

AIR QUALITY STANDARD PERMIT REGISTRATION FOR ELECTRIC GENERATING UNITS

CN606076008

RN TBD

Prepared for:

VoltaGrid, LLC
VoltaGrid SAT-2 EGU
San Antonio, TX

Prepared By:

Ramboll Americas Engineering Solutions, Inc.
Houston, TX

Date

September 2025

CONTENTS

1.	INTRODUCTION	1
2.	TCEQ FORM PI-1S	3
3.	FORM PI-1S, SECTION VI: TECHNICAL INFORMATION	4
3.1	General and Specific Requirements Checklists	4
4.	AIR QUALITY STANDARD PERMIT FOR ELECTRIC GENERATING UNITS	5
4.1	30 TAC 116 Subchapter F: Standard Permits §116.610 - Applicability	5
4.2	30 TAC 116 Subchapter F: Standard Permits §116.611 - Registration to Use a Standard Permit	7
4.3	30 TAC 116 Subchapter F: Standard Permits §116.615 - General Conditions	9
4.4	Air Quality Standard Permit for Electric Generating Units	13
4.5	State Regulation Applicability	18
4.6	Federal Applicability	20
5.	GENERATOR SPECIFICATIONS	21
5.1	Source Description	21
5.1.1	Equipment Description	21
5.1.2	Operation Schedule	21
5.2	Process Flow Diagram	22
5.3	Emissions Data and Calculations	22
5.3.1	Pollutants	22
5.3.2	Derivation of Criteria Pollutant Emission Factors	22
5.3.3	Hazardous Air Pollutants (HAP) Emission Factors	22
APPENDIX A		23
APPENDIX B		24
APPENDIX C		25
APPENDIX D		26
APPENDIX E		27

TABLES

Table 1: Performance Data.....	21
Table 2: Operating Schedule	21

FIGURES

Figure 1: Process Flow Diagram	22
--------------------------------------	----

APPENDICES

Appendix A:	Emission Calculations
Appendix B:	Generator Vendor Data
Appendix C:	Table 1(a)
Appendix D:	Core Data Form
Appendix E:	Site Layout

1. INTRODUCTION

VoltaGrid LLC is submitting this air standard permit registration for the installation of thirty-six (36) new natural gas generators ("Generators"). Of the 36 units, there will be sixteen (16) generators with a capacity of 3310-kilowatt-electric (kWe) each and twenty (20) generators with a capacity of 4,810 kWe each. This project is proposed to be located at the VoltaGrid SAT-2 Electric Generating Unit (EGU) facility (the Facility), located at 5207 Rogers Road, Suite #2 in Bexar County in San Antonio, Texas. A site location map is provided in **Figure 1**.

Emissions from the Generators will include criteria air pollutants, including nitrogen oxides (NO_x), carbon monoxide (CO), particulate matter (PM), and volatile organic compounds (VOCs) from the use and combustion of natural gas. As explained in more detail throughout this application, compliance with all applicable rules and regulations is expected.

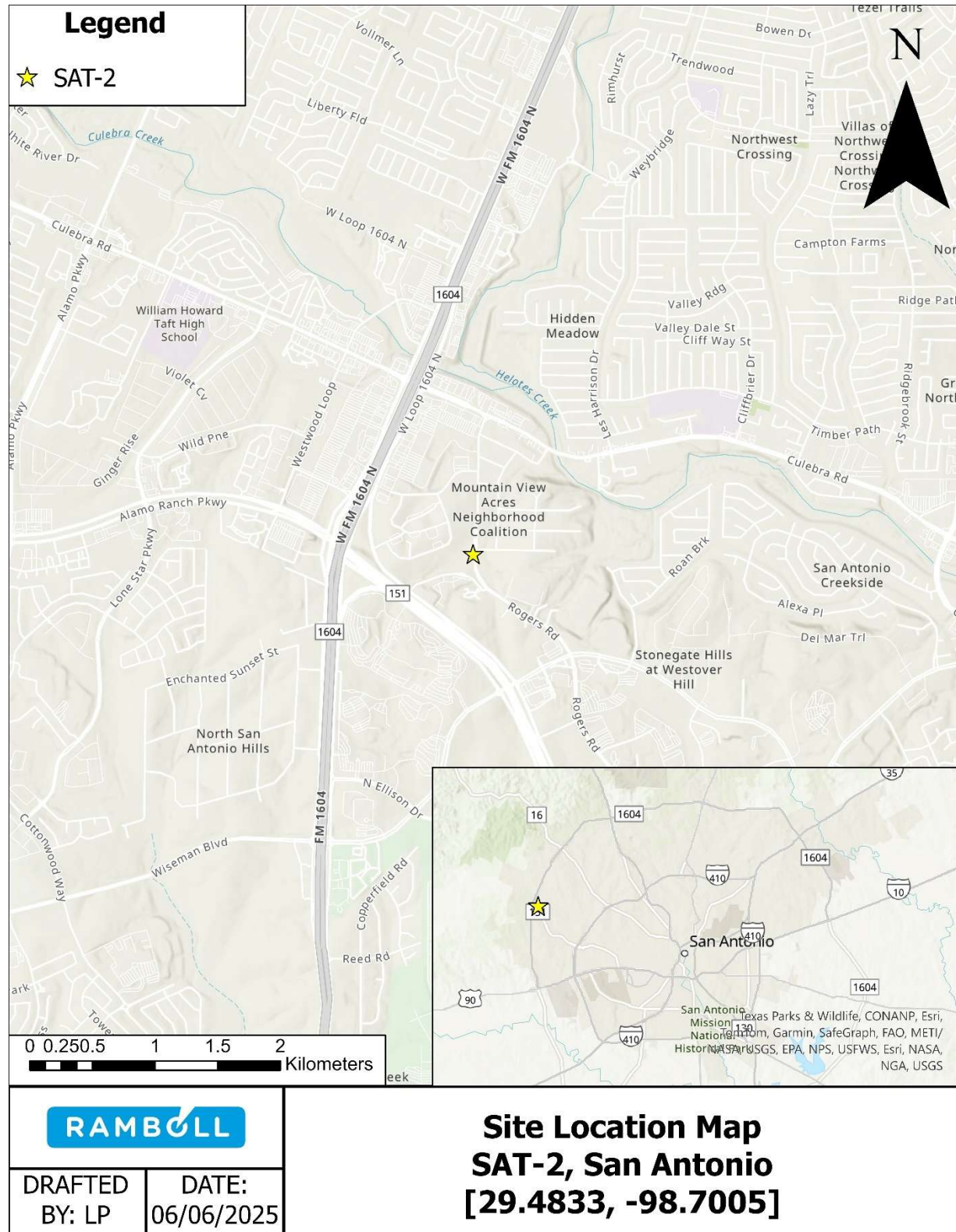
Activities included in this registration meet the general requirements for standard permits contained in 30 TAC §116.610-615, as well as the specific requirements of Electric Generating Units Standard Permit. The registration format corresponds to the Texas Commission on Environmental Quality (TCEQ) Form PI-1S (Registrations for Air Standard Permit) and demonstrates how the general and specific standard permit requirements are met.

As shown in the table below, the emissions covered by this registration are below the relevant New Source Review (NSR) major source thresholds. The facility is located in Bexar County, which was redesignated as serious nonattainment for ozone under the 2015 standard but is designated attainment or unclassifiable for all remaining standards. Since the project is in a nonattainment area for ozone, the Nonattainment NSR (NNSR) thresholds will apply for NO_x and VOCs, while the Prevention of Significant Deterioration (PSD) thresholds will apply for the remaining criteria pollutants. Ultimately, the Project will remain a minor source and; therefore, neither NNSR nor PSD regulations will apply to this application.

Pollutant	Project-Wide Emissions (tpy)	NSR Threshold ¹ (tpy)	Title V Threshold (tpy)
VOC	35.99	50	50
NO _x	38.72	50	50
CO	61.72	250	100
SO ₂	13.67	250	100
PM	26.19	250	100
PM ₁₀	26.19	250	100
PM _{2.5}	26.19	250	100
Pb	0	250	100

¹NSR Threshold Source: [TCEQ - Fact Sheet - PSD and Nonattainment \(texas.gov\)](#)

Figure 1 Site Location Map



2. TCEQ FORM PI-1S

Form PI-1S
Registrations for Air Standard Permit
(Page 1)
Texas Commission on Environmental Quality

I. Registrant Information
A. Company or Other Legal Customer Name:
VoltaGrid, LLC
B. Company Official Contact Information (☒ Mr. ☐ Mrs. ☐ Ms. ☐ Other:)
Name: Korby Bracken
Title: Senior Director - Health, Safety & Environment
Mailing Address: 10800 Telge Road
City: Houston
State: TX
ZIP Code: 77095
Telephone No.: (307) 630-1430
Fax No.:
Email Address: Korby.Bracken@VoltaGrid.com
<i>All permit correspondence will be sent via email.</i>
C. Technical Contact Information (☒ Mr. ☐ Mrs. ☐ Ms. ☐ Other:)
Name: Korby Bracken
Title: Senior Director - Health, Safety & Environment
Company Name: VoltaGrid, LLC
Mailing Address: 10800 Telge Road
City: Houston
State: TX
ZIP Code: 77095
Telephone No.: (307) 630-1430
Fax No.:
Email Address: Korby.Bracken@VoltaGrid.com
II. Facility and Site Information
A. Name and Type of Facility
Facility Name: VoltaGrid SAT-2 EGU
Type of Facility: ☒ Permanent ☐ Temporary

Form PI-1S
Registrations for Air Standard Permit
(Page 2)
Texas Commission on Environmental Quality

II. Facility and Site Information (<i>continued</i>)
For portable units, please provide the serial number of the equipment being authorized below.
Serial No(s):
B. Facility Location Information
Street Address: 5207 Rogers Road, Suite #2
If there is no street address, provide written driving directions to the site and provide the closest city or town, county, and ZIP code for the site (attach description if additional space is needed).
City: San Antonio
County: Bexar
ZIP Code: 78251
C. Core Data Form (required for Standard Permits 6006, 6007, and 6013).
Is the Core Data Form (TCEQ Form 10400) attached? ☒ Yes ☐ No
Customer Reference Number (CN): 606076008
Regulated Entity Number (RN):
D. TCEQ Account Identification Number (if known): BGA034H
E. Type of Action
☒ Initial Application ☐ Change to Registration ☐ Renewal ☐ Renewal Certification
For Change to Registration, Renewal, or Renewal Certification actions provide the following:
Registration Number:
Expiration Date:
F. Standard Permit Claimed: 6005 - Electric Generating Unit
G. Previous Standard Exemption or PBR Registration Number:
Is this authorization for a change to an existing facility previously authorized under a standard exemption or PBR? ☐ Yes ☒ No
If "Yes," enter previous standard exemption number(s) and PBR registration number(s) and associated effective date in the spaces provided below.
N/A

Form PI-1S
Registrations for Air Standard Permit
(Page 3)
Texas Commission on Environmental Quality

II. Facility and Site Information (<i>continued</i>)
H. Other Facilities at this Site Authorized by Standard Exemption, PBR, or Standard Permit
Are there any other facilities at this site that are authorized by an Air Standard Exemption, PBR, or Standard Permit? ☐ Yes ☒ No
If "Yes," enter standard exemption number(s), PBR registration number(s), and Standard Permit registration number(s), and associated effective date in the spaces provided below.
Standard Exemption, PBR Registration, and Standard Permit Registration Number(s) and Effective Date(s)
I. Other Air Preconstruction Permits
Are there any other air preconstruction permits at this site? ☐ Yes ☒ No
If "Yes," enter permit number(s) in the spaces provided below.
J. Affected Air Preconstruction Permits
Does the standard permit directly affect any permitted facility? ☐ Yes ☒ No
If "Yes," enter permit number(s) in the spaces provided below.
K. Federal Operating Permit (FOP) Requirements
Is this facility located at a site that is required to obtain a FOP pursuant to 30 TAC Chapter 122? ☒ Yes ☐ No ☐ To Be Determined
Check the requirements of 30 TAC Chapter 122 that will be triggered if this standard permit is approved (<i>check all that apply</i>).
☒ Initial Application for a FOP ☐ Significant Revision for a SOP ☐ Minor Revision for a SOP
☐ Operational Flexibility/Off Permit Notification for a SOP ☐ Revision for a GOP
☐ To be Determined ☐ None
Identify the type(s) of FOP issued and/or FOP application(s) submitted/pending for the site. (<i>check all that apply</i>)
☐ SOP ☐ GOP ☐ GOP application/revision (submitted or under APD review) ☒ N/A
☐ SOP application/revision (submitted or under APD review)

Form PI-1S
Registrations for Air Standard Permit
(Page 4)
Texas Commission on Environmental Quality

III. Fee Information (go to www.tceq.texas.gov/epay to pay online)
A. Fee Amount: \$900
B. Voucher number from ePay: TBD
IV. Public Notice (if applicable)
A. Responsible Person (☐ Mr. ☐ Mrs. ☐ Ms. ☐ Other:) _____
Name: _____
Title: _____
Company: _____
Mailing Address: _____
City: _____
State: _____
ZIP Code: _____
Telephone No.: _____
Fax No.: _____
Email Address: _____
B. Technical Contact (☐ Mr. ☐ Mrs. ☐ Ms. ☐ Other:) _____
Name: _____
Title: _____
Company: _____
Mailing Address: _____
City: _____
State: _____
ZIP Code: _____
Telephone No.: _____
Fax No.: _____
Email Address: _____
C. Bilingual Notice
Is a bilingual program required by the Texas Education Code in the School District? ☐ Yes ☐ No
Are the children who attend either the elementary school or the middle school closest to your facility eligible to be enrolled in a bilingual program provided by the district? ☐ Yes ☐ No

Form PI-1S
Registrations for Air Standard Permit
(Page 5)
Texas Commission on Environmental Quality

IV. Public Notice (<i>continued</i>) (if applicable) (continued)	
If "Yes," list which language(s) are required by the bilingual program below?	
D. Small Business Classification and Alternate Public Notice	
Does this company (including parent companies and subsidiary companies) have fewer than 100 employees or less than \$6 million in annual gross receipts?	☐ Yes ☐ No
Is the site a major source under 30 TAC Chapter 122, Federal Operating Permit Program?	☐ Yes ☐ No
Are the site emissions of any individual regulated air contaminant equal to or greater than 50 tpy?	☐ Yes ☐ No
Are the site emissions of all regulated air contaminant combined equal to or greater than 75 tpy?	☐ Yes ☐ No
V. Renewal Certification Option	
A. Does the permitted facility emit an air contaminant on the Air Pollutant Watch List, and is the permitted facility located in an area on the watch list?	☐ Yes ☐ No
B. For facilities participating in the Houston/Galveston/Brazoria area (HGB) cap and trade program for highly reactive VOCs (HRVOCs), do the HRVOCs need to be speciated on the maximum allowable emission rates table (MAERT)?	☐ Yes ☐ No
C. Does the company and/or site have an unsatisfactory compliance history?	☐ Yes ☐ No
D. Are there any applications currently under review for this standard permit registration?	☐ Yes ☐ No
E. Are scheduled maintenance, startup, or shutdown emissions required to be included in the standard permit registration at this time?	☐ Yes ☐ No
F. Are any of the following actions being requested at the time of renewal:	☐ Yes ☐ No
1. Are there any facilities that have been permanently shutdown that are proposed to be removed from the standard permit registration?	☐ Yes ☐ No
2. Do changes need to be made to the standard permit registration in order to remain in compliance?	☐ Yes ☐ No
3. Are sources or facilities that have always been present and represented, but never identified in the standard permit registration, proposed to be included with this renewal?	☐ Yes ☐ No
4. Are there any changes to the current emission rates table being proposed?	☐ Yes ☐ No
<i>Note: If answers to all of the questions in Section V. Renewal Certification Option are "No," use the certification option and skip to Section VII. of this form. If the answers to any of the questions in Section V. Renewal Certification Option are "Yes," the certification option cannot be used.</i>	
<i>*If notice is applicable and comments are received in response to the public notice, the application does not qualify for the renewal certification option.</i>	

Form PI-1S
Registrations for Air Standard Permit
(Page 6)
Texas Commission on Environmental Quality

VI. Technical Information Including State and Federal Regulatory Requirements

Place a check next to the appropriate box to indicate what you have included in your submittal.

Note: Any technical or essential information needed to confirm that facilities are meeting the requirements of the standard permit must be provided. Not providing key information could result in an automatic deficiency and voiding of the project.

A. Standard Permit requirements
(Checklists are optional; however, your review will go faster if you provide applicable checklists.)

Did you demonstrate that the general requirements in 30 TAC Sections 116.610 and 116.615 are met? ☒ Yes ☐ No

Did you demonstrate that the individual requirements of the specific standard permit are met? ☒ Yes ☐ No

B. Confidential Information (All pages properly marked "CONFIDENTIAL"). ☒ Yes ☐ No

C. Process Flow Diagram. ☒ Yes ☐ No

D. Process Description. ☒ Yes ☐ No

E. Maximum Emissions Data and Calculations. ☒ Yes ☐ No

F. Plot Plan. ☒ Yes ☐ No

G. Projected Start Of Construction Date, Start Of Operation Date, and Length of Time at Site: ☒ Yes ☐ No

Projected Start of Construction (provide date): 11/05/2025

Projected Start of Operation (provide date): 11/19/2025

Length of Time at the Site: > 5 years

VII. Delinquent Fees and Penalties

This form **will not be processed** until all delinquent fees and/or penalties owed to the TCEQ or the Office of the Attorney General on behalf of the TCEQ are paid in accordance with the Delinquent Fee and Penalty Protocol. For more information regarding Delinquent Fees and Penalties, go to the TCEQ website at: www.tceq.texas.gov/agency/financial/fees/delin/index.html.

Form PI-1S
Registrations for Air Standard Permit
(Page 7)
Texas Commission on Environmental Quality

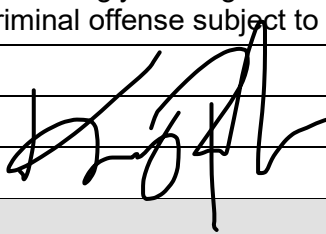
VIII. Signature Requirements

The signature below confirms that I have knowledge of the facts included in this application and that these facts are true and correct to the best of my knowledge and belief. I further state that to the best of my knowledge and belief, the project for which application is made will not in any way violate any provision of the Texas Water Code (TWC), Chapter 7; the Texas Health and Safety Code, Chapter 382, the Texas Clean Air Act (TCAA) the air quality rules of the Texas Commission on Environmental Quality; or any local governmental ordinance or resolution enacted pursuant to the TCAA. I further state that I understand my signature indicates that this application meets all applicable nonattainment, prevention of significant deterioration, or major source of hazardous air pollutant permitting requirements. The signature further signifies awareness that intentionally or knowingly making or causing to be made false material statements or representations in the application is a criminal offense subject to criminal penalties.

Name (printed): Korby Bracken

Signature (original signature required):

Date:



IX. Copies of the Registration

The PI-1S application must be submitted through ePermits. No additional copies need to be sent to the Regional Office or local Air Pollution Control Program(s). The link to ePermits can be found here:

www3.tceq.texas.gov/steers/

Reset Form

Print Form

3. FORM PI-1S, SECTION VI: TECHNICAL INFORMATION

3.1 General and Specific Requirements Checklists

This section contains the following TCEQ Checklists:

- 30 TAC §116.610-615 – Air Quality Standard Permits General Requirements Checklist

Texas Commission on Environmental Quality
Air Quality Standard Permits
General Requirements Checklist
Title 30 Texas Administrative Code §§116.610-116.615

Check the most appropriate answer and include any additional information in the spaces provided. If additional space is needed, please include an extra page and reference the rule number. The SP forms, tables, checklists, and guidance documents are available from the TCEQ, Air Permits Division web site at:
www.tceq.texas.gov/permitting/air/nav/standard.html.

Most Standard Permits require registration with the commission's Office of Permitting, Remediation, and Registration in Austin. The facilities and/or changes to facilities can be registered by completing a [Form PI-1S](#), "Registration for Air Standard Permit." This checklist should accompany the registration form to expedite any registration review.

CHECK THE MOST APPROPRIATE ANSWERS AND FILL IN THE REQUESTED INFORMATION		
Rule	Questions/Description	Response
116.610(a)(1)	Are there net emissions increases associated with this registration?	☒ YES ☐ NO
	<i>If "YES," will net emission increases of air contaminants from the project, other than those for which a National Ambient Air Quality Standard (NAAQS) has been established, meet the emission limits of § 106.261 or § 106.262?</i>	☒ YES ☐ NO
	<i>If "NO," does the specific standard permit exempt emissions from this limit?</i>	☒ YES ☐ NO
Attach emissions summary and calculations:		
116.610(a)(3)	Do any of the Title 40 Code of Federal Regulations Part (CFR) 60, New Source Performance Standards apply to this registration?	☒ YES ☐ NO
<i>If "YES," list subparts:</i> Subpart JJJJ		
116.610 (a)(4)	Do any Hazardous Air Pollutant requirements apply to this registration?	☐ YES ☒ NO
<i>If "YES," list subparts</i>		
116.610 (a)(5)	Do any maximum achievable control technology (MACT) standards as listed under 40 CFR Part 63 or Chapter 113, Subchapter C (National Emissions Standard for Hazardous Air for Source Categories) apply to this registration?	☒ YES ☐ NO
<i>If "YES," list subparts:</i> Subpart ZZZZ		
116.610(a)(6)	Will additional emission allowances under Chapter 101, Subchapter H, Division 3, Emissions Banking and Trading, need to be obtained following this registration?	☐ YES ☒ NO
116.611(a)(1-6)	Is the following documentation included with this registration:	☒ YES ☐ NO
	Emissions calculations including the basis of the calculations?	☒ YES ☐ NO
	Quantification of all emission increases and/or decreases associated with this project?	☒ YES ☐ NO
	Sufficient information demonstrating that this project does not trigger PSD or NNSR review?	☒ YES ☐ NO
	Description of efforts to minimize collateral emissions increases associated with this project?	☒ YES ☐ NO
	Process descriptions including related processes?	☒ YES ☐ NO
	Description of any equipment being installed?	☒ YES ☐ NO

Texas Commission on Environmental Quality
Air Quality Standard Permits
General Requirements Checklist
Title 30 Texas Administrative Code §§116.610-116.615

Rule	Question/Description	Response
116.614	Are the required fee and a copy of the check or money order provided with the application?	☒ YES ☐ NO
116.615(1)	Will emissions from the facility comply with all applicable rules and regulations of the commission adopted under Texas Health and Safety Code, Chapter 382, and with the intent of the Texas Clean Air Act?	☒ YES ☐ NO
116.615(2)	Do you understand that all representations with regard to construction plans, operating procedures, and maximum emission rates in this registration become conditions upon which the facility will be constructed and operated?	☒ YES ☐ NO
116.615(3)	Do you understand that all changes authorized by this registration need to be incorporated into the facility's permit if the facility is currently permitted under §116.110 (relating to Applicability)?	☒ YES ☐ NO
<i>List all related permit numbers:</i>		
116.615(9)617(e)(1)	Will all air pollution emission capture and abatement equipment be maintained in good working order?	☒ YES ☐ NO
116.615(10)	Will the facility comply with all applicable rules and regulations of the TCEQ, the Texas Health and Safety Code, Chapter 382, and the Texas Clean Air Act?	☒ YES ☐ NO

Save Form

Reset Form

4. AIR QUALITY STANDARD PERMIT FOR ELECTRIC GENERATING UNITS

The following section of the permit application provides an applicability determination of the standard permit for electric generating units. This demonstration is presented through line-by-line confirmation of all applicable requirements from the standard permit.

4.1 30 TAC 116 Subchapter F: Standard Permits §116.610 - Applicability

Requirement	Company Response
<i>(a) Under the Texas Clean Air Act, §382.051, a project that meets the requirements for a standard permit listed in this subchapter or issued by the commission is hereby entitled to the standard permit, provided the following conditions listed in this section are met. For the purposes of this subchapter, project means the construction or modification of a facility or a group of facilities submitted under the same registration.</i>	This site will comply with all applicable requirements for a standard permit.
<i>(1) Any project that results in a net increase in emissions of air contaminants from the project other than water, nitrogen, ethane, hydrogen, oxygen, or greenhouse gases (GHGs) as defined in §101.1 of this title (relating to Definitions), or those for which a national ambient air quality standard has been established must meet the emission limitations of §106.261 of this title (relating to Facilities (Emission Limitations)), unless otherwise specified by a particular standard permit.</i>	Not Applicable. The Air Quality Standard Permit for Electric Generating Units, paragraph (3)(A), states: "Units that meet the conditions of this standard permit do not have to meet 30 TAC § 116.610(a)(1), Applicability "
<i>(2) Construction or operation of the project must be commenced prior to the effective date of a revision to this subchapter under which the project would no longer meet the requirements for a standard permit.</i>	Construction and operation of the project will comply with the applicable rules in effect at the time of permit issuance.
<i>(3) The proposed project must comply with the applicable provisions of the Federal Clean Air Act (FCAA), §111 (concerning New Source Performance Standards) as listed under 40 Code of Federal Regulations (CFR) Part 60, promulgated by the United States Environmental Protection Agency (EPA).</i>	This site will comply with all applicable NSPS. Please see the Federal Regulation Applicability section for details.
<i>(4) The proposed project must comply with the applicable provisions of FCAA, §112 (concerning Hazardous Air Pollutants) as listed under 40 CFR Part 61, promulgated by the EPA.</i>	This site will comply with all applicable NESHAP. Please see the Federal Regulation Applicability section for details
<i>(5) The proposed project must comply with the applicable maximum achievable control technology standards as listed under 40 CFR Part 63, promulgated by the EPA under FCAA, §112</i>	This site will comply with all applicable MACT standards. Please see the Federal

Requirement	Company Response
<i>or as listed under Chapter 113, Subchapter C of this title (relating to National Emissions Standards for Hazardous Air Pollutants for Source Categories (FCAA, §112, 40 CFR Part 63)).</i>	Regulation Applicability section for details.
<i>(6) If subject to Chapter 101, Subchapter H, Division 3 of this title (relating to Mass Emissions Cap and Trade Program) the proposed facility, group of facilities, or account must obtain allocations to operate</i>	Not applicable. This site is not subject to the MECT program.
<i>(b) Any project that constitutes a new major stationary source or major modification as defined in §116.12 of this title (relating to Nonattainment and Prevention of Significant Deterioration Review Definitions) because of emissions of air contaminants other than greenhouse gases is subject to the requirements of §116.110 of this title (relating to Applicability) rather than this subchapter. Notwithstanding any provision in any specific standard permit to the contrary, any project that constitutes a new major stationary source or major modification which is subject to Subchapter B, Division 6 of this chapter (relating to Prevention of Significant Deterioration Review) due solely to emissions of greenhouse gases may use a standard permit under this chapter for air contaminants that are not greenhouse gases.</i>	This project does not constitute a new major source or major modification under PSD or nonattainment definitions. Please see the Emission Summary for details. Therefore, the use of a standard permit is allowed.
<i>(c) Persons may not circumvent by artificial limitations the requirements of §116.110 of this title.</i>	The requirements of §116.110 will not be circumvented.
<i>(d) Any project involving a proposed affected source (as defined in §116.15(1) of this title (relating to Section 112(g) Definitions)) shall comply with all applicable requirements under Subchapter E of this chapter (relating to Hazardous Air Pollutants: Regulations Governing Constructed or Reconstructed Major Sources (FCAA, §112(g), 40 CFR Part 63)). Affected sources subject to Subchapter E of this chapter may use a standard permit under this subchapter only if the terms and conditions of the specific standard permit meet the requirements of Subchapter E of this chapter.</i>	Not Applicable. No facilities in this project are subject to Subchapter E of Chapter 116 or are considered affected sources as defined in §116.15(1).

Source Note: The provisions of this §116.610 adopted to be effective May 4, 1994, 19 TexReg 3055; amended to be effective September 1, 1995, 20 TexReg 6324; amended to be effective April 19, 1996, 21 TexReg 3192; amended to be effective May 22, 1997, 22 TexReg 4242; amended to be effective July 8, 1998, 23 TexReg 6973; amended to be effective January 11, 2000, 25 TexReg 150; amended to be effective March 29, 2001, 26 TexReg 2398; amended to be effective February 1, 2006, 31 TexReg 515; amended to be effective April 17, 2014, 39 TexReg 2901

4.2 30 TAC 116 Subchapter F: Standard Permits §116.611 - Registration to Use a Standard Permit

Requirement	Company Response
<p>(a) <i>If required, registration to use a standard permit shall be submitted using the electronic method designated by the executive director for the applicable standard permit. If a designated electronic method is not available, the registration shall be sent by certified mail, return receipt requested, or hand delivered to the executive director, the appropriate commission regional office, and any local air pollution program with jurisdiction, before a standard permit can be used. The registration must be submitted using the required form and must document compliance with the requirements of this section, including, but not limited to:</i></p> <ul style="list-style-type: none"> <i>(1) the basis of emission estimates;</i> <i>(2) quantification of all emission increases and decreases associated with the project being registered;</i> <i>(3) sufficient information as may be necessary to demonstrate that the project will comply with §116.610(b) of this title (relating to Applicability);</i> <i>(4) information that describes efforts to be taken to minimize any collateral emissions increases that will result from the project;</i> <i>(5) a description of the project and related process; and</i> <i>(6) a description of any equipment being installed.</i> 	<p>All required information is included in this application.</p>
<p>(b) <i>Construction may begin any time after receipt of written notification from the executive director that there are no objections or 45 days after receipt by the executive director of the registration, whichever occurs first, except where a different time period is specified for a particular standard permit or the source obtains a prevention of significant deterioration permit for greenhouse gases as provided in §116.164(a) of this title (relating to Prevention of Significant Deterioration Applicability for Greenhouse Gases Sources).</i></p>	<p>Construction or implementation of changes being authorized by this application will not begin until written approval has been received from the TCEQ, or 45 days after submission of this application to the TCEQ, whichever occurs first.</p>
<p>(c) <i>In order to avoid applicability of Chapter 122 of this title (relating to Federal Operating Permits), a certified registration shall be submitted. The certified registration must state the maximum allowable emission rates and must include documentation of the basis of emission estimates and a written statement by the registrant certifying that the maximum emission rates listed on the registration reflect the reasonably</i></p>	<p>Site-wide emissions of certain pollutants exceed Title V permitting thresholds; therefore, a Title V permit will be obtained as required.</p>

Requirement	Company Response
<p><i>anticipated maximums for operation of the facility. The certified registration shall be amended if the basis of the emission estimates changes or the maximum emission rates listed on the registration no longer reflect the reasonably anticipated maximums for operation of the facility. The certified registration shall be submitted to the executive director; to the appropriate commission regional office; and to all local air pollution control agencies having jurisdiction over the site. Certified registrations must also be maintained in accordance with the requirements of §116.115 of this title (relating to General and Special Conditions).</i></p> <p><i>(1) Certified registrations established prior to December 11, 2002, shall be submitted on or before February 3, 2003.</i></p> <p><i>(2) Certified registrations established on or after December 11, 2002, shall be submitted no later than the date of operation.</i></p> <p><i>(3) Certified registrations established for greenhouse gases (as defined in §101.1 of this title (relating to Definitions)) on or after the effective date of United States Environmental Protection Agency's (EPA) final action approving amendments to §122.122 of this title (relating to Potential to Emit) into the State Implementation Plan shall be submitted:</i></p> <p><i>(A) for existing sites that emit or have the potential to emit greenhouse gases, no later than 12 months after the effective date of EPA's final action approving amendments to §122.122 of this title as a revision to the Federal Operating Permits Program; or</i></p> <p><i>(B) for new sites that emit or have the potential to emit greenhouse gases, no later than the date of operation.</i></p>	

4.3 30 TAC 116 Subchapter F: Standard Permits §116.615 - General Conditions

Requirement	Company Response
<i>The following general conditions are applicable to holders of standard permits, but will not necessarily be specifically stated within the standard permit document.</i>	All standard permit general conditions will be met.
<i>1) Protection of public health and welfare. The emissions from the facility, including dockside vessel emissions, must comply with all applicable rules and regulations of the commission adopted under Texas Health and Safety Code, Chapter 382, and with the intent of the Texas Clean Air Act (TCAA), including protection of health and property of the public.</i>	Emissions from this site will comply with all applicable rules and regulations and with the intent of the TCAA.
<p><i>(2) Standard permit representations. All representations with regard to construction plans, operating procedures, pollution control methods, and maximum emission rates in any registration for a standard permit become conditions upon which the facility or changes thereto, must be constructed and operated. It is unlawful for any person to vary from such representations if the change will affect that person's right to claim a standard permit under this section. Any change in condition such that a person is no longer eligible to claim a standard permit under this section requires proper authorization under §116.110 of this title (relating to Applicability). Any changes in representations are subject to the following requirements:</i></p> <p><i>(A) For the addition of a new facility, the owner or operator shall submit a new registration incorporating existing facilities with a fee, in accordance with §116.611 and §116.614 of this title, (relating to Registration to use a Standard Permit and Standard Permit Fees) prior to commencing construction. If the applicable standard permit requires public notice, construction of the new facility or facilities may not commence until the new registration has been issued by the executive director.</i></p> <p><i>(B) For any change in the method of control of emissions, a change in the character of the emissions, or an increase in the discharge of the various emissions, the owner or operator shall submit written notification to the executive director describing the change(s), along with the designated fee, no later than 30 days after the change.</i></p> <p><i>(C) For any other change to the representations, the owner or operator shall submit written notification to the</i></p>	All representations in this application with regard to construction plans, operating procedures, pollution control methods, and maximum emission rates are conditions upon which the site must be operated.

Requirement	Company Response
<p><i>executive director describing the change(s) no later than 30 days after the change.</i></p> <p><i>(D) Any facility registered under a standard permit which contains conditions or procedures for addressing changes to the registered facility which differ from subparagraphs (A) - (C) of this paragraph shall comply with the applicable requirements of the standard permit in place of subparagraphs (A) - (C) of this paragraph.</i></p>	
<p><i>(3) Standard permit in lieu of permit amendment. All changes authorized by standard permit to a facility previously permitted under §116.110 of this title shall be administratively incorporated into that facility's permit at such time as the permit is amended or renewed.</i></p>	<p>Not applicable. This site is not currently authorized under a 30 TAC §116.110 permit.</p>
<p><i>(4) Construction progress. Start of construction, construction interruptions exceeding 45 days, and completion of construction shall be reported to the appropriate regional office not later than 15 working days after occurrence of the event, except where a different time period is specified for a particular standard permit.</i></p>	<p>All required notifications will be submitted.</p>
<p><i>(5) Start-up notification.</i></p> <p><i>(A) The appropriate air program regional office of the commission and any other air pollution control agency having jurisdiction shall be notified prior to the commencement of operations of the facilities authorized by a standard permit in such a manner that a representative of the executive director may be present.</i></p> <p><i>(B) For phased construction, which may involve a series of units commencing operations at different times, the owner or operator of the facility shall provide separate notification for the commencement of operations for each unit.</i></p> <p><i>(C) Prior to beginning operations of the facilities authorized by the permit, the permit holder shall identify to the Office of Permitting, Remediation, and Registration, the source or sources of allowances to be utilized for compliance with Chapter 101, Subchapter H, Division 3 of this title (relating to Mass Emissions Cap and Trade Program).</i></p>	<p>All required notifications will be submitted.</p>

Requirement	Company Response
<i>(D) A particular standard permit may modify start-up notification requirements.</i>	
<i>(6) Sampling requirements. If sampling of stacks or process vents is required, the standard permit holder shall contact the commission's appropriate regional office and any other air pollution control agency having jurisdiction prior to sampling to obtain the proper data forms and procedures. All sampling and testing procedures must be approved by the executive director and coordinated with the regional representatives of the commission. The standard permit holder is also responsible for providing sampling facilities and conducting the sampling operations or contracting with an independent sampling consultant.</i>	If sampling or testing is required, all requirements will be met.
<i>(7) Equivalency of methods. The standard permit holder shall demonstrate or otherwise justify the equivalency of emission control methods, sampling or other emission testing methods, and monitoring methods proposed as alternatives to methods indicated in the conditions of the standard permit. Alternative methods must be applied for in writing and must be reviewed and approved by the executive director prior to their use in fulfilling any requirements of the standard permit.</i>	Not Applicable. No alternate control, sampling, testing, or monitoring methods are being requested.
<i>(8) Recordkeeping. A copy of the standard permit along with information and data sufficient to demonstrate applicability of and compliance with the standard permit shall be maintained in a file at the plant site and made available at the request of representatives of the executive director, the United States Environmental Protection Agency, or any air pollution control agency having jurisdiction. For facilities that normally operate unattended, this information shall be maintained at the nearest staffed location within Texas specified by the standard permit holder in the standard permit registration. This information must include, but is not limited to, production records and operating hours. Additional recordkeeping requirements may be specified in the conditions of the standard permit. Information and data sufficient to demonstrate applicability of and compliance with the standard permit must be retained for at least two years following the date that the information or data is obtained. The copy of the standard permit must be maintained as a permanent record.</i>	All required records will be maintained as specified.
<i>(9) Maintenance of emission control. The facilities covered by the standard permit may not be operated unless all air pollution emission capture and abatement equipment is maintained in good working order and operating properly during normal facility</i>	All air pollution emission capture and abatement equipment will be maintained and operated properly during normal facility

Requirement	Company Response
<i>operations. Notification for emissions events and scheduled maintenance shall be made in accordance with §101.201 and §101.211 of this title (relating to Emissions Event Reporting and Recordkeeping Requirements; and Scheduled Maintenance, Startup, and Shutdown Reporting and Recordkeeping Requirements).</i>	<i>operations. Notification of emission events or maintenance will be made in accordance with §101.201 and §101.211. All emissions controls will be maintained in good working order and operated properly.</i>
<i>(10) Compliance with rules. Registration of a standard permit by a standard permit applicant constitutes an acknowledgment and agreement that the holder will comply with all rules, regulations, and orders of the commission issued in conformity with the TCAA and the conditions precedent to the claiming of the standard permit. If more than one state or federal rule or regulation or permit condition are applicable, the most stringent limit or condition shall govern. Acceptance includes consent to the entrance of commission employees and designated representatives of any air pollution control agency having jurisdiction into the permitted premises at reasonable times to investigate conditions relating to the emission or concentration of air contaminants, including compliance with the 2.64" standard permit.</i>	<i>The permit holder will comply with all applicable rules and regulations, and with this intent of the TCAA.</i>
<p><i>(11) Distance limitations, setbacks, and buffer zones. Notwithstanding any requirement in any standard permit, if a standard permit for a facility requires a distance, setback, or buffer from other property or structures as a condition of the permit, the determination of whether the distance, setback, or buffer is satisfied shall be made on the basis of conditions existing at the earlier of:</i></p> <p><i>(A) the date new construction, expansion, or modification of a facility begins; or</i></p> <p><i>(B) the date any application or notice of intent is first filed with the commission to obtain approval for the construction or operation of the facility.</i></p>	<i>Compliance with any distance limitations, setbacks, or buffer zones will be based on conditions at the time of start of construction or application submission.</i>

Source Note: The provisions of this §116.615 adopted to be effective September 1, 1995, 20 TexReg 6324; amended to be effective May 22, 1997, 22 TexReg 4242; amended to be effective July 8, 1998, 23 TexReg 6973; amended to be effective March 29, 2001, 26 TexReg 2398; amended to be effective September 12, 2002, 27 TexReg 8546; amended to be effective March 15, 2007, 32 TexReg 1320; amended to be effective November 22, 2018, 43 TexReg 7540

4.4 Air Quality Standard Permit for Electric Generating Units

Requirement	Company Response
<i>This standard permit authorizes electric generating units that generate electricity for use by the owner or operator and/or generate electricity to be sold to the electric grid, and that meet all of the conditions listed below.</i>	All conditions below will be met.
(1) Applicability	
<i>(A) This standard permit may be used to authorize electric generating units installed or modified after the effective date of this standard permit and that meet the requirements of this standard permit.</i>	The generators are electric generating units and will meet the requirements of this standard permit as noted in subsequent sections.
<i>(B) This standard permit may not be used to authorize boilers. Boilers may be authorized under the Air Quality Standard Permit for Boilers; 30 TAC § 106.183, Boilers, Heaters, and Other Combustion Devices; or a permit issued under the requirements of 30 TAC Chapter 116.</i>	The generators are not boilers.
(2) Definitions	
<i>(A) East Texas Region - All counties traversed by or east of Interstate Highway 35 or Interstate Highway 37, including Bosque, Coryell, Hood, Parker, Somervell and Wise Counties.</i>	The company will use all terms as defined here.
<i>(B) Installed - a generating unit is installed on the site when it begins generating electricity.</i>	
<i>(C) West Texas Region - Includes all of the state not contained in the East Texas Region.</i>	
<i>(D) Renewable fuel - fuel produced or derived from animal or plant products, byproducts or wastes, or other renewable biomass sources, excluding fossil fuels. Renewable fuels may include, but are not limited to, ethanol, biodiesel, and biogas fuels.</i>	
(3) Administrative Requirements	
<i>(A) Electric generating units shall be registered in accordance with 30 TAC § 116.611, Registration to Use a Standard Permit, using a current Form PI-1S. Units that meet the conditions of this standard permit do not have to meet 30 TAC § 116.610(a)(1), Applicability.</i>	A current Form PI-1S is included in this application package.

Requirement	Company Response
<i>(B) Registration applications shall comply with 30 TAC § 116.614, Standard Permit Fees, for any single unit or multiple units at a site with a total generating capacity of 1 megawatt (MW) or greater. The fee for units or multiple units with a total generating capacity of less than 1 MW at a site shall be \$100.00. The fee shall be waived for units or multiple units with a total generating capacity of less than 1 MW at a site that have certified nitrogen oxides (NOx) emissions that are less than 10 percent of the standards required by this standard permit.</i>	The total generating capacity of the units to be authorized by this standard permit is greater than 1 MW. Therefore, the application fee is \$900.
<i>(C) No owner or operator of an electric generating unit shall begin construction and/or operation without first obtaining written approval from the executive director.</i>	The generators will be installed and operated upon TCEQ approval.
<p><i>(D) Records shall be maintained and provided upon request to the Texas Commission on Environmental Quality (TCEQ) for the following:</i></p> <p><i>(i) Hours of operation of the unit;</i></p> <p><i>(ii) Maintenance records, maintenance schedules, and/or testing reports for the unit to document re-certification of emission rates as required by subsection (4)(G) below; and</i></p> <p><i>(iii) Records to document compliance with the fuel sulfur limits in subsection (4)(C).</i></p>	VoltaGrid, LLC will maintain all records for the generator units as required by this section and will provide records upon request to TCEQ.
<i>(E) Electric generators powered by gas turbines must meet the applicable conditions, including testing and performance standards, of Title 40 Code of Federal Regulations (CFR) Part 60, Subpart GG, Standards of Performance for Stationary Gas Turbines, and applicable requirements of 40 CFR Part 60 Subpart KKKK, Standards of Performance for Stationary Combustion Turbines.</i>	Not Applicable. The electric generating units to be authorized by this standard permit are not powered by gas turbines.
<i>(F) Compliance with this standard permit does not exempt the owner or operator from complying with any applicable requirements of 30 TAC Chapter 117, Control of Air Pollution from Nitrogen Compounds, or 30 TAC Chapter 114, Control of Air Pollution from Motor Vehicles.</i>	VoltaGrid, LLC will comply with any applicable requirements of 30 TAC Chapter 117 and 30 TAC Chapter 114.
(4) General Requirements	

Requirement	Company Response
<p><i>(A) Emissions of NO_x from the electric generating unit shall be certified by the manufacturer or by the owner or operator in pounds of pollutant per megawatt hour (lb/MWh). This certification must be displayed on the name plate of the unit or on a label attached to the unit. Test results from U.S. Environmental Protection Agency (EPA) reference methods, California Air Resources Board methods, or equivalent alternative testing methods approved by the executive director used to verify this certification shall be provided upon request to the TCEQ. The unit must operate on the same fuel(s) for which the unit was certified.</i></p>	<p>The generators will be labeled with the NO_x emission rate in lb/MWh.</p>
<p><i>(B) Electric generating units that use combined heat and power (CHP) may take credit for the heat recovered from the exhaust of the combustion unit to meet the emission standards in subsections (4)(D), (4)(E), and (4)(F). Credit shall be at the rate of one MWh for each 3.4 million British Thermal Units of heat recovered. The following requirements must be met to take credit for CHP for units not sold and certified as an integrated package by the manufacturer:</i></p> <p><i>(i) The owner or operator must provide as part of the application documentation of the heat recovered, electric output, efficiency of the generator alone, efficiency of the generator including CHP, and the use for the non-electric output, and</i></p> <p><i>(ii) The heat recovered must equal at least 20 percent of the total energy output of the CHP unit.</i></p>	<p>This section is not applicable to the generators as they do not use CHP.</p>
<p><i>(C) Fuels combusted in these electric generating units are limited to:</i></p> <p><i>(i) Natural gas containing no more than ten grains total sulfur per 100 dry standard cubic feet;</i></p> <p><i>(ii) Landfill gas, digester gas, stranded oilfield gas, or gaseous renewable fuel containing no more than 30 grains total sulfur per 100 dry standard cubic feet; or</i></p> <p><i>(iii) Liquid fuels (including liquid renewable fuel) not containing waste oils or solvents and containing less than 0.05 percent by weight sulfur.</i></p>	<p>The generators will use natural gas which will contain no more than 10 grains total sulfur per 100 dry scf.</p>
<p><i>(D) Except as provided in subsections (4)(F) and (4)(H), NO_x emissions for units 10 MW or less shall meet the following limitations based upon the date the unit is installed and the region in which it operates:</i></p>	<p>NO_x emission rates will meet the applicable limit below.</p>

Requirement	Company Response
<p><i>East Texas Region:</i></p> <p>(i) Units installed prior to January 1, 2005 and</p> <p>(a) operating more than 300 hours per year - 0.47 lb/MWh;</p> <p>(b) operating 300 hours or less per year - 1.65 lb/MWh;</p> <p>(ii) Units installed on or after January 1, 2005 and</p> <p>(a) operating more than 300 hours per year, with a capacity greater than 250 kilowatts (kW) - 0.14 lb/MWh;</p> <p>(b) operating 300 hours or less per year - 0.47 lb/MWh; or</p> <p>(c) any unit with a capacity of 250 kW or less - 0.47 lb/MWh</p>	<p>The electric generating units will be located in the East Texas Region and will operate for more than 300 hours per year with a capacity greater than 250 kW. Therefore, they will be subject to and will meet the NOx limit of 0.14 lb/MWh.</p>
<p><i>West Texas Region:</i></p> <p>(i) Units operating more than 300 hours per year - 3.11 lb/MWh;</p> <p>(ii) Units operating 300 hours or less per year - 21 lb/MWh. Units certified to comply with applicable Tier 1, 2, or 3 emission standards in 40 CFR Part 89, Control of Emissions from New and In-Use Nonroad Compression-Ignition Engines, are deemed to satisfy this emission limit.</p>	<p>Not Applicable. The electric generating unit(s) will not be located in the West Texas Region.</p>
<p>(E) Except as provided in subsections (4)(F) and (4)(H), NOx emissions for units greater than 10 MW shall meet the following limitations:</p> <p>(i) Units operating more than 300 hours per year - 0.14 lb/MWh;</p> <p>(ii) Units operating 300 hours or less per year - 0.38 lb/MWh.</p>	<p>Not Applicable. The electric generating units are < 10 MW each.</p>
<p>(F) Electric generating units firing any gaseous or liquid fuel that is at least 75 percent landfill gas, digester gas, stranded oil field gas, or renewable fuel content by volume, shall meet a NOx emission limit of 1.90 lb/MWh. Units in West Texas with a capacity of 10 MW or less that fire at least 75 percent landfill gas, digester gas, stranded oilfield gases, or gaseous</p>	<p>Not Applicable. The electric generating units will not fire landfill gas, digester gas, stranded oil field gas, or renewable fuel.</p>

Requirement	Company Response
<i>or liquid renewable fuel by volume, must comply with the applicable West Texas NOx limit in subsection (4)(D).</i>	
<i>(G) To ensure continuing compliance with the emissions limitations, the owner or operator shall re-certify a unit every 16,000 hours of operation, but no less frequently than every three years. Re-certification may be accomplished by following a maintenance schedule that the manufacturer certifies will ensure continued compliance with the required NOx standard or by third party testing of the unit using appropriate EPA reference methods, California Air Resources Board methods, or equivalent alternative testing methods approved by the executive director to demonstrate that the unit still meets the required emission standards. After re-certification, the unit must operate on the same fuel(s) for which the unit was re-certified.</i>	VoltaGrid, LLC will ensure continuing compliance with the required NOx standard by re-certifying each unit every 16,000 hours of operation or at least every three years with a manufacturer-certified maintenance schedule.
<p><i>(H) The NOx emission limits in subsections (4)(D)-(4)(F) are subject to the following exceptions:</i></p> <p><i>(i) The hourly NOx emission limits do not apply at times when the ambient air temperature at the location of the unit is less than 0 degrees Fahrenheit.</i></p> <p><i>(ii) At times when a unit is operating at less than 80% of rated load, an alternative NOx emission standard for that unit may be determined by multiplying the applicable emission standard in subsections (4)(D)-(4)(F) by the rated load of the EGU (in MW), to produce an allowable hourly mass NOx emission rate. In order to use this alternative standard, an owner or operator must maintain records that demonstrate compliance with the alternative emission standard, and make such records available to the TCEQ or any local air pollution control agency with jurisdiction upon request.</i></p>	VoltaGrid, LLC will maintain records to demonstrate compliance with this section through recordkeeping as noted in this section if an alternative NOx emission standard for the unit(s) is used below 80% of rated load.

Effective Date May 16, 2007

4.5 State Regulation Applicability

30 TAC		Rule	Applicable (Yes/No)	Company Response
Chapter 101	<i>Subchapter A</i>	General Rules	Yes	This site will comply with all applicable general rules of this Subchapter.
	<i>Subchapter F, Division 1</i>	Emission Events	Yes	If an unauthorized emission event occurs, all required records will be maintained, and all required reports will be submitted.
	<i>Subchapter H, Division 3</i>	Mass Emission Cap and Trade Program	No	This site is not located in the HGB ozone nonattainment area.
Chapter 111	<i>Subchapter A, Division 1</i>	Visible Emissions	Yes	This site will comply with the applicable opacity limits and test methods specified in this division.
	<i>Subchapter A, Division 5</i>	Emission Limits on Nonagricultural Processes	Yes	This site will comply with the applicable PM emission limits specified in this division.
Chapter 112	<i>Subchapter A</i>	Control of Sulphur Dioxide	Yes	Emissions of SO ₂ will comply with all applicable requirements of this chapter.
	<i>Subchapter B</i>	Control of Hydrogen Sulfide	Yes	Emissions of H ₂ S will comply with all applicable requirements of this chapter.
Chapter 113	<i>Subchapter B</i>	National Emission Standards for Hazardous Air Pollutants (FCAA, §112, 40 CFR Part 61)	No	This site is not subject to 40 CFR 61, Subpart R. Therefore, it is not subject to this subchapter.
	<i>Subchapter D</i>	National Emission Standards for Hazardous Air Pollutants for Source Categories (FCAA, §112, 40 CFR Part 63)	Yes	This chapter addresses the control of hazardous air pollutants. The site will comply with all applicable standards of performance for hazardous air pollutants, as described in the Federal Regulation section.
Chapter 115	<i>Subchapter B, Division 1</i>	Storage of Volatile Organic Compounds	Yes	This site is located in a county subject to Chapter 115 and will comply with all

30 TAC		Rule	Applicable (Yes/No)	Company Response
				applicable requirements of this chapter.
	<i>Subchapter B, Division 2</i>	Vent Gas Control	Yes	This site is located in a county subject to Chapter 115 and will comply with all applicable requirements of this chapter.
	<i>Subchapter B, Division 7</i>	Oil and Natural Gas Service in Ozone Nonattainment Areas	Yes	This site is located in nonattainment area and will comply with all applicable requirements of this chapter.
Chapter 117	<i>Subchapter B</i>	Combustion Control at Major Industrial, Commercial, and Institutional Sources in Ozone Nonattainment Areas	No	Not applicable according to 30 TAC Chapter 117.200 as the site is not a major source.
	<i>Subchapter D</i>	Combustion Control at Minor Sources in Ozone Nonattainment Areas	No	This site is not located in a county subject to Chapter 117 Subchapter D.
Chapter 122	<i>Subchapter B</i>	Federal Operating Permits Program - Permit Requirements	Yes	Site-wide emissions exceed Title V permitting thresholds. A Title V permit will be obtained as required.

4.6 Federal Applicability

Title 40 CFR Part 60 – New Source Performance Standards (NSPS)

NSPS Subpart	Rule Title	Applicable (Yes/No)	Company Response
Subpart A	General Provisions	Yes	This site is subject to one or more NSPS and is, therefore, subject to the general provisions of this subpart.
Subpart JJJJ	Standards of Performance for Stationary Compression Ignition Internal Combustion Engine.	Yes	Engine(s) at this site are subject to this subpart and will comply as applicable.

Title 40 CFR Part 61 – National Emission Standards for Hazardous Air Pollutants (NESHAP)

NSPS Subpart	Rule Title	Applicable (Yes/No)	Company Response
Subpart A	General Provisions	No	The facilities to be authorized by this project are not subject to a NESHAP; therefore, they are not subject to the general provisions of this subpart.

Title 40 CFR Part 63 – National Emission Standards for Hazardous Air Pollutants (Maximum Achievable Control Technology, MACT)

NSPS Subpart	Rule Title	Applicable (Yes/No)	Company Response
Subpart A	General Provisions	Yes	This site is subject to one or more MACT standards and is, therefore, subject to the general provisions of this subpart.
Subpart ZZZZ	National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines	Yes	Engine(s) at this site are subject to this subpart and will comply with all applicable requirements.

5. GENERATOR SPECIFICATIONS

5.1 Source Description

VoltaGrid’s generators are natural gas-fired internal combustion engines which utilize a flame and burning from combustion to convert fuel chemical energy into sensible energy. Through a standard motor, this energy turns into rotary motion and this rotary motion creates usable electrical energy.

VoltaGrid will own and operate the generators to produce electricity for an adjacent facility. The units are also periodically tested for maintenance and readiness checks to meet the federal New Source Performance Standards (NSPS) subpart JJJJ requirements. A process flow diagram for operation of the Facility’s generators is presented in **Figure 1**.

5.1.1 Equipment Description

Performance data for the Generators is provided in **Table 1**.

Table 1: Performance Data

Parameter	Value	Units
One 3310-kWe Generator (Jenbacher J620 Engines)		
100% Capacity Fuel Consumption Rate ¹	24,625	scf/hr
Electrical Generation	3,310	kWe
One 4,810-kWe Generator (Jenbacher J624 Engines)		
100% Capacity Fuel Consumption Rate ¹	37,270	scf/hr
Electrical Generation	4,810	kWe
¹ Based on a natural gas LHV of 1020 BTU/scf.		

5.1.2 Operation Schedule

Table 2 provides the proposed maximum operating schedule.

Table 2: Operating Schedule

Period	Duration
Hours/Day	24
Days/Week	7
Days/Year	365
Weeks/Year	52

5.2 Process Flow Diagram

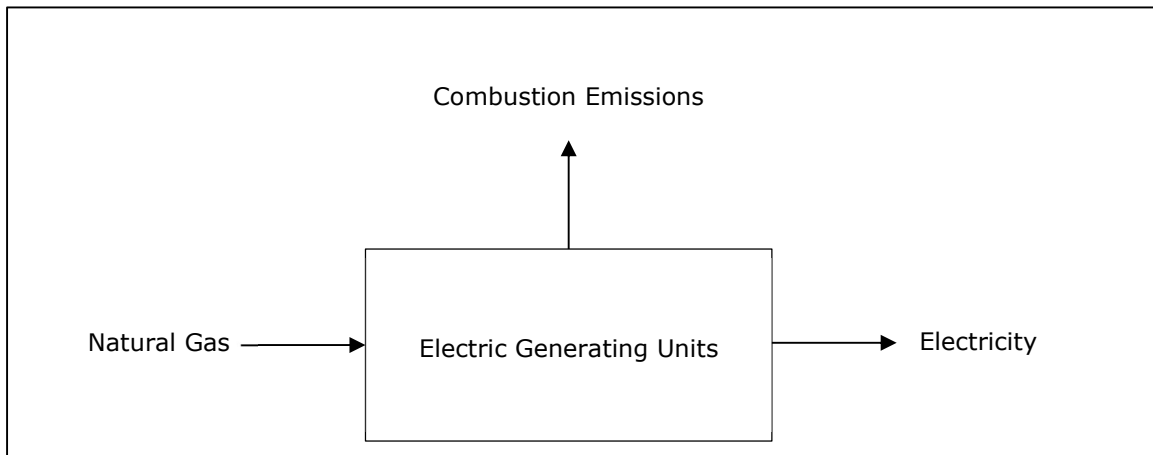


Figure 2: Process Flow Diagram

5.3 Emissions Data and Calculations

5.3.1 Pollutants

The operation of the Generators will result in emissions of criteria pollutants which include NO_x; CO; VOCs; SO₂; PM, including PM₁₀ and PM_{2.5}; and HAPs.

5.3.2 Derivation of Criteria Pollutant Emission Factors

The emissions calculations were performed using "not-to-exceed" emission factors provided by the manufacturer which incorporate guaranteed control efficiencies (98% control for NO_x and 95% control for VOC and CO) (**Appendix A**).

5.3.3 Hazardous Air Pollutants (HAP) Emission Factors

With the exception of formaldehyde, HAP emissions from the generators were estimated using emissions factors from AP-42, Chapter 3.2 and incorporate the manufacturer's guaranteed control efficiency for VOC (i.e., 95% control). Emissions for formaldehyde were estimated using a "not-to-exceed" lb/hr emission factor from the manufacturer. The HAP emission calculations are provided in **Appendix A**.

APPENDIX A

EMISSION CALCULATIONS

Emissions Summary and Permitting Thresholds

Emission Source	VOC (Serious Nonattainment) tpy	NO _x (Serious Nonattainment) tpy	CO (Attainment) tpy	SO ₂ (Attainment) tpy	PM (Attainment) tpy	PM ₁₀ (Attainment) tpy	PM _{2.5} (Attainment) tpy	Formaldehyde tpy	HAPs tpy
J620 EGUs	10.93	13.67	21.86	4.56	9.11	9.11	9.11	7.01	8.70
J624 EGUs	25.05	25.05	39.86	9.11	17.08	17.08	17.08	13.14	16.34
Total	35.99	38.72	61.72	13.67	26.19	26.19	26.19	20.15	25.04
Standard Permit Thresholds (1)	50	50	250	250	250	250	250	250	250
Below threshold?	YES	YES	YES	YES	YES	YES	YES	YES	YES
Title V Threshold	50	50	100	100	100	100	100	10	25
Below threshold?	YES	YES	YES	YES	YES	YES	YES	NO	NO

Notes:

1. [Thresholds: https://www.tceq.texas.gov/downloads/permitting/air/publications/nsr/factsheets/rg-636-factsheet-psd-na.pdf](https://www.tceq.texas.gov/downloads/permitting/air/publications/nsr/factsheets/rg-636-factsheet-psd-na.pdf)

San Antonio is located in an area designated as serious nonattainment for the 2015 8-hour ozone standard. As such, both VOC and NO_x (ozone precursors) are subject to a major source threshold of 50 tons/year.

VoltaGrid Generator Emission Calculations

Engine Model: J620		
EPN:	GEN-1, GEN-2, GEN-3, GEN-4, GEN-5, GEN-6, GEN-7, GEN-8, GEN-9, GEN-10, GEN-11, GEN-12, GEN-13, GEN-14, GEN-15, GEN-16	
Fuel Type:	Natural Gas	
Number of J620 Qpacs:	4	
Number of engines in each Qpac:	4	
Number of Engines/Generators:	16	engines / generators
Engine Power:	4,440	HP
	3,311	kWe
Heat Input per Engine:	25.12	MMBtu/hr
Natural Gas Heating Value:	1020.00	Btu/scf
Natural Gas Input per Engine:	0.02	MMscf/hr
Fuel Consumption:	5,657	BTU/hp-hr
Hours of Operation per Engine:	8760	hr/yr/engine
Total Fuel Usage per Engine:	216	MMscf/yr/engine
Total Fuel Usage for all 16 J620 engines:	3,451	MMscf/yr for all engines

Criteria Pollutant Emission Factors

Pollutant	Emission Factors (1)
VOC	0.156 lb/hr
NO _x	0.195 lb/hr
CO	0.312 lb/hr
PM/PM ₁₀ /PM _{2.5}	0.130 lb/hr
SO ₂	0.065 lb/hr

1. Emissions (lb/hr) based on manufacturer's specifications + 30% safety factor
Safety Factor = 30%

Criteria Pollutant Emissions

Pollutant	Emissions per Engine		Total Emissions	
	lb/hr	tpy	lb/hr	tpy
VOC	0.16	0.68	2.5	10.93
NO _x	0.20	0.85	3.1	13.67
CO	0.31	1.37	5.0	21.86
PM/PM ₁₀ /PM _{2.5}	0.13	0.57	2.1	9.11
SO ₂	0.07	0.28	1.0	4.56

VoltaGrid Generator Emission Calculations
HAP / Toxics Emissions

Pollutant	Emission Factor ⁽¹⁾		Emissions per Engine ⁽²⁾		Total Emissions	
			lb/hr	tpy	lb/hr	tpy
1,1,2,2-Tetrachloroethane	4.00E-05	lb/MMBtu	5.02E-05	2.20E-04	8.04E-04	3.52E-03
1,1,2-Trichloroethane	3.18E-05	lb/MMBtu	3.99E-05	1.75E-04	6.39E-04	2.80E-03
1,3-Butadiene	2.67E-04	lb/MMBtu	3.35E-04	1.47E-03	5.37E-03	2.35E-02
1,3-Dichloropropene	2.64E-05	lb/MMBtu	3.32E-05	1.45E-04	5.30E-04	2.32E-03
2-Methylnaphthalene	3.32E-05	lb/MMBtu	4.17E-05	1.83E-04	6.67E-04	2.92E-03
2,2,4-Trimethylpentane	2.50E-04	lb/MMBtu	3.14E-04	1.38E-03	5.02E-03	2.20E-02
Acenaphthene	1.26E-06	lb/MMBtu	1.58E-06	6.93E-06	2.53E-05	1.11E-04
Acenaphthylene	5.53E-06	lb/MMBtu	6.94E-06	3.04E-05	1.11E-04	4.87E-04
Acetaldehyde	8.36E-03	lb/MMBtu	1.05E-02	4.60E-02	1.68E-01	7.36E-01
Acrolein	5.14E-03	lb/MMBtu	6.46E-03	2.83E-02	1.03E-01	4.52E-01
Benzene	4.40E-04	lb/MMBtu	5.53E-04	2.42E-03	8.84E-03	3.87E-02
Benzo(b)fluoranthene	1.66E-07	lb/MMBtu	2.08E-07	9.13E-07	3.34E-06	1.46E-05
Benzo(e)pyrene	4.15E-07	lb/MMBtu	5.21E-07	2.28E-06	8.34E-06	3.65E-05
Benzo(g,h,i)perylene	4.14E-07	lb/MMBtu	5.20E-07	2.28E-06	8.32E-06	3.64E-05
Biphenyl	2.12E-04	lb/MMBtu	2.66E-04	1.17E-03	4.26E-03	1.87E-02
Carbon Tetrachloride	3.67E-05	lb/MMBtu	4.61E-05	2.02E-04	7.37E-04	3.23E-03
Chlorobenzene	3.05E-05	lb/MMBtu	3.83E-05	1.68E-04	6.13E-04	2.68E-03
Chloroform	2.85E-05	lb/MMBtu	3.58E-05	1.57E-04	5.73E-04	2.51E-03
Chrysene	6.93E-07	lb/MMBtu	8.70E-07	3.81E-06	1.39E-05	6.10E-05
Ethylbenzene	3.97E-05	lb/MMBtu	4.99E-05	2.18E-04	7.98E-04	3.49E-03
Ethylene Dibromide	4.43E-05	lb/MMBtu	5.56E-05	2.44E-04	8.90E-04	3.90E-03
Fluoroanthene	1.11E-06	lb/MMBtu	1.39E-06	6.11E-06	2.23E-05	9.77E-05
Fluorene	5.67E-06	lb/MMBtu	7.12E-06	3.12E-05	1.14E-04	4.99E-04
Formaldehyde	1.00E-01	lb/hr ⁽³⁾	1.00E-01	4.38E-01	1.60E+00	7.01E+00
Methanol	2.50E-03	lb/MMBtu	3.14E-03	1.38E-02	5.02E-02	2.20E-01
Methylene Chloride	2.00E-05	lb/MMBtu	2.51E-05	1.10E-04	4.02E-04	1.76E-03
n-Hexane	1.11E-03	lb/MMBtu	1.39E-03	6.11E-03	2.23E-02	9.77E-02
Naphthalene	7.44E-05	lb/MMBtu	9.34E-05	4.09E-04	1.49E-03	6.55E-03
PAH	2.69E-05	lb/MMBtu	3.38E-05	1.48E-04	5.41E-04	2.37E-03
Phenanthrene	1.04E-05	lb/MMBtu	1.31E-05	5.72E-05	2.09E-04	9.15E-04
Phenol	2.40E-05	lb/MMBtu	3.01E-05	1.32E-04	4.82E-04	2.11E-03
Pyrene	1.36E-06	lb/MMBtu	1.71E-06	7.48E-06	2.73E-05	1.20E-04
Styrene	2.36E-05	lb/MMBtu	2.96E-05	1.30E-04	4.74E-04	2.08E-03
Tetrachlorethane	2.48E-06	lb/MMBtu	3.11E-06	1.36E-05	4.98E-05	2.18E-04
Toluene	4.08E-04	lb/MMBtu	5.12E-04	2.24E-03	8.20E-03	3.59E-02
Vinyl Chloride	1.49E-05	lb/MMBtu	1.87E-05	8.20E-05	2.99E-04	1.31E-03
Xylenes	1.84E-05	lb/MMBtu	2.31E-05	1.01E-04	3.70E-04	1.62E-03
TOTAL			0.12	0.54	1.99	8.70

Notes:

1. Emissions of toxics and HAPs are based on emission factors in AP-42 Chapter 3.2-2.
2. The oxidation catalyst provides for control of organic HAPs and toxics:
Control efficiency = 95%
3. Manufacturer-provided emission factor for formaldehyde includes 95% control efficiency.

VoltaGrid Generator Emission Calculations

Engine Model: J624		
EPN:	GEN-17, GEN-18, GEN-19, GEN-20, GEN-21, GEN-22, GEN-23, GEN-24, GEN-25, GEN-26, GEN-27, GEN-28, GEN-29, GEN-30, GEN-31, GEN-32, GEN-33, GEN-34, GEN-35, GEN-36	
Fuel Type:	Natural Gas	
Number of J624 Qpacs:	4	
Number of engines in each Qpac:	5	
Number of Engines/Generators:	20	engines / generators
Engine Power:	6,450	HP
	4,810	kWe
Heat Input per Engine:	38.02	MMBtu/hr
Natural Gas Heating Value:	1020.00	Btu/scf
Natural Gas Input per Engine:	0.037	MMscf/hr
Fuel Consumption:	5,894	BTU/hp-hr
Hours of Operation per Engine:	8760	hr/yr/engine
Total Fuel Usage per Engine:	326	MMscf/yr/engine
Total Fuel Usage for all 20 J620 engines:	6,530	MMscf/yr for all engines

Criteria Pollutant Emission Factors

Pollutant	Emission Factors (1)	
VOC	0.286	lb/hr
NO _x	0.286	lb/hr
CO	0.455	lb/hr
PM/PM ₁₀ /PM _{2.5}	0.195	lb/hr
SO ₂	0.104	lb/hr

1. Emissions (lb/hr) based on manufacturer's specifications + 30% safety factor
Safety Factor = 30%

Criteria Pollutant Emissions

Pollutant	Emissions per Engine		Total Emissions	
	lb/hr	tpy	lb/hr	tpy
VOC	0.29	1.25	5.7	25.05
NO _x	0.29	1.25	5.7	25.05
CO	0.46	1.99	9.1	39.86
PM/PM ₁₀ /PM _{2.5}	0.20	0.85	3.9	17.08
SO ₂	0.10	0.46	2.1	9.11

VoltaGrid Generator Emission Calculations
HAP / Toxics Emissions

Pollutant	Emission Factor ⁽¹⁾		Emissions per Engine ⁽²⁾		Total Emissions	
			lb/hr	tpy	lb/hr	tpy
1,1,2,2-Tetrachloroethane	4.00E-05	lb/MMBtu	7.60E-05	3.33E-04	1.52E-03	6.66E-03
1,1,2-Trichloroethane	3.18E-05	lb/MMBtu	6.04E-05	2.65E-04	1.21E-03	5.30E-03
1,3-Butadiene	2.67E-04	lb/MMBtu	5.08E-04	2.22E-03	1.02E-02	4.45E-02
1,3-Dichloropropene	2.64E-05	lb/MMBtu	5.02E-05	2.20E-04	1.00E-03	4.40E-03
2-Methylnaphthalene	3.32E-05	lb/MMBtu	6.31E-05	2.76E-04	1.26E-03	5.53E-03
2,2,4-Trimethylpentane	2.50E-04	lb/MMBtu	4.75E-04	2.08E-03	9.50E-03	4.16E-02
Acenaphthene	1.26E-06	lb/MMBtu	2.40E-06	1.05E-05	4.79E-05	2.10E-04
Acenaphthylene	5.53E-06	lb/MMBtu	1.05E-05	4.60E-05	2.10E-04	9.21E-04
Acetaldehyde	8.36E-03	lb/MMBtu	1.59E-02	6.96E-02	3.18E-01	1.39E+00
Acrolein	5.14E-03	lb/MMBtu	9.77E-03	4.28E-02	1.95E-01	8.56E-01
Benzene	4.40E-04	lb/MMBtu	8.36E-04	3.66E-03	1.67E-02	7.33E-02
Benzo(b)fluoranthene	1.66E-07	lb/MMBtu	3.16E-07	1.38E-06	6.31E-06	2.76E-05
Benzo(e)pyrene	4.15E-07	lb/MMBtu	7.89E-07	3.46E-06	1.58E-05	6.91E-05
Benzo(g,h,i)perylene	4.14E-07	lb/MMBtu	7.87E-07	3.45E-06	1.57E-05	6.89E-05
Biphenyl	2.12E-04	lb/MMBtu	4.03E-04	1.77E-03	8.06E-03	3.53E-02
Carbon Tetrachloride	3.67E-05	lb/MMBtu	6.98E-05	3.06E-04	1.40E-03	6.11E-03
Chlorobenzene	3.05E-05	lb/MMBtu	5.80E-05	2.54E-04	1.16E-03	5.08E-03
Chloroform	2.85E-05	lb/MMBtu	5.42E-05	2.37E-04	1.08E-03	4.75E-03
Chrysene	6.93E-07	lb/MMBtu	1.32E-06	5.77E-06	2.63E-05	1.15E-04
Ethylbenzene	3.97E-05	lb/MMBtu	7.55E-05	3.31E-04	1.51E-03	6.61E-03
Ethylene Dibromide	4.43E-05	lb/MMBtu	8.42E-05	3.69E-04	1.68E-03	7.38E-03
Fluoroanthene	1.11E-06	lb/MMBtu	2.11E-06	9.24E-06	4.22E-05	1.85E-04
Fluorene	5.67E-06	lb/MMBtu	1.08E-05	4.72E-05	2.16E-04	9.44E-04
Formaldehyde	1.50E-01	lb/hr ⁽³⁾	1.50E-01	6.57E-01	3.00E+00	1.31E+01
Methanol	2.50E-03	lb/MMBtu	4.75E-03	2.08E-02	9.50E-02	4.16E-01
Methylene Chloride	2.00E-05	lb/MMBtu	3.80E-05	1.67E-04	7.60E-04	3.33E-03
n-Hexane	1.11E-03	lb/MMBtu	2.11E-03	9.24E-03	4.22E-02	1.85E-01
Naphthalene	7.44E-05	lb/MMBtu	1.41E-04	6.19E-04	2.83E-03	1.24E-02
PAH	2.69E-05	lb/MMBtu	5.11E-05	2.24E-04	1.02E-03	4.48E-03
Phenanthrene	1.04E-05	lb/MMBtu	1.98E-05	8.66E-05	3.95E-04	1.73E-03
Phenol	2.40E-05	lb/MMBtu	4.56E-05	2.00E-04	9.12E-04	4.00E-03
Pyrene	1.36E-06	lb/MMBtu	2.59E-06	1.13E-05	5.17E-05	2.26E-04
Styrene	2.36E-05	lb/MMBtu	4.49E-05	1.96E-04	8.97E-04	3.93E-03
Tetrachlorethane	2.48E-06	lb/MMBtu	4.71E-06	2.06E-05	9.43E-05	4.13E-04
Toluene	4.08E-04	lb/MMBtu	7.76E-04	3.40E-03	1.55E-02	6.79E-02
Vinyl Chloride	1.49E-05	lb/MMBtu	2.83E-05	1.24E-04	5.66E-04	2.48E-03
Xylenes	1.84E-05	lb/MMBtu	3.50E-05	1.53E-04	6.99E-04	3.06E-03
TOTAL			0.19	0.82	3.73	16.34

Notes:

1. Emissions of toxics and HAPs are based on emission factors in AP-42 Chapter 3.2-2.
2. The oxidation catalyst provides for control of organic HAPs and toxics:
Control efficiency = 95%
3. Manufacturer-provided emission factor for formaldehyde includes 95% control efficiency.



VoltaGrid Generator Emission Reference

Generator Model

J620-J785 engines, operated at 3223 kWe at 1900 ft above sea level

INNIO Jenbacher confirms that the pollutants, in the amounts listed below, are confirmed as valid "NOT TO EXCEED" values, for stationary applications per engine for the:

24-Jul-25

VoltaGrid QPAC project, J620-J785 engines, operated at 3223 kWe at 1900 ft above sea level / 115°F (T0)

<u>Pollutant</u>	<u>Vendor Guaranteed Emissions (lb/hr)</u>	<u>Vendor Guaranteed Emissions (lb/hr)</u>
NOX	0.15	0.195
CO	0.24	0.312
VOC (as NMNEHC, expressed as C)	0.12	0.156
CH2O	0.1	0.13
PM2.5	0.1	0.13
PM10	0.1	0.13
SO2	0.05	0.065

Compliance Safety Margin = 30%

Generator Model

J624-L3785 4,8 MWe engine at 1900 ft above sea level

INNIO Jenbacher confirms that the pollutants, in the amounts listed below, are confirmed as valid "NOT TO EXCEED" values, for stationary applications per engine for the:

24-Jul-25

VoltaGrid QPAC project, J624-L3785 4,8 MWe engine at 1900 ft above sea level / 115°F (T0)

<u>Pollutant</u>	<u>Vendor Guaranteed Emissions (lb/hr)</u>	<u>Vendor Guaranteed Emissions (lb/hr)</u>
NOx	0.22	0.286
CO	0.35	0.455
VOC (as NMNEHC, expressed as C)	0.22	0.286
CH2O	0.15	0.195
PM2.5 / PM10	0.15	0.195
SO2	0.08	0.104

Compliance Safety Margin = 30%

APPENDIX B

GENERATOR VENDOR DATA

July 24, 2025

INNIO Jenbacher confirms that the pollutants, in the amounts listed below, are confirmed as valid "NOT TO EXCEED" values, for stationary applications per engine for the:

VoltaGrid QPAC project, J620-J785 engines, operated at 3223 kWe at 1900 ft above sea level / 115°F (T0)

Emission values (as half hour average values) *):

Pollutant	lb/hr	tpy (8760 h base)
NOX	0.15	0.68
CO	0.24	1.06
VOC (as NMNEHC, expressed as C)	0.12	0.53
CH ₂ O	0.1	0.44
PM _{2.5}	0.1	0.44
PM ₁₀	0.1	0.44
SO ₂ **)	0.05	0.22

Pollutant	Testing by
NO _x	EPA method 7E, or EN 14792 (CLD)
CO	EPA method 10, or DIN EN 15058 (NDIR)
VOC (NMNEHC)	Evaluated using single determination of C _x H _y from dry exhaust gas with GC-WLD or GC-FID. Every component must be calibrated. Collective test over 30 minutes or the average of 10 single measurements within 30 minutes
CH ₂ O	VDI3862-Page 2 (AHMT), or 4 (DNPH), or 8 (FTIR) or equivalent US measurement method, e.g. FTIR according EPA method 320
PM _{2.5} / PM ₁₀	EN-13284-1
SO ₂ **)	Wet sampling and ion-chromatography variant according ISO11632 or DIN EN 14791

*) Emission values account no measurement tolerances.

**) No guarantee as main impacting factor is typically the Sulphur content of the fuel. Lubrication oil Sulphur is a minor factor and depends on brand and type.

Definitions:

NO_x as NO₂

NMNEHC Non-Methane-Non-Ethane-Hydrocarbons (only C_xH_y species with x>2 + C₂H₄), calculated as C

CH₂O Formaldehyde

The following criteria apply for demonstration purposes:

- 1) Operation will be on Combustion Air and Natural Gas, which must meet the INNIO Jenbacher gas quality requirements stated in the Technical Instruction 1000-0300.
- 2) Emission values are based on the fuel gas analysis (Appendix I).
- 3) Based on the nominal mass flow provided by the project specific data sheets.
- 4) For operation between 85% and 100% stable load (not for transient load events in Island mode).

- 5) The emission values apply after the ATS has reached the specified functional temperature, the reductant dosing release was given, and the Emissions Controller has balanced all actuators to the target value.
- 6) To manage the drift in emission quality of the engine, resulting from an expected upward drift coming from fuel or oil deposits build up in the engine, VoltaGrid shall regularly monitor and control emissions.
- 7) VoltaGrid shall manage this drift through regular maintenance and repair schedules along with the use of genuine INNIO Jenbacher parts and components.
- 8) NOx drift can be compensated to a certain extent by calibration of engine operating parameters in the DIA.NE XT controls system by specially trained qualified personnel.
- 9) Excessive deposits resulting from gas or oil related contamination may require the cleaning of the combustion chamber, turbochargers and aftertreatment system.
- 10) Maintenance and component repairs for the INNIO Jenbacher Gas Engines and ATS equipment is carried out by qualified personnel strictly according to the schedule and repair requirements set by INNIO Jenbacher along with the use of genuine INNIO Jenbacher parts and components.
- 11) Testing to determine compliance with this commitment will be at the expense of the customer and accomplished by a certified laboratory chosen by the customer. The engine/installation is to be in good working order consistent with INNIO Jenbacher recommended maintenance practices prior to any testing. INNIO Jenbacher reserves the right to participate and/or challenge the results of any testing.

If the engine fails to meet the emissions representations the customer must provide the following supporting documentation to INNIO Jenbacher:

- 1) Fuel gas samples
- 2) Complete maintenance records
- 3) A full report including the calculations and results of any emissions testing.

INNIO Jenbacher will be given a reasonable amount of time to take any or all of the following actions:

- Perform additional testing in an effort demonstrate the emissions representations. If this testing demonstrates compliance with no adjustments required to the engine, customer will pay for added testing. If testing fails to demonstrate compliance with the emissions representations, the testing will be paid for by INNIO Jenbacher.
- Make such adjustments to the engine so as to bring the engine into compliance with the emissions limits provided in this letter.

Declaration (acc. ISO/IEC 17050-1:2004)

We hereby confirm that stationary Jenbacher Gas Engines are labelled as follows:

“THIS ENGINE IS EXCLUDED FROM THE REQUIREMENT OF 40 CFR PART 1048 AS A “STATIONARY ENGINE”. INSTALLING OR USING THIS ENGINE IN ANY OTHER APPLICATION MAY BE A VIOLATION OF FEDERAL LAW SUBJECTED TO CIVIL PENALTY AND THE OWNER/OPERATOR MUST COMPLY WITH THE REQUIREMENT OF CFR PART 60. THIS ENGINE IS NOT PART OF A REQUIRED OR VOLUNTARY CERTIFICATION PROGRAM AND IS CLASSIFIED AS NON-CERTIFIED PER 40 CFR PART 60, SUBPART JJJJ”.

INNIO Jenbacher GmbH & Co OG
Achenseestrasse 1-3
6020 Jenbach

Released by: Martin Widner

Appendix I (Binding fuel gas composition used for emissions prediction):
Natural Gas: Analysis RBX Oasis Waha Delivery, July 2025

Component	Vol% or Mol%
Methane (CH ₄)	95.340
Ethane (C ₂ H ₆)	3.370
Propane (C ₃ H ₈)	0.159
Iso-Butane (C ₄ H ₁₀)	0.010
n-Butane (C ₄ H ₁₀)	0.017
Iso-Pentane (C ₅ H ₁₂)	0.003
n-Pentane (C ₅ H ₁₂)	0.003
C ₆ +	0.002
CO ₂	0.004
N ₂	1.093
Sulfur	not detectable

24/07/2025

INNIO Jenbacher confirms that the pollutants, in the amounts listed below, are confirmed as valid "NOT TO EXCEED" values, for stationary applications per engine for the:

VoltaGrid QPAC project, J624-L3785 4,8 MWe engine at 1900 ft above sea level / 115°F (T0)

Emission values (as half hour average values) *):

Pollutant	lb/hr	tpy (base 8760 oph/y)
NOx	0.22	0.97
CO	0.35	1.49
VOC (as NMNEHC, expressed as C)	0.22	0.97
CH ₂ O	0.15	0.66
PM _{2.5} / PM ₁₀	0.15	0.66
SO ₂ **)	0.08	0.35

Pollutant	Testing by
NOx	EPA method 7E, or EN 14792 (CLD)
CO	EPA method 10, or DIN EN 15058 (NDIR)
VOC (NMNEHC)	Evaluated using single determination of C _x H _y from dry exhaust gas with GC-WLD or GC-FID. Every component must be calibrated. Collective test over 30 minutes or the average of 10 single measurements within 30 minutes
CH ₂ O	VDI3862-Page 2 (AHMT), or 4 (DNPH), or 8 (FTIR) or equivalent US measurement method, e.g. FTIR according EPA method 320
PM _{2.5} / PM ₁₀	EN-13284-1
SO ₂ **)	Wet sampling and ion-chromatography variant according ISO11632 or DIN EN 14791

*) Emission values account no measurement tolerances.

**) No guarantee as main impacting factor is typically the Sulphur content of the fuel. Lubrication oil Sulphur is a minor factor and depends on brand and type.

Definitions:

NOx as NO₂

NMNEHC Non-Methane-Non-Ethane-Hydrocarbons (only C_xH_y species with x>2 + C₂H₄), calculated as C

CH₂O Formaldehyde

The following criteria apply for demonstration purposes:

- 1) Operation will be on Combustion Air and Natural Gas which must meet the INNIO Jenbacher gas quality requirements stated in the Technical Instruction 1000-0300.
- 2) Emission values are based on the fuel gas analysis (Appendix I).
- 3) Based on the nominal mass flow provided by the project specific data sheets.
- 4) For operation between 85% and 100% stable load (not for transient load events in Island mode).
- 5) The emission values apply after the ATS has reached the specified functional temperature, the reductant dosing release was given, and the Emissions Controller has balanced all actuators to the target value.

- 6) To manage the drift in emission quality of the engine, resulting from an expected upward drift coming from fuel or oil deposits build up in the engine, VoltaGrid shall regularly monitor and control emissions.
- 7) VoltaGrid shall manage this drift through regular maintenance and repair schedules along with the use of genuine INNIO Jenbacher parts and components.
- 8) NOx drift can be compensated up to a certain extent, by calibration of engine operating parameters in the DIA.NE XT controls system by specially trained qualified personnel.
- 9) Excessive deposits resulting from gas or oil related contamination may require the cleaning of the combustion chamber, turbochargers and aftertreatment system.
- 10) Maintenance and component repairs for the INNIO Jenbacher Gas Engines and ATS equipment is carried out by qualified personnel strictly according to the schedule and repair requirements set by INNIO Jenbacher along with the use of genuine INNIO Jenbacher parts and components.
- 11) Testing to determine compliance with this commitment will be at the expense of the customer and accomplished by a certified laboratory chosen by the customer. The engine/installation is to be in good working order consistent with INNIO Jenbacher recommended maintenance practices prior to any testing. INNIO Jenbacher reserves the right to participate and/or challenge the results of any testing.

If the engine fails to meet the emissions representations the customer must provide the following supporting documentation to INNIO Jenbacher:

- 1) Fuel gas samples
- 2) Complete maintenance records
- 3) A full report including the calculations and results of any emissions testing.

INNIO Jenbacher will be given a reasonable amount of time to take any or all of the following actions:

- Perform additional testing in an effort demonstrate the emissions representations. If this testing demonstrates compliance with no adjustments required to the engine, customer will pay for added testing. If testing fails to demonstrate compliance with the emissions representations, the testing will be paid for by INNIO Jenbacher.
- Make such adjustments to the engine so as to bring the engine into compliance with the emissions limits provided in this letter.

Declaration (acc. ISO/IEC 17050-1:2004)

We hereby confirm that stationary Jenbacher Gas Engines are labelled as follows:

“THIS ENGINE IS EXCLUDED FROM THE REQUIREMENT OF 40 CFR PART 1048 AS A “STATIONARY ENGINE”. INSTALLING OR USING THIS ENGINE IN ANY OTHER APPLICATION MAY BE A VIOLATION OF FEDERAL LAW SUBJECT TO CIVIL PENALTY AND THE OWNER/OPERATOR MUST COMPLY WITH THE REQUIREMENT OF CFR PART 60. THIS ENGINE IS NOT PART OF A REQUIRED OR VOLUNTARY CERTIFICATION PROGRAM AND IS CLASSIFIED AS NON-CERTIFIED PER 40 CFR PART 60, SUBPART JJJJ”.

INNIO Jenbacher GmbH & Co OG
Achenseestrasse 1-3
6020 Jenbach

Released by: Martin Widner

Appendix I (Binding fuel gas composition used for emissions prediction):
Natural Gas: Analysis RBX Oasis Waha Delivery, July 2025

Component	Vol% or Mol%
Methane (CH ₄)	95.340
Ethane (C ₂ H ₆)	3.370
Propane (C ₃ H ₈)	0.159
Iso-Butane (C ₄ H ₁₀)	0.010
n-Butane (C ₄ H ₁₀)	0.017
Iso-Pentane (C ₅ H ₁₂)	0.003
n-Pentane (C ₅ H ₁₂)	0.003
C ₆ +	0.002
CO ₂	0.004
N ₂	1.093
Sulfur	not detectable

APPENDIX C

TABLE 1(A)



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Table 1(a) Emission Point Summary

Date:	September 2025	Permit No.:	TBD	Regulated Entity No.:	TBD
Area Name:	VoltaGrid SAT-2 EGU			Customer Reference No.:	CN606076008

AIR CONTAMINANT DATA					
1. Emission Point			2. Component or Air Contaminant Name	3. Air Contaminant Emission Rate	
(A) EPN	(B) FIN	(C) NAME		(A) LB/HR	(B) TPY
GEN-1, GEN-2, GEN-3, GEN-4, GEN-5, GEN-6, GEN-7, GEN-8, GEN-9, GEN-10, GEN-11, GEN-12, GEN-13, GEN-14, GEN-15, GEN-16, GEN-17, GEN-18, GEN-19, GEN-20, GEN-21, GEN-22, GEN-23, GEN-24, GEN-25, GEN-26, GEN-27, GEN-28, GEN-29, GEN-30, GEN-31, GEN-32, GEN-33, GEN-34, GEN-35, GEN-36	GEN-1, GEN-2, GEN-3, GEN-4, GEN-5, GEN-6, GEN-7, GEN-8, GEN-9, GEN-10, GEN-11, GEN-12, GEN-13, GEN-14, GEN-15, GEN-16, GEN-17, GEN-18, GEN-19, GEN-20, GEN-21, GEN-22, GEN-23, GEN-24, GEN-25, GEN-26, GEN-27, GEN-28, GEN-29, GEN-30, GEN-31, GEN-32, GEN-33, GEN-34, GEN-35, GEN-36	Electric Generating Units	VOC	8.22	35.99
			NO _x	8.84	38.72
			CO	14.09	61.72
			PM	5.98	26.19
			PM ₁₀	5.98	26.19
			PM _{2.5}	5.98	26.19
			SO ₂	3.12	13.67

EPN = Emission Point Number

FIN = Facility Identification Number

APPENDIX D

CORE DATA FORM



TCEQ Core Data Form

For detailed instructions on completing this form, please read the Core Data Form Instructions or call 512-239-5175.

SECTION I: General Information

1. Reason for Submission (If other is checked please describe in space provided.)		
☒ New Permit, Registration or Authorization (Core Data Form should be submitted with the program application.)		
☐ Renewal (Core Data Form should be submitted with the renewal form)	☐ Other	
2. Customer Reference Number (if issued)	Follow this link to search for CN or RN numbers in Central Registry**	3. Regulated Entity Reference Number (if issued)
CN 606076008		RN

SECTION II: Customer Information

4. General Customer Information		5. Effective Date for Customer Information Updates (mm/dd/yyyy)			
☐ New Customer ☒ Update to Customer Information ☐ Change in Regulated Entity Ownership					
☐ Change in Legal Name (Verifiable with the Texas Secretary of State or Texas Comptroller of Public Accounts)					
<i>The Customer Name submitted here may be updated automatically based on what is current and active with the Texas Secretary of State (SOS) or Texas Comptroller of Public Accounts (CPA).</i>					
6. Customer Legal Name (If an individual, print last name first: eg: Doe, John)				<i>If new Customer, enter previous Customer below:</i>	
VoltaGrid LLC					
7. TX SOS/CPA Filing Number		8. TX State Tax ID (11 digits)		9. Federal Tax ID (9 digits)	
				10. DUNS Number (if applicable)	
11. Type of Customer:		☒ Corporation		☐ Individual	
Government: ☐ City ☐ County ☐ Federal ☐ Local ☐ State ☐ Other		☐ Sole Proprietorship		Partnership: ☐ General ☐ Limited	
12. Number of Employees				13. Independently Owned and Operated?	
☐ 0-20 ☐ 21-100 ☐ 101-250 ☐ 251-500 ☒ 501 and higher				☐ Yes ☐ No	
14. Customer Role (Proposed or Actual) – as it relates to the Regulated Entity listed on this form. Please check one of the following					
☐ Owner ☐ Operator ☒ Owner & Operator ☐ Other:					
☐ Occupational Licensee ☐ Responsible Party ☐ VCP/BSA Applicant					
15. Mailing Address:		10800 Telge Road			
City		Houston		State	TX
ZIP		77095		ZIP + 4	
16. Country Mailing Information (if outside USA)				17. E-Mail Address (if applicable)	
				Korby.Bracken@VoltaGrid.com	

18. Telephone Number	19. Extension or Code	20. Fax Number (if applicable)
(307) 630-1430		() -

SECTION III: Regulated Entity Information

21. General Regulated Entity Information (If 'New Regulated Entity' is selected, a new permit application is also required.)								
☒ New Regulated Entity ☐ Update to Regulated Entity Name ☐ Update to Regulated Entity Information								
<i>The Regulated Entity Name submitted may be updated, in order to meet TCEQ Core Data Standards (removal of organizational endings such as Inc, LP, or LLC).</i>								
22. Regulated Entity Name (Enter name of the site where the regulated action is taking place.)								
VoltaGrid SAT-2 EGU								
23. Street Address of the Regulated Entity: (No PO Boxes)	5207 Rogers Road, Suite#2							
	City	San Antonio	State	TX	ZIP	78251	ZIP + 4	
24. County	Bexar							

If no Street Address is provided, fields 25-28 are required.

25. Description to Physical Location:	N/A							
26. Nearest City					State	Nearest ZIP Code		
N/A								
<i>Latitude/Longitude are required and may be added/updated to meet TCEQ Core Data Standards. (Geocoding of the Physical Address may be used to supply coordinates where none have been provided or to gain accuracy).</i>								
27. Latitude (N) In Decimal:		29.477227			28. Longitude (W) In Decimal:		-98.694727	
Degrees	Minutes	Seconds	Degrees	Minutes	Seconds			
N/A	N/A	N/A	N/A	N/A	N/A			
29. Primary SIC Code (4 digits)	30. Secondary SIC Code (4 digits)		31. Primary NAICS Code (5 or 6 digits)		32. Secondary NAICS Code (5 or 6 digits)			
4911			221112					
33. What is the Primary Business of this entity? (Do not repeat the SIC or NAICS description.)								
Provide power to a nearby data ctr								
34. Mailing Address:	10800 Telge Road							
	City	Houston	State	TX	ZIP	77095	ZIP + 4	
35. E-Mail Address:	Korby.Bracken@VoltaGrid.com							
36. Telephone Number	37. Extension or Code		38. Fax Number (if applicable)					
(307) 630-1430			() -					

39. TCEQ Programs and ID Numbers Check all Programs and write in the permits/registration numbers that will be affected by the updates submitted on this form. See the Core Data Form instructions for additional guidance.

☐ Dam Safety	☐ Districts	☐ Edwards Aquifer	☐ Emissions Inventory Air	☐ Industrial Hazardous Waste
☐ Municipal Solid Waste	☒ New Source Review Air	☐ OSSF	☐ Petroleum Storage Tank	☐ PWS
☐ Sludge	☐ Storm Water	☐ Title V Air	☐ Tires	☐ Used Oil
☐ Voluntary Cleanup	☐ Wastewater	☐ Wastewater Agriculture	☐ Water Rights	☒ Other:
				Tier II

SECTION IV: Preparer Information

40. Name:	Sim Deshpande		41. Title:	Senior Managing Consultant
42. Telephone Number	43. Ext./Code	44. Fax Number	45. E-Mail Address	
(978) 449-0304		() -	sdeshpande@ramboll.com	

SECTION V: Authorized Signature

46. By my signature below, I certify, to the best of my knowledge, that the information provided in this form is true and complete, and that I have signature authority to submit this form on behalf of the entity specified in Section II, Field 6 and/or as required for the updates to the ID numbers identified in field 39.

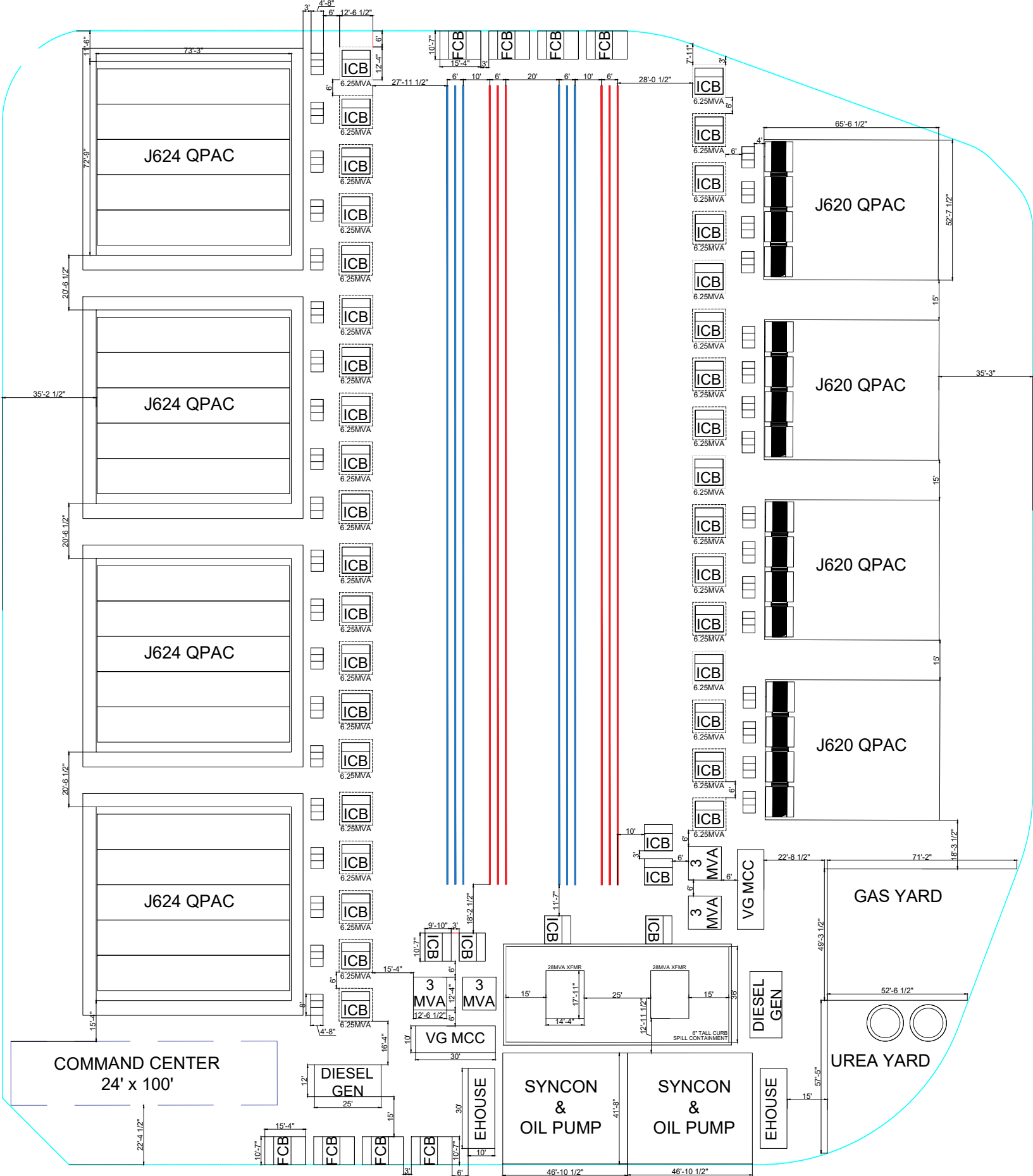
Company:	VoltaGrid LLC		Job Title:	Senior Director, HSE	
Name (In Print):	Korby Bracken			Phone:	(307) 630- 1430
Signature:				Date:	

APPENDIX E

SITE PLAN / GENERAL LAYOUT

7
6
5
4
3
2
1

PRELIMINARY FOR
REVIEW ONLY



PENDING CFD REVIEW

1
CONFIDENTIAL: THE INFORMATION CONTAINED HEREIN IS THE PROPRIETARY DATA OF VOLTAGRID LLC AND IS NOT FOR THE DISSEMINATION OR DISCLOSURE, IN WHOLE OR PART FOR ANY PURPOSE OTHER THAN THAT FOR WHICH IT IS SUBMITTED EXCEPT AS AUTHORIZED IN WRITING BY VOLTAGRID LLC



TITLE :
SITE LAYOUT

1	09/04/2025	FOR APPROVAL	PETER N.	CAM G.	ACHAL S.
NO.	DATE	REVISION DESCRIPTION	DRAWN	CHECK	APPR

PROJECT NAME/NUMBER:
VANTAGE DATA CENTER - TX2
DRAWING NO.:
VG25-P-EL-VDCTX2-SLT-P01-01

SCALE: NONE
REV.: 1
NUMBER OF SHEET: 01 OF 01

7
6
5
4
3
2
1