD	ARAUCO NORTH AMERICA	Emergency diesel generator engine (EUEMRGRICE1 in FGRICE)	Certified engines, limited operating hours

Summary of NOX BACT Determinations for Diesel-Fired Emergency Engines

RBLC ID	FACILITY NAME	COMPANY NAME	PROCESS NAME	CONTROL METHOD DESCRIPTION
MI-0448	GRAYLING PARTICLEBOARD	ARAUCO NORTH AMERICA	Emergency diesel generator engine (EUEMRGRICE2 in FGRICE)	Certified Engines, Limited Operating Hours
AR-0161	SUN BIO MATERIAL COMPANY	SUN BIO MATERIAL COMPANY	Emergency Engines	Good Operating Practices, limited hours of operation, Compliance with NSPS Subpart IIII
AR-0163	BIG RIVER STEEL LLC	BIG RIVER STEEL LLC	Emergency Engines	Good Operating Practices, limited hours of operation, Compliance with NSPS Subpart IIII
LA-0383	LAKE CHARLES LNG EXPORT TERMINAL	LAKE CHARLES LNG EXPORT COMPANY, LLC	Emergency Engines (EQT0011 - EQT0016)	Comply with 40 CFR 60 Subpart IIII
LA-0382	BIG LAKE FUELS METHANOL PLANT	BIG LAKE FUELS LLC	Emergency Engines (EQT0014 - EQT0017)	Comply with standards of 40 CFR 60 Subpart IIII
IN-0317	RIVERVIEW ENERGY CORPORATION	RIVERVIEW ENERGY CORPORATION	Emergency fire pump EU-6008	Engine that complies with Table 4 to Subpart IIII of Part 60
TX-0876	PORT ARTHUR ETHANE CRACKER UNIT	MOTIVA ENTERPRISE LLC	Emergency generator	Tier 4 exhaust emission standards specified in 40 CFR Â§ 1039.101, limited to 100 hours per year of non-emergency operation
TX-0976	CORPUS CHRISTI LIQUEFACTION STAGE 3	CORPUS CHRISTI LIQUEFACTION, LLC	EMERGENCY GENERATOR	EPA Tier 2, limited to 100 hours per year of non-emergency operation. GHGs from the emergency engines will be limited through engine design and certification in accordance with standards, limited operational hours, and proper operation and maintenance
WI-0326	NEMADJI TRAIL ENERGY CENTER	NEMADJI TRAIL ENERGY CENTER	Emergency Generator	Good combustion practices and combusting clean fuels
IN-0371	WABASH VALLEY RESOURCES, LLC		Emergency Generator (400 kW)	Good Combustion Practices and meeting NSPS Subpart IIII requirements.
IN-0371	WABASH VALLEY RESOURCES, LLC		Emergency Generator (1000 kW)	Good Combustion Practices and meeting NSPS Subpart IIII requirements.
IN-0371	WABASH VALLEY RESOURCES, LLC		Emergency Generator (2000 kW)	Good Combustion Practices and meeting NSPS Subpart IIII requirements.
IN-0359	NUCOR STEEL	NUCOR STEEL	Emergency Generator (CC-GEN1)	certified engine
LA-0309	BENTELER STEEL TUBE FACILITY	BENTELER STEEL / TUBE MANUFACTURING CORPORATION	Emergency Generator Engines	Complying with 40 CFR 60 Subpart IIII
LA-0317	METHANEX - GEISMAR METHANOL PLANT	METHANEX USA, LLC	Emergency Generator Engines (4 units)	complying with 40 CFR 60 Subpart IIII and 40 CFR 63 Subpart ZZZZ
LA-0316	CAMERON LNG FACILITY	CAMERON LNG LLC	emergency generator engines (6 units)	Complying with 40 CFR 60 Subpart IIII
IN-0317	RIVERVIEW ENERGY CORPORATION	RIVERVIEW ENERGY CORPORATION	Emergency generator EU-6006	Tier II diesel engine
AR-0180	HYBAR LLC	HYBAR LLC	Emergency Generators	Good Operating Practices, limited hours of operation, Compliance with NSPS Subpart IIII
LA-0292	HOLBROOK COMPRESSOR STATION	CAMERON INTERSTATE PIPELINE LLC	Emergency Generators No. 1 & No. 2	Good equipment design, proper combustion techniques, use of low sulfur fuel, and compliance with 40 CFR 60 Subpart IIII
TX-0955	INEOS OLIGOMERS CHOCOLATE BAYOU	INEOS OLIGOMERS USA LLC	Engine Emergency Generator	TIER III ENGINE, OPERATIONS LIMITED TO 100 HRS/YR
KY-0110	NUCOR STEEL BRANDENBURG	NUCOR	EP 10-01 - Caster Emergency Generator	This EP is required to have a Good Combustion and Operating Practices (GCOP) Plan.
KY-0110	NUCOR STEEL BRANDENBURG	NUCOR	EP 10-02 - North Water System Emergency Generator	This EP is required to have a Good Combustion and Operating Practices (GCOP) Plan.
KY-0110	NUCOR STEEL BRANDENBURG	NUCOR	EP 10-03 - South Water System Emergency Generator	This EP is required to have a Good Combustion and Operating Practices (GCOP) Plan.
KY-0110	NUCOR STEEL BRANDENBURG	NUCOR	EP 10-04 - Emergency Fire Water Pump	This EP is required to have a Good Combustion and Operating Practices (GCOP) Plan.
KY-0110	NUCOR STEEL BRANDENBURG	NUCOR	EP 10-07 - Air Separation Plant Emergency Generator	This EP is required to have a Good Combustion and Operating Practices (GCOP) Plan.
MI-0433	MEC NORTH, LLC AND MEC SOUTH LLC	MARSHALL ENERGY CENTER LLC	EUENGINE (North Plant): Emergency Engine	Good combustion practices and meeting NSPS Subpart IIII requirements.
MI-0451	MEC NORTH, LLC	MARSHALL ENERGY CENTER, LLC	EUENGINE (North Plant): Emergency engine	Good combustion practices and meeting NSPS Subpart IIII requirements.

Summary of NOX BACT Determinations for Diesel-Fired Emergency Engines

RBLC ID	FACILITY NAME	COMPANY NAME	PROCESS NAME	CONTROL METHOD DESCRIPTION
MI-0433	MEC NORTH, LLC AND MEC SOUTH LLC	MARSHALL ENERGY CENTER LLC	EUENGINE (South Plant): Emergency Engine	Good combustion practices and meeting NSPS IIII requirements.
MI-0452	MEC SOUTH, LLC	MARSHALL ENERGY CENTER, LLC	EUENGINE (South Plant): Emergency engine	Good Combustion Practices and meeting NSPS Subpart IIII requirements
MI-0435	BELLE RIVER COMBINED CYCLE POWER PLANT	DTE ELECTRIC COMPANY	EUENGINE: Emergency engine	State of the art combustion design.
MI-0454	LBWL-ERICKSON STATION	LANSING BOARD OF WATER AND LIGHT	EUEMGD	Good combustion practices and will be NSPS compliant.
MI-0441	LBWL--ERICKSON STATION	LANSING BOARD OF WATER AND LIGHT	EUEMGD1--A 1500 HP diesel fueled emergency engine	Good combustion practices and will be NSPS compliant.
MI-0441	LBWL--ERICKSON STATION	LANSING BOARD OF WATER AND LIGHT	EUEMGD2--A 6000 HP diesel fuel fired emergency engine	Good combustion practices and will be NSPS compliant.
MI-0425	GRAYLING PARTICLEBOARD	ARAUCO NORTH AMERICA	EUEMGRICE1 in FGRICE (Emergency diesel generator engine)	Certified engines, limited operating hours.
MI-0425	GRAYLING PARTICLEBOARD	ARAUCO NORTH AMERICA	EUEMGRICE2 in FGRICE (Emergency Diesel Generator Engine)	Certified engines, limited operating hours
MI-0434	FLAT ROCK ASSEMBLY PLANT	FORD MOTOR COMPANY	EUENGINE01 through EUENGINE08	Good combustion practices.
MI-0425	GRAYLING PARTICLEBOARD	ARAUCO NORTH AMERICA	EUFIREPUMP in FGRICE (Diesel fire pump engine)	Certified engines. Limited operating hours.
MI-0418	WARREN TECHNICAL CENTER	GENERAL MOTORS TECHNICAL CENTER - WARREN	FG-BACKUPGENS (Nine (9) DRUPS Emergency Engines)	No add-on controls, but injection timing retardation (ITR) is good design. Engines are tuned for low-NOx operation versus low CO operation.
LA-0324	COMMONWEALTH LNG FACILITY	COMMONWEALTH LNG, LLC	Firewater Pump Engine (EQT0017 - EQT0020)	Compliance with 40 CFR 60 Subpart IIII and operating engines per manufacturers' instructions and written procedures designed to maximize combustion efficiency and minimize fuel usage.
LA-0317	METHANEX - GEISMAR METHANOL PLANT	METHANEX USA, LLC	Firewater pump Engines (4 units)	complying with 40 CFR 60 Subpart IIII and 40 CFR 63 Subpart ZZZZ
MI-0418	WARREN TECHNICAL CENTER	GENERAL MOTORS TECHNICAL CENTER - WARREN	Four (4) emergency engines in FG-BACKUPGENS	No add-on controls, but injection timing retardation (ITR) is good design. Engines are tuned for low-NOx operation versus low CO operation.
LA-0324	COMMONWEALTH LNG FACILITY	COMMONWEALTH LNG, LLC	Generator Engines (EQT0016)	Compliance with 40 CFR 60 Subpart IIII and operating engines per manufacturers' instructions and written procedures designed to maximize combustion efficiency and minimize fuel usage.
KY-0115	NUCOR STEEL GALLATIN, LLC	NUCOR STEEL GALLATIN, LLC	New Pumphouse (XB13) Emergency Generator #1 (EP 08-05)	The permittee must develop a Good Combustion and Operating Practices (GCOP) Plan
LA-0313	ST. CHARLES POWER STATION	ENTERGY LOUISIANA, LLC	SCPS Emergency Diesel Generator 1	Compliance with NESHAP 40 CFR 63 Subpart ZZZZ and NSPS 40 CFR 60 Subpart IIII, and good combustion practices (use of ultra-low sulfur diesel fuel).
KY-0115	NUCOR STEEL GALLATIN, LLC	NUCOR STEEL GALLATIN, LLC	Tunnel Furnace Emergency Generator (EP 08-06)	The permittee must develop a Good Combustion and Operating Practices (GCOP) Plan
LA-0394	GEISMAR PLANT	SHELL CHEMICAL LP	05-22 - AO-5 BDL Area PAD Sump Pump Driver	Use of good combustion practices and compliance with NSPS Subpart IIII
LA-0403	SHINTECH PLAQUEMINE PLANT 4	SHINTCH LOUISIANA, LLC	4M-11C - VCM Emergency Pump A	Compliance with 40 CFR 60 Subpart IIII
LA-0403	SHINTECH PLAQUEMINE PLANT 4	SHINTCH LOUISIANA, LLC	4M-11D - VCM Emergency Pump B	Compliance with 40 CFR 60 Subpart IIII
LA-0403	SHINTECH PLAQUEMINE PLANT 4	SHINTCH LOUISIANA, LLC	4M-11E - VCM Emergency Pump C	Compliance with 40 CFR 60 Subpart IIII
LA-0403	SHINTECH PLAQUEMINE PLANT 4	SHINTCH LOUISIANA, LLC	4U-11 - Substation Emergency Generator	Compliance with 40 CFR 60 Subpart IIII
LA-0394	GEISMAR PLANT	SHELL CHEMICAL LP	52-22 - PAO Area PAD Sump Pump Driver	Use of good combustion practices, compliance with NSPS Subpart IIII
AK-0088	LIQUEFACTION PLANT	ALASKA GASLINE DEVELOPMENT CORPORATION	Auxiliary Air Compressor Engine	Good Combustion Practices; Limited Operation; 40 CFR 60 Subpart IIII
KY-0115	NUCOR STEEL GALLATIN, LLC	NUCOR STEEL GALLATIN, LLC	Cold Mill Complex Emergency Generator (EP 09-05)	The permittee must develop a Good Combustion and Operating Practices (GCOP) Plan

Summary of NOX BACT Determinations for Diesel-Fired Emergency Engines

RBLC ID	FACILITY NAME	COMPANY NAME	PROCESS NAME	CONTROL METHOD DESCRIPTION
WI-0300	NEMADJI TRAIL ENERGY CENTER	NEMADJI TRAIL ENERGY CENTER	Emergency Diesel Fire Pump (P06)	Operation limited to 500 hours/year and shall be operated and maintained according to the manufacturer's recommendations.
LA-0391	MAGNOLIA POWER GENERATING STATION UNIT 1	MAGNOLIA POWER LLC	Emergency Diesel Fired Water Pump Engine	Compliance with 40 CFR 60 Subpart IIII, good combustion practices, and use of ultra-low sulfur diesel fuel.
IN-0359	NUCOR STEEL	NUCOR STEEL	Emergency Generator (CC-GEN2)	certified engine
AR-0180	HYBAR LLC	HYBAR LLC	Emergency Water Pumps	Good Operating Practices, limited hours of operation, Compliance with NSPS Subpart IIII
KY-0110	NUCOR STEEL BRANDENBURG	NUCOR	EP 11-01 - Melt Shop Emergency Generator	This EP is required to have a Good Combustion and Operating Practices (GCOP) Plan.
KY-0110	NUCOR STEEL BRANDENBURG	NUCOR	EP 11-02 - Reheat Furnace Emergency Generator	This EP is required to have a Good Combustion and Operating Practices (GCOP) Plan.
KY-0110	NUCOR STEEL BRANDENBURG	NUCOR	EP 11-03 - Rolling Mill Emergency Generator	This EP is required to have a Good Combustion and Operating Practices (GCOP) Plan.
KY-0110	NUCOR STEEL BRANDENBURG	NUCOR	EP 11-04 - IT Emergency Generator	This EP is required to have a Good Combustion and Operating Practices (GCOP) Plan.
KY-0110	NUCOR STEEL BRANDENBURG	NUCOR	EP 11-05 - Radio Tower Emergency Generator	This EP is required to have a Good Combustion and Operating Practices (GCOP) Plan.
MI-0434	FLAT ROCK ASSEMBLY PLANT	FORD MOTOR COMPANY	EUFIREPUMPENGs (2 emergency fire pump engines)	Good combustion practices.
MI-0423	INDECK NILES, LLC	INDECK NILES, LLC	EUFFENGINE (Emergency engine--diesel fire pump)	Good combustion practices and meeting NSPS Subpart IIII requirements.
MI-0433	MEC NORTH, LLC AND MEC SOUTH LLC	MARSHALL ENERGY CENTER LLC	EUFFENGINE (North Plant): Fire pump engine	Good combustion practices and meeting NSPS Subpart IIII requirements.
MI-0451	MEC NORTH, LLC	MARSHALL ENERGY CENTER, LLC	EUFFENGINE (North Plant): Fire Pump Engine	Good combustion practices and meeting NSPS Subpart IIII requirements.
MI-0433	MEC NORTH, LLC AND MEC SOUTH LLC	MARSHALL ENERGY CENTER LLC	EUFFENGINE (South Plant): Fire pump engine	Good combustion practices and meeting NSPS Subpart IIII requirements.
MI-0452	MEC SOUTH, LLC	MARSHALL ENERGY CENTER, LLC	EUFFENGINE (South Plant): Fire pump engine	Good Combustion Practices and meeting NSPS Subpart IIII requirements
MI-0435	BELLE RIVER COMBINED CYCLE POWER PLANT	DTE ELECTRIC COMPANY	EUFFENGINE: Fire pump engine	State of the art combustion design.
MI-0454	LBWL-ERICKSON STATION	LANSING BOARD OF WATER AND LIGHT	EUFFPRICE--A 315 HP diesel-fueled emergency engine	Good combustion practices.
MI-0434	FLAT ROCK ASSEMBLY PLANT	FORD MOTOR COMPANY	EULIFESAFETYENG - One diesel-fueled emergency engine/generator	Good combustion practices.
AK-0084	DONLIN GOLD PROJECT	DONLIN GOLD LLC.	Fire Pump Diesel Internal Combustion Engines	Good Combustion Practices
WI-0326	NEMADJI TRAIL ENERGY CENTER	NEMADJI TRAIL ENERGY CENTER	Fire Pump; S06/P06 - Emergency Diesel Fire Pump	Good combustion practices and combusting clean fuels: (a) P06 may not operate more than 500 hours per each 12 rolling calendar months. (b) P06 shall be operated and maintained according to the manufacturer's recommendations. (c) NOx emissions from P06 may not exceed 3.0 g/hp-hr.
LA-0309	BENTELER STEEL TUBE FACILITY	BENTELER STEEL / TUBE MANUFACTURING CORPORATION	Firewater Pump Engines	Complying with 40 CFR 60 Subpart IIII
LA-0401	KOCH METHANOL (KME) FACILITY	KOCH METHANOL ST. JAMES, LLC	FWP-01 - Firewater Pump Engine No. 1	Compliance with 40 CFR 60 Subpart IIII
LA-0401	KOCH METHANOL (KME) FACILITY	KOCH METHANOL ST. JAMES, LLC	FWP-02 - Firewater Pump Engine No. 2	Compliance with 40 CFR 60 Subpart IIII
LA-0401	KOCH METHANOL (KME) FACILITY	KOCH METHANOL ST. JAMES, LLC	FWP-03 - Firewater Pump Engine No. 3	Compliance with the requirements of 40 CFR 60 Subpart IIII
LA-0379	SHINTECH PLAQUEMINES PLANT 1	SHINTECH LOUISIANA, LLC	PVC Emergency Combustion Equipment 2A and 2B	Compliance with 40 CFR 60 Subpart IIII.
LA-0379	SHINTECH PLAQUEMINES PLANT 1	SHINTECH LOUISIANA, LLC	PVC Emergency Combustion Equipment A	Good combustion practices/gaseous fuel burning.
LA-0313	ST. CHARLES POWER STATION	ENTERGY LOUISIANA, LLC	SCPS Emergency Diesel Firewater Pump 1	Compliance with NESHAP 40 CFR 63 Subpart ZZZZ and NSPS 40 CFR 60 Subpart IIII, and good combustion practices (use of ultra-low sulfur diesel fuel).

Summary of NOX BACT Determinations for Diesel-Fired Emergency Engines

RBLC ID	FACILITY NAME	COMPANY NAME	PROCESS NAME	CONTROL METHOD DESCRIPTION
AR-0163	BIG RIVER STEEL LLC	BIG RIVER STEEL LLC	Emergency Engines	Good Combustion Practices
OH-0378	PTTGCA PETROCHEMICAL COMPLEX	PTTGCA PETROCHEMICAL COMPLEX	1,000 kW Emergency Generators (P008 - P010)	certified to the meet the emissions standards in Table 4 of 40 CFR Part 60, Subpart IIII, shall employ good combustion practices per the manufacturer's operating manual
OH-0387	INTEL OHIO SITE	INTEL OHIO SITE	5,051 bhp (3,768 kWm) Diesel-Fired Emergency Generators: P001 through P046	Certified to meet Tier 2 standards and good combustion practices
OH-0383	PETMIN USA INCORPORATED	PETMIN USA INCORPORATED	Diesel-fired emergency fire pumps (2) (P009 and P010)	Tier IV NSPS standards certified by engine manufacturer.
VA-0325	GREENSVILLE POWER STATION	VIRGINIA ELECTRIC AND POWER COMPANY	DIESEL-FIRED EMERGENCY GENERATOR 3000 kW (1)	Good Combustion Practices/Maintenance
WI-0284	SIO INTERNATIONAL WISCONSIN, INC. -ENERGY PLANT		Diesel-Fired Emergency Generators	The Use of Ultra-Low Sulfur Fuel and Good Combustion Practices
OH-0375	LONG RIDGE ENERGY GENERATION LLC - HANNIBAL POWER	LONG RIDGE ENERGY GENERATION LLC - HANNIBAL POWER	Emergency Diesel Fire Pump Engine (P002)	Good combustion design
OH-0377	HARRISON POWER	HARRISON POWER	Emergency Diesel Generator (P003)	Good combustion practices (ULSD) and compliance with 40 CFR Part 60, Subpart IIII
OH-0375	LONG RIDGE ENERGY GENERATION LLC - HANNIBAL POWER	LONG RIDGE ENERGY GENERATION LLC - HANNIBAL POWER	Emergency Diesel Generator Engine (P001)	Good combustion design
OH-0376	IRONUNITS LLC - TOLEDO HBI	IRONUNITS LLC - TOLEDO HBI	Emergency diesel-fired generator (P007)	Comply with NSPS 40 CFR 60 Subpart IIII
OH-0378	PTTGCA PETROCHEMICAL COMPLEX	PTTGCA PETROCHEMICAL COMPLEX	Emergency Diesel-fired Generator Engine (P007)	certified to the meet the emissions standards in Table 4 of 40 CFR Part 60, Subpart IIII, shall employ good combustion practices per the manufacturer's operating manual
LA-0364	FG LA COMPLEX	FG LA LLC	Emergency Fire Water Pumps	Compliance with the limitations imposed by 40 CFR 63 Subpart IIII and operating the engine in accordance with the engine manufacturer's instructions and/or written procedures designed to maximize combustion efficiency and minimize fuel usage.
OH-0366	CLEAN ENERGY FUTURE - LORDSTOWN, LLC	CLEAN ENERGY FUTURE - LORDSTOWN, LLC	Emergency generator (P003)	State-of-the-art combustion design
OH-0367	SOUTH FIELD ENERGY LLC	SOUTH FIELD ENERGY LLC	Emergency generator (P003)	State-of-the-art combustion design
OH-0370	TRUMBULL ENERGY CENTER	TRUMBULL ENERGY CENTER	Emergency generator (P003)	State-of-the-art combustion design
OH-0372	OREGON ENERGY CENTER	OREGON ENERGY CENTER	Emergency generator (P003)	State-of-the-art combustion design
OH-0368	PALLAS NITROGEN LLC	PALLAS NITROGEN LLC	Emergency Generator (P009)	good combustion control and operating practices and engines designed to meet the stands of 40 CFR Part 60, Subpart IIII
LA-0364	FG LA COMPLEX	FG LA LLC	Emergency Generator Diesel Engines	Compliance with the limitations imposed by 40 CFR 63 Subpart IIII and operating the engine in accordance with the engine manufacturer's instructions and/or written procedures designed to maximize combustion efficiency and minimize fuel usage.
OH-0374	GUERNSEY POWER STATION LLC	GUERNSEY POWER STATION LLC	Emergency Generators (2 identical, P004 and P005)	Certified to the meet the emissions standards in 40 CFR 89.112 and 89.113 pursuant to 40 CFR 60.4205(b) and 60.4202(a)(2). Good combustion practices per the manufacturer's operating manual.
OH-0379	PETMIN USA INCORPORATED	PETMIN USA INCORPORATED	Emergency Generators (P005 and P006)	Tier IV engine
MI-0423	INDECK NILES, LLC	INDECK NILES, LLC	EUENGINE (Diesel fuel emergency engine)	Tier IV NSPS standards certified by engine manufacturer.
MI-0445	INDECK NILES, LLC	INDECK NILES, LLC	EUENGINE (diesel fuel emergency engine)	Good combustion practices and meeting NSPS IIII requirements.
LA-0323	MONSANTO LULING PLANT	MONSANTO COMPANY	Fire Water Diesel Pump No. 3 Engine	Good Combustion Practices and meeting NSPS Subpart IIII requirements
LA-0323	MONSANTO LULING PLANT	MONSANTO COMPANY	Fire Water Diesel Pump No. 4 Engine	Proper operation and limits on hours operation for emergency engines and compliance with 40 CFR 60 Subpart IIII
LA-0331	CALCASIEU PASS LNG PROJECT	VENTURE GLOBAL CALCASIEU PASS, LLC	Firewater Pumps	Proper operation and limits on hours of operation for emergency engines and compliance with 40 CFR 60 Subpart IIII
				Good Combustion and Operating Practices.

Summary of NOX BACT Determinations for Diesel-Fired Emergency Engines

RBLC ID	FACILITY NAME	COMPANY NAME	PROCESS NAME	CONTROL METHOD DESCRIPTION
LA-0331	CALCASIEU PASS LNG PROJECT	VENTURE GLOBAL CALCASIEU PASS, LLC	Large Emergency Engines (>50kW)	Good Combustion and Operating Practices
WI-0286	SIO INTERNATIONAL WISCONSIN, INC. -ENERGY PLANT	SIO INTERNATIONAL	P42 -Diesel Fired Emergency Generator	Good Combustion Practices, The Use of an Engine Turbocharger and Aftercooler.
OH-0387	INTEL OHIO SITE	INTEL OHIO SITE	275 hp (205 kW) Diesel-Fired Emergency Fire Pump Engine	Certified to meet the standards in Table 4 of 40 CFR Part 60, Subpart IIII and good combustion practices
OH-0379	PETMIN USA INCORPORATED	PETMIN USA INCORPORATED	Black Start Generator (P007)	Tier IV engine Tier IV NSPS standards certified by engine manufacturer.
VA-0325	GREENSVILLE POWER STATION	VIRGINIA ELECTRIC AND POWER COMPANY	DIESEL-FIRED WATER PUMP 376 bph (1)	Good Combustion Practices/Maintenance
OH-0376	IRONUNITS LLC - TOLEDO HBI	IRONUNITS LLC - TOLEDO HBI	Emergency diesel-fueled fire pump (P006)	Comply with NSPS 40 CFR 60 Subpart IIII
OH-0377	HARRISON POWER	HARRISON POWER	Emergency Fire Pump (P004)	Good combustion practices (ULSD) and compliance with 40 CFR Part 60, Subpart IIII
OH-0374	GUERNSEY POWER STATION LLC	GUERNSEY POWER STATION LLC	Emergency Fire Pump (P006)	Certified to the meet the emissions standards in Table 4 of 40 CFR Part 60, Subpart IIII. Good combustion practices per the manufacturer's operating manual
OH-0368	PALLAS NITROGEN LLC	PALLAS NITROGEN LLC	Emergency Fire Pump Diesel Engine (P008)	good combustion control and operating practices and engines designed to meet the stands of 40 CFR Part 60, Subpart IIII
OH-0366	CLEAN ENERGY FUTURE - LORDSTOWN, LLC	CLEAN ENERGY FUTURE - LORDSTOWN, LLC	Emergency fire pump engine (P004)	State-of-the-art combustion design
OH-0367	SOUTH FIELD ENERGY LLC	SOUTH FIELD ENERGY LLC	Emergency fire pump engine (P004)	State-of-the-art combustion design
OH-0370	TRUMBULL ENERGY CENTER	TRUMBULL ENERGY CENTER	Emergency fire pump engine (P004)	State-of-the-art combustion design
OH-0372	OREGON ENERGY CENTER	OREGON ENERGY CENTER	Emergency fire pump engine (P004)	State-of-the-art combustion design
MI-0445	INDECK NILES, LLC	INDECK NILES, LLC	EUPENGINE (Emergency engine-diesel fire pump)	Good Combustion Practices and meeting NSPS Subpart IIII requirements
OH-0378	PTTGCA PETROCHEMICAL COMPLEX	PTTGCA PETROCHEMICAL COMPLEX	Firewater Pumps (P005 and P006)	Certified to the meet the emissions standards in Table 4 of 40 CFR Part 60, Subpart IIII and employ good combustion practices per the manufacturer's operating manual
LA-0323	MONSANTO LULING PLANT	MONSANTO COMPANY	Standby Generator No. 9 Engine	Proper operation and limits on hours of operation for emergency engines and compliance with 40 CFR 60 Subpart IIII
IN-0263	MIDWEST FERTILIZER COMPANY LLC	MIDWEST FERTILIZER COMPANY LLC	EMERGENCY GENERATORS (EU014A AND EU-014B)	GOOD COMBUSTION PRACTICES
FL-0367	SHADY HILLS COMBINED CYCLE FACILITY	SHADY HILLS ENERGY CENTER, LLC	1,500 kW Emergency Diesel Generator	Operate and maintain the engine according to the manufacturer's written instructions
NJ-0084	PSEG FOSSIL LLC SEWAREN GENERATING STATION	PSEG FOSSIL LLC	Diesel Fired Emergency Generator	use of ultra low sulfur diesel a clean burning fuel.
WV-0033	MAIDSVILLE	MOUNTAIN STATE CLEAN ENERGY, LLC	Emergency Generator	Combustion Control (retarded timing and/or lean burn)
WV-0027	INWOOD	KNAUF INSULATION INC.	Emergency Generator - ESDG14	Engine Design
WV-0033	MAIDSVILLE	MOUNTAIN STATE CLEAN ENERGY, LLC	Fire Water Pump	Combustion control (retarded timing and/or lean burn)
AK-0085	GAS TREATMENT PLANT	ALASKA GASLINE DEVELOPMENT CORPORATION	One (1) Black Start Generator Engine	Good combustion practices, limit operation to 500 hours per year.
NJ-0084	PSEG FOSSIL LLC SEWAREN GENERATING STATION	PSEG FOSSIL LLC	Emergency Diesel Fire Pump	use of ULSD a clean burning fuel, and limited hours of operation
FL-0367	SHADY HILLS COMBINED CYCLE FACILITY	SHADY HILLS ENERGY CENTER, LLC	Emergency Fire Pump Engine (347 HP)	Operate and maintain the engine according to the manufacturer's written instructions
AK-0085	GAS TREATMENT PLANT	ALASKA GASLINE DEVELOPMENT CORPORATION	Three (3) Firewater Pump Engines and two (2) Emergency Diesel Generators	Good combustion practices, limit operation to 500 hours per year per engine
NY-0103	CRICKET VALLEY ENERGY CENTER	CRICKET VALLEY ENERGY CENTER LLC	Black start generator	Generator equipped with selective catalytic reduction. Compliance demonstrated with vendor emission certification and adherence to vendor-specified maintenance recommendations.

Summary of NOX BACT Determinations for Diesel-Fired Emergency Engines

RBLC ID	FACILITY NAME	COMPANY NAME	PROCESS NAME	CONTROL METHOD DESCRIPTION
VA-0328	C4GT, LLC	NOVI ENERGY	Emergency Diesel GEN	good combustion practices and the use of ultra low sulfur diesel (S15 ULSD) fuel oil with a maximum sulfur content of 15 ppmw.
VA-0332	CHICKAHOMINY POWER LLC	CHICKAHOMINY POWER LLC	Emergency Diesel Generator - 300 kW	good combustion practices, high efficiency design, and the use of ultra low sulfur diesel (S15 ULSD) fuel oil with a maximum sulfur content of 15 ppmw.
TX-0904	MOTIVA POLYETHYLENE MANUFACTURING COMPLEX		EMERGENCY GENERATOR	100 HOURS OPERATIONS, Tier 4 exhaust emission standards specified in 40 CFR Â§ 1039.101
TX-0905	DIAMOND GREEN DIESEL PORT ARTHUR FACILITY	DIAMOND GREEN DIESEL	EMERGENCY GENERATOR	limited to 100 hours per year of non-emergency operation
MN-0095	BLUE LAKE	XCEL ENERGY	Emergency Generator 2 (EQUI 26)	Emergency classification, hourly restriction, and NSPS compliance
MN-0095	BLUE LAKE	XCEL ENERGY	Emergency Generator 3 (EQUI 27)	Emergency classification, hourly restriction, and NSPS compliance
MN-0095	BLUE LAKE	XCEL ENERGY	Emergency Generator 4 (EQUI 28)	Emergency classification, hourly restriction, and NSPS compliance
MN-0095	BLUE LAKE	XCEL ENERGY	Emergency Generator 5 (EQUI 43)	Emergency classification, hourly restriction, and NSPS compliance
MN-0095	BLUE LAKE	XCEL ENERGY	Emergency Generator 6 (EQUI 43)	Emergency classification, hourly restriction, and NSPS compliance
VA-0332	CHICKAHOMINY POWER LLC	CHICKAHOMINY POWER LLC	Emergency Fire Water Pump	good combustion practices, high efficiency design, and the use of ultra low sulfur diesel (S15 ULSD) fuel oil with a maximum sulfur content of 15 ppmw.
NY-0103	CRICKET VALLEY ENERGY CENTER	CRICKET VALLEY ENERGY CENTER LLC	Emergency fire pump	Compliance demonstrated with vendor emission certification and adherence to vendor-specified maintenance recommendations.
VA-0328	C4GT, LLC	NOVI ENERGY	Emergency Fire Water Pump	Good combustion practices and the use of ultra low sulfur diesel (S15 ULSD) fuel oil with a maximum sulfur content of 15 ppmw.
IN-0384	SYCAMORE RIVERSIDE ENERGY LLC	INVENERGY THERMAL DEVELOPMENT LLC	Black Start Emergency Generators	GOOD COMBUSTION PRACTICES AND LOW SULFUR FUELS
TX-0879	MOTIVA PORT ARTHUR TERMINAL	MOTIVA ENTERPRISES LLC	Emergency Firewater Engine	Meeting the requirements of 40 CFR Part 60, Subpart IIII. Firing ultra-low sulfur diesel fuel (no more than 15 ppm sulfur by weight). Limited to 100 hrs/yr of non-emergency operation. Have a non-resettable runtime meter.
TX-0888	ORANGE POLYETHYLENE PLANT	CHEVRON PHILLIPS CHEMICAL COMPANY LP	EMERGENCY GENERATORS & FIRE WATER PUMP ENGINES	well-designed and properly maintained engines and each limited to 100 hours per year of non-emergency use.
IN-0384	SYCAMORE RIVERSIDE ENERGY LLC	INVENERGY THERMAL DEVELOPMENT LLC	plant emergency generator	good combustion practices and low sulfur fuel
IN-0384	SYCAMORE RIVERSIDE ENERGY LLC	INVENERGY THERMAL DEVELOPMENT LLC	emergency fire water pump	Good combustion practices, low sulfur fuel
TX-0933	NACERO PENWELL FACILITY	NACERO TX 1 LLC	Emergency Generators	limited to 100 hours per year of non-emergency operation. EPA Tier 2 (40 CFR Â§ 1039.101) exhaust emission standards

Modeling files are considered CBI

Modeling files include all counts and emissions for proposed equipment.

Dispersion modeling is required to demonstrate compliance with the National Ambient Air Quality Standard (NAAQS) for NO₂ because project-related emissions exceed 100 tpy for this pollutant. The dispersion modeling for this project will be provided under separate cover.

8. EMISSIONS CALCULATIONS

Emissions calculations are considered CBI

Emissions calculations provided included all emissions for proposed equipment, including engine emission factors.

9. SUPPORTING DOCUMENTATION

Supporting documentation is considered CBI

Supporting documentation provided included manufacture specification sheets.