



Air Quality Operating Permit Application Form

Lincoln-Lancaster County Health Department

Environmental Public Health Division - Air Quality Program

Lincoln, NE 68510

ph: (402) 441-8040

fax: (402) 441-3890

<http://www.lincoln.ne.gov/city/health/environ/air.htm>

Purpose of Application:

☐ Initial Operating Permit

☐ Operating Permit Modification

☒ Operating Permit Renewal

☐ Revise Previously Submitted Application

SECTION 1: ADMINISTRATIVE INFORMATION AND RESPONSIBLE OFFICIAL CERTIFICATION

Part A: Company Information

Company Name:	Lincoln Electric System				
Company Address:	9445 Rokeby Road				
Company City:	Lincoln	Company State:	Nebraska	Company ZIP:	68526
Is the business incorporated?	☐ Yes ☒ No				

Part B: General Facility Information

Facility Name:	Terry Bundy Generating Station				
LLCHD Facility ID #:	00240				
Facility Physical Address:	7707 Bluff Road				
Facility City:	Lincoln	Facility State:	Nebraska	Facility ZIP:	68517
Facility NAICS Code(s):	221112	Fossil Fuel Electric Power Generation			
Is the facility located within 50 miles of another state?	☒ Yes ☐ No	If so, which state(s)?	☒ Iowa ☐ Kansas ☐ Missouri		
Is the facility located on leased property?	☐ Yes ☒ No				

Part C: Contact Information

Facility Contact Person:	Dalton Johnson				
Facility Contact Person Title or Responsibility:	Environmental Supervisor				
Phone Number:	(402) 473-3429	E-Mail:	djohnson@les.com		
Alternate Phone Number: (optional)		Fax Number: (optional)			
Who is the primary contact for questions regarding this application?	☒ Facility Contact Person ☐ Other				

SECTION 1: ADMINISTRATIVE INFORMATION AND RESPONSIBLE OFFICIAL CERTIFICATION

Part D: Permit Information

Does this facility currently hold an operating permit issued by the LLCHD?		☒ Yes	☐ No
If so, what type of operating permit does the facility hold?	☒ Class I (Title V) - Major Source	☐ Class II - Minor Source	
	☐ Class II - Synthetic Minor Source		
What is the expiration date of the operating permit you currently hold?		1/1/2019	
Does this facility currently hold one or more construction permits issued by the LLCHD?		☒ Yes	☐ No
If so, list the numbers for all currently effective construction permits. Do not include superceded permits.	109d	152	
If you know what type of permit you are applying for, check the appropriate box:	☒ Class I (Title V) - Major Source	☐ Class II - Minor Source	
	☐ Class II - Synthetic Minor Source	☐ I do not know permit type.	

Part E: Responsible Official Certification

Compliance Certification ☒ Agree ☐ Disagree	I hereby certify that, based on information and belief formed after reasonable inquiry, the facility that emits air pollutants, which is identified in this application and that is subject to the applicable requirements identified in Section 9: 1. Is in compliance with all applicable requirements, except as described in Section 9; 2. Will continue to comply with all applicable requirements for which compliance has been achieved; and, 3. Will comply with all applicable requirements for which compliance is not currently achieved
Truth and Accuracy Certification ☒ Agree ☐ Disagree	I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in this Air Quality Operating Permit application are true, complete, and accurate. I certify that all hard copies of this application are identical in content.
Electronic Copy Certification ☒ Agree ☐ Disagree ☐ Not Applicable	I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in the electronic copy of the Air Quality Operating Permit application are identical in content to the hard copy submittal.
Citizenship Attestation ☒ Agree ☐ Disagree	For the purpose of complying with Neb. Rev. Stat. §§4-108 through 4-114, I attest as follows (<u>check one</u>): ☒ I am a citizen of the United States. OR ☐ I am a qualified alien under the federal Immigration and Nationality Act, and will provide my immigration status, alien number, and USCIS documentation upon request. I hereby attest that my responses and the information provided on this form and any related application for public benefits are true, complete, and accurate, and I understand that this information may be used to verify my lawful presence in the United States.
Responsible Official Name: (printed or typed)	Jason Fortik
Responsible Official Title:	Vice President, Power Supply
Responsible Official Signature:	
Date:	9/1/2026



Air Quality Operating Permit Application Form
Lincoln-Lancaster County Health Department
Air Quality Program

SECTION 2: DETAILED SOURCE INFORMATION

Part A: Operating Schedule

Is this source operated seasonally, or year-round?	☐ Seasonal	☒ Year-Round	
☐	☐	☐	☐
☐	☐	☐	☐
Provide the normal operating schedule:	Hours per Day:	24	
	Days per Week:	7	
	Weeks per Year:	52	
Does the source operate under an alternative schedule on a regular basis?	☐ Yes	☒ No	

Part B: Facility Description

On separate sheet(s) of paper, provide a detailed narrative description of the facility. Explain the stages in each process that may result in the discharge of an air pollutant. Include all emission points, emission units, pollution control equipment, and identification numbers. The narrative should complement the facility layout and process flow diagrams.

Is a Facility Description attached to your application?	☒ Yes	
	☐ No	

Part C: Facility Layout Diagram

On a separate sheet(s) of paper, provide a detailed diagram or site drawing that includes all buildings, stacks, emission points and units, control equipment, tanks, etc. identified in this application. Make sure all elements in the drawing are properly identified, drawn to scale, and consistent with other sections of this application. The facility diagram should show the location of all buildings, structures, stacks, and property boundaries. Fences or other public access restrictions should be shown or identified and described. Be sure to identify adjacent roads and include a north arrow. Include an effective date for the diagram.

Is a Facility Layout Diagram included with your application?	☒ Yes	
	☐ No	

Part D: Process Flow Diagram

On separate sheet(s) of paper, provide a detailed narrative description of the facility. Explain the stages in each process that may result in the discharge of an air pollutant. Include all emission points, emission units, pollution control equipment, and identification numbers. The narrative should complement the facility layout and process flow diagrams.

Is a Process Flow Diagram included with your application?	☒ Yes	
	☐ No	



SECTION 2: DETAILED SOURCE INFORMATION

Part E: Emission Calculations

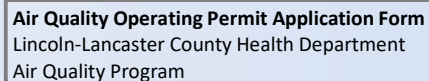
Indicate which method(s) will be used to calculate emissions: (check all that apply)

- | | |
|---|---|
| ☒ AP-42 or WebFIRE Emission Factors | |
| ☐ Emission Factors from Stack Testing * | |
| ☐ Material Mass-Balance Calculations * | |
| ☒ Other (specify >>>>) * | Vendor, BACT, 40 CFR Part 98, NSPS limits |
| ☐ Other (specify >>>>) * | |
| ☐ Other (specify >>>>) * | |

If using emission factors or calculation methods other than those provided in AP-42 or WebFIRE, attach a copy of any alternate emission factors (including stack test results) and/or emission calculations as an attachment to this application.

Indicate how material and/or fuel use will be substantiated:

- | | |
|---|---------------------------|
| ☐ Material / Fuel Supplier Record(s) | |
| ☐ Material / Fuel Use Logbook(s) | |
| ☐ Receiving / Load-Out Scale Tickets | |
| ☒ Other (specify >>>>) * | See attached calculations |
| ☐ Other (specify >>>>) * | |
| ☐ Other (specify >>>>) * | |

**Table 3-A: Emission Unit Identification**

Rev. 6/2012 Table 3-A | Emission Units Page 5

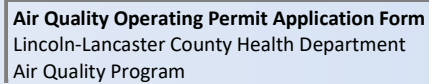


Table 3-B: Stack / Release Point Information

* *Stack information not required for fugitive sources.*

Rev. 6/2012

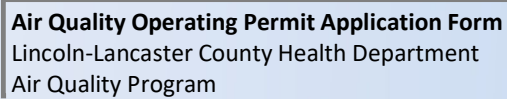


Table 4-A: Insignificant Activities List

Page 7

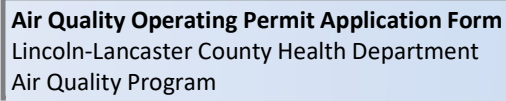


Table 4-B: Fuel Storage and Distribution Equipment Information

Page 8

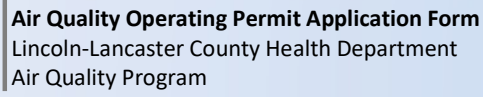


Table 4-C: Insignificant Cooling Towers

[illegible]

COMPANY	FACILITY NAME
Lincoln Electric System	TBGS

Description:

These calculations represent the different operating scenarios for Turbines 2, 3, and 4. The permit refers to the different scenarios by EU numbers which do not correspond to the number of the turbine.

Turbines 2 and 3 can operate in both simple-cycle and combined-cycle mode. In simple-cycle mode, either natural gas (EU#1-1, EU#3-1) or fuel oil (EU#1-2, EU#3-2) can be combusted using the bypass stack and controlled only with water injection. In combined-cycle mode, natural gas (EU#2-1, EU#4-1) can be combusted using the main stack and controlled with SCR and oxidation catalyst as well as with water injection. Each turbine in combined-cycle mode uses its own natural gas-fired duct burner.

Turbine 4 can operate only in simple-cycle mode. When burning natural gas, exhaust can use either the main stack with SCR and oxidation catalyst controls (EU#5-1) or use the bypass stack without add-on controls (EU#11-1). When burning fuel oil, exhaust exist through the bypass stack (EU#11-2). At all times, NOx is controlled with water injection.

Turbine Scenarios:

EU#	Turbine #	SC/CC	Control	Fuel	Stack	NOx ppm	Current Permit hr/yr	Notes
1-1	3	SC	WI	NG	Bypass	25	2,000	
1-2	3	SC	WI	FO	Bypass	42	500	
2-1	3	CC	WI/SCR/ OxCat	NG	Main	3.5	up to 8,760	add in DB emissions for PM10, VOC, SO2
3-1	2	SC	WI	NG	Bypass	25	2,000	
3-2	2	SC	WI	FO	Bypass	42	500	
4-1	2	CC	WI/SCR/ OxCat	NG	Main	3.5	up to 8,760	add in DB emissions for PM10, VOC, SO2
5-1	4	SC	WI/SCR/ OxCat	NG	Main	5	up to 8,760	
11-1	4	SC	WI	NG	Bypass	25	500	
11-2	4	SC	WI	FO	Bypass	42		

Application Updates:

EU#2-2 and EU#4-2 will be removed from the permit and the operating hours will be redistributed to provide more operating flexibility without increasing emissions over the PSD thresholds.

Operating Data:

Heating Value of Natural Gas	1,050	Btu/cf
Heating Value of Fuel Oil	139,000	Btu/gal
Heat Input of Turbine	439	MMBtu/hr
Heat Input of Duct Burner	22	MMBtu/hr
Sulfur Content in Fuel Oil	0.05	%

	MMBtu/hr	hours	quantity	MW	HP	VOC Control
Natural Gas-fired Auxiliary Boilers (6-1, 7-1)	44	8,760	2			
Fuel Oil-fired Blackstart (8-1)	17	500	1	1.75	2,346.79	
Natural Gas-fired Heater (9-1)	2.5	8,760	1			
Natural Gas Generators (12-1, 13-1, 14-1)	14.6	2,698	3		2,242.00	77.4%
Emergency Diesel Fire Pump (15-1)	2.99	500	1		300	

Greenhouse Gases (lb/MMBtu)			
	GWP	Natural Gas	Fuel Oil
CO2	1	116.98	163.05
CH4	25	0.0022	0.01
N2O	298	0.0002	0.00
CO2e		117.10	163.61

40 CFR Part 98, Appendices A and C

Turbine NOx Emission Rates:

Cycle	Fuel	Stack	NOx ppm
Simple	Nat. Gas	Bypass	25
Simple	Nat. Gas	Main	5
Simple	Nat. Gas	Bypass	42
Combined (includes duct burner)	Fuel Oil	Main	3.5

Turbine Emission Rates (lb/hr):

Duct Burner Emissions		
Pollutant	lb/MMBtu	lb/hr
PM ₁₀	0.0072	0.16
SO _x	0.001	0.01
NO _x	0.100	2.20
VOC	0.005	0.12
CO	0.080	1.76

	Unit 4						Units 2 or 3					
	EU# 5-1		EU#11-1		EU#12-1		EU# 1-1, 3-1		EU# 1-2, 3-2		EU# 2-1, 4-1	
	NG Main		NG Bypass		FO Bypass		NG SC Bypass		FO SC Bypass		NG CC Main	
	lb/hr	lb/hr	lb/hr	lb/hr	lb/hr	lb/hr	lb/hr	lb/hr	lb/hr	lb/hr	lb/hr	lb/hr
PM ₁₀	11.00	11.00	25.00	11.00	25.00	11.00	25.00	11.00	0.17			11.17
PM _{2.5}	11.00	11.00	25.00	11.00	25.00	11.00	25.00	11.00	0.17			11.17
NO _x	8.06	40.30	67.55	40.30	67.55	5.64	included					5.64
SO ₂	0.38	0.38	10.77	0.38	10.77	0.38	0.01					0.39
VOC	8.00	8.00	7.00	8.00	7.00	8.00	0.12					8.12
CO	13.00	60.00	24.12	60.00	24.12	13.00	included					13.00
CO _{2e}	51,406.06	51,406.06	71,826.29	51,406.06	71,826.29	51,406.06	2,576.16					53,982.22
Lead	-	-	6.15E-03	-	6.15E-03	-	-	-	-	-	-	-

	Unit 4			Units 2 or 3		EUR 1-2, 3-2		EUR 2-1, 4-1	
	EUR 5-1	EUR11-1	EUR11-2	EUR 1-1, 3-1	EUR 1-2, 3-2	NG CC Main	NG D8 Main	Total	
	NG Main lb/MMcf	NG Bypass lb/MMcf	FO Bypass lb/Mgal	NG SC Bypass lb/MMcf	FO SC Bypass lb/Mgal	lb/MMcf	lb/MMcf	lb/MMcf	
PM ₁₀	26.31	26.31	7.92	26.31	7.92	26.31	0.40	26.71	
PM _{2.5}	26.31	26.31	7.92	26.31	7.92	26.31	0.40	26.71	
NO _x	0.90	0.90	3.41	0.90	3.41	0.91	included	0.91	
SO ₂	19.28	96.39	21.39	96.39	21.39	13.49	0.03	13.53	
VOC	19.13	19.13	2.22	19.13	2.22	19.13	0.29	19.42	
CO	31.09	143.51	7.64	143.51	7.64	31.09	included	31.09	
CO _{2e}	122,952.99	122,952.99	22,742.27	122,952.99	22,742.27	122,952.99	6,161.65	129,114.65	
Lead	-	-	1.95E-03	-	1.95E-03	-	-	-	

EU	Hourly Process Rate	Units	Max Process Rate	Units	Max Process Rate	Units	PM10	PM2.5	NOX	SOX	VOC	CO	CO _{2e}	LEAD	Total HAP
							(lbs/yr)	(lbs/yr)	(lbs/yr)	(lbs/yr)	(lbs/yr)	(lbs/yr)	(lbs/yr)	(lbs/yr)	(lbs/yr)
1-1	0.418	MMcf/hr	2,800.00	MMcf/yr	6,697.04	hours	51,637.98	51,637.98	189,183.09	1,766.42	53,576.31	401,822.32	2.41E+08		49,980.00
3-1															
11-1															
1-2	3.158	Mgal/hr	6,325.00	Mgal/yr	2002.68	hours	50,066.91	50,066.91	135,279.31	21,568.83	-	-	1.44E+08	1.23E+01	
3-2															
11-2															
2-1a	0.418	MMcf/hr	2,729.18	MMcf/yr	6,528*	hours	71,804.19	71,804.19	36,829.08	2,480.51	52,221.23	84,859.50	3.36E+08		
2-1b	0.021	MMcf/hr	136.77	MMcf/yr	6,528*	hours	54.70	54.70	4.32	39.58	-	8.43E+05			
4-1a	0.418	MMcf/hr	2,729.18	MMcf/yr	6,528*	hours	71,804.19	71,804.19	36,829.08	2,480.51	52,221.23	84,859.50	3.36E+08		
4-1b	0.021	MMcf/hr	136.77	MMcf/yr	6,528*	hours	54.70	54.70	4.32	39.58	-	8.43E+05			
5-1	0.418	MMcf/hr	2,729.18	MMcf/yr	6,528*	hours	71,804.19	71,804.19	52,612.97	2,456.26	52,221.23	84,859.50	3.36E+08		
6-1	0.042	MMcf/hr	367.09	MMcf/yr	8760	hours	2,789.85	2,789.85	36,708.57	220.25	2,018.97	30,835.20	45,134,287.67		
7-1	0.042	MMcf/hr	367.09	MMcf/yr	8760	hours	2,789.85	2,789.85	36,708.57	220.25	2,018.97	30,835.20	45,134,287.67		
8-1	0.125	Mgal/hr	62.59	Mgal/yr	500	hours	498.51	498.51	27,840.00	439.35	783.00	7,395.00	1,423,436.77		
COOL 1&2	1.00	hours			8760	hours	12,414.08	6,207.04							
COOL 3,4,5	1.00	hours			8760	hours	25,073.64	12,536.82							

			requested limits				PM10	PM2.5	NOX	SOX	VOC	CO	CO _{2e}	LEAD	Total HAP
							15.00	10.00	40.00	4.00E+01	40.00	100.00	75000.00	0.60	

= Not Max fuel use on units, bypass fuel use subtracted from Max fuel use

* - hours in these cells are not operating limits, only presented for Max PTE purposes. Reflects remaining hours after accounting for mutually exclusive operating scenarios.

Plantwide w/o 12 1, 13-1, 14-1, 15-1	Pre tpy	177.03	169.49	288.61	16.04	109.01	392.80	759,181.90	0.01	24.99
	Post tpy	180.40	171.02	276.00	15.82	107.57	362.73	742,611.94	0.01	24.99
	Increase tpy	3.37	1.53	(12.61)	(0.22)	(1.44)	(30.07)	(16,569.96)	(0.00)	-

Hours to Fuel Change (1-1, 3-1, 11-1, 1-2, 3-2, 11-2, 2-2, 4-2)	Pre tpy	41.51	40.95	128.13	11.33	-	126.03	148,868.60	0.01	
	Post tpy	50.85	50.85	162.23	11.67	26.79	200.91	192,581.75	0.01	
	Increase tpy	9.34	9.90	34.10	0.34	26.79	74.88	43,713.15	(0.00)	-

Cooling Towers	Pre tpy	13.96	6.98							
	Post tpy	18.74	9.37							
	Increase tpy	4.78	2.39							

Other Equipment at the Facility:

	tpy				
	Natural Gas-fired Auxiliary Boilers (6-1, 7-1)	Fuel Oil-fired Blackstart (8-1)	Natural Gas-fired Heater (9-1)	Natural Gas Generators (12-1, 13-1, 14-1)	Emergency Diesel Fire Pump (15-1)
PM ₁₀	2.79	0.25	0.08	0.59	0.17
PM _{2.5}	2.79	0.25	0.08	0.59	0.17
SO ₂	0.22	0.22	0.01	0.03	0.15
NO _x	36.71	13.92	1.04	15.00	2.33
VOC	2.02	0.39	0.06	14.00	0.19
CO	30.84	3.70	0.88	40.00	0.50
CO _{2e}	45,134.29	711.72	1,282.22	6,917.72	122.24

	PM ₁₀	PM _{2.5}	SO ₂	NO _x	VOC	CO
Auxiliary Boiler	7.6	7.6	0.6	100	5.5	84
Heater	7.6	7.6	0.6	100	5.5	84
Fuel Oil-fired Blackstart	0.0573	0.0556	0.0505	3.2	0.09	0.85
Emergency Diesel Fire Pump (15-1)	0.0022	0.0022	0.00205	0.031	0.0025041	0.00668
Natural Gas Generators (12-1, 13-1, 14-1)	9.99E-03	9.99E-03	5.88E-04			

AP-42 Ch. 1.4 (3/09) Natural Gas Emission Factors (lb/MMcf)
AP-42 Ch. 1.4 (3/09) Natural Gas Emission Factors (lb/MMcf)
AP-42 Ch. 3.4 (10/96) Fuel Oil Factors (lb/MMBtu)
AP-42 Ch. 3.3 (10/96) Fuel Oil Factors (lb/hp-hr)
AP-42 Ch. 3.2 (7/00) Natural Gas Factors (lb/MMBtu) (for 2-stroke Lean Burn)
NSPS IIII (g/HP-hr)

Cooling Towers:

	Cooling Tower 1/2 (2 cells)	Cooling Tower 3/4/5 (3 cells)	
Tower Circulation Rate =	35,400	28,600	gallons per minute
Cycles of Concentration =	1	1	
Tower Drift Efficiency =	0.002%	0.005%	
Water loss due to drift (tower total) =	0.71	1.43	gallons per minute
Total Dissolved Solids =	4,000.00	4,000.00	ppm
Water density =	8.34	8.34	pounds per gallon
Cells =	2	3	number of cells
Pounds of water lost due to drift =	5.90	11.93	pounds per minute
	0.004	0.004	pounds/solids per pound water
	0.024	0.048	pounds particulate per minute
	1.42	2.86	pounds per hour - entire tower
	0.71	0.95	lb/hr per cell
	6.21	12.54	tpy entire tower



SECTION 5 – MAXIMUM POTENTIAL TO EMIT (MPTE)

Table 5-A: Facility-Wide MPTE – Regulated Air Pollutant Emissions

Please list maximum potential emissions of all pollutants for each emission unit in pounds per year.

Emission Unit #	PM ₁₀	PM _{2.5}	NO _x	SO _x	VOC	CO	GHGs (CO ₂ e)	LEAD	Total HAP
1-1, 3-1, 11-1	51,638	51,638	189,183	1,766	53,576	401,822	2.4E+08	-	49,980
1-2, 3-2, 11-2	50,067	50,067	135,279	21,569	-	-	1.4E+08	12.31	
2-1a	71,804	71,804	36,829	2,481	52,221	84,859	3.4E+08	-	
2-1b	54.70	54.70	-	4.32	39.58	-	842,729	-	
4-1a	71,804	71,804	36,829	2,481	52,221	84,859	3.4E+08	-	
4-1b	54.70	54.70	-	4.32	39.58	-	842,729	-	
5-1	71,804	71,804	52,613	2,456	52,221	84,859	3.4E+08	-	
6-1, 7-1	5,580	5,580	73,417	441	4,038	61,670	9.0E+07	-	
8-1	499	499	27,840	439	783	7,395	1.4E+06	-	
9-1	159	159	2,086	13	115	1,752	2.6E+06	-	
12-1	393.45	393.45	10,000	23.16	9,333	26,667	4.6E+06	-	
13-1	393.45	393.45	10,000	23.16	9,333	26,667	4.6E+06	-	
14-1	393.45	393.45	10,000	23.16	9,333	26,667	4.6E+06	-	
15-1	330.00	330.00	307.50	4,650	375.62	1,002	244,479	-	
COOL 1&2	12,414	6,207	-	-	-	-	-	-	-
COOL 3,4,5	25,074	12,537	-	-	-	-	-	-	-

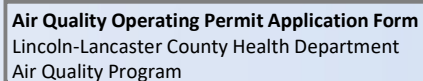
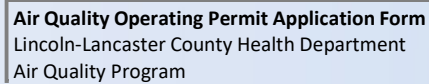


Table 5-B: Facility-Wide MPTE – VOC Emissions from VOC-Containing Materials

Please list the maximum throughput of all materials used that contain Volatile Organic Compounds, and show amount of VOC emitted.

[illegible]



For a complete list of EPA regulated Hazardous Air Pollutants, including CAS Numbers, click [here](#).

Please list the maximum throughput of all materials used that contain Hazardous Air Pollutants (HAP) and show amount of HAP emitted.

[illegible]



SECTION 5 – MAXIMUM POTENTIAL TO EMIT (MPTE)

Table 5-D: Maximum Potential to Emit and Operating Permit Thresholds

Criteria Pollutant Name	Emissions (tons per year)	Class II Permitting Threshold (tons per year)	Meet or Exceed?	Class I Permitting Threshold (tons per year)	Meet or Exceed?
PM ₁₀	>15.0	15.0	Yes	100.0	Yes
PM _{2.5}	>10.0				
NO _x	>40.0	40.0	Yes	100.0	Yes
SO _x	>40.0	40.0	Yes	100.0	Yes
VOC	>40.0	40.0	Yes	100.0	Yes
CO	>50.0	50.0	Yes	100.0	Yes
Lead	<0.6	0.6	No	5.0	No
GHGs	>100,000 CO ₂ e				
HAP Category	Emissions (tons per year)	Class II Permitting Threshold (tons per year)	Meet or Exceed?	Class I Permitting Threshold (tons per year)	Meet or Exceed?
Greatest Single HAP	2.5 < 10	2.5	Yes	10.0	No
Total Combined HAP	10 < 25	10.0	Yes	25.0	No



SECTION 6: DETERMINATION OF SOURCE CLASS

Part A: Operating Permit Class

The maximum potential emissions from your facility meet or exceed Class I permitting thresholds. However, the maximum potential HAP emissions from your facility are less than the HAP 'Major Source' thresholds. Proceed to answer the following questions.

Do you wish to take enforceable permit requirements to limit emissions to levels that are lower than Class I Permit thresholds?

☐ Yes

☒ No

☐ Yes

☐ No

Your facility will be classified as a Class I (Title V) source of criteria pollutants, and as an 'Area Source' of HAP. Proceed to Part D of this section, below.

Because you are not taking Synthetic Minor limits and your facility is an 'Area Source' of HAP, Parts B and C of this section do not apply. Complete Part D of this section, below.

Part B: Source Elected Requirements for Synthetic Minor Sources

Not applicable.

Not applicable.

Not Applicable.

☐ Yes

☐ No

Not Applicable.

☐ Yes

☐ No

Part C: Source Elected Requirements for Synthetic Area Sources of HAPs

Not Applicable.

Not Applicable.

Not Applicable.

☐ Yes

☐ No

Not Applicable.

☐ Yes

☐ No

Part D: Source Elected Requirements for Actual Emission Reductions

All sources that are required to hold an operating permit are required to pay an annual emission fee based on actual pollutant emissions.

You may agree to control requirements in order to reduce actual emissions of pollutants to the atmosphere, thereby reducing the annual emission fees. Check the following, as applicable.

Do you agree to accept control requirements to reduce actual pollutant emissions?	☐ Yes	☒ No
---	------------------------------	--

Sources may also agree to throughput limits in their permit to prevent the possibility of exceeding permit thresholds. Check the following, as applicable.

Do you agree to accept throughput limits to prevent possible exceedances of permit thresholds?	☐ Yes	☒ No
--	------------------------------	--

If you do not wish to take limits to reduce emissions, and you did not agree to accept any limits or control requirements in Parts B or C, then skip Table 6-A and proceed to Section 7.

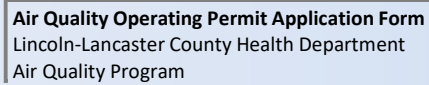


Table 6-A: Source-Elected Throughput Limits and Emission Control Requirements

In the table below, indicate which emission units you will either accept throughput limits on, or to which you will agree to apply control equipment.

**Please see the existing Title V permit for a summary of required emission controls and limits.
LES is not proposing new controls as part of this application.**

**Bypass operation will be limited to 2,800 MMcf/yr over units EUs 11-1, 1-1, 3-1.
Fuel oil operation will be limited to 6,325 Mgal/yr over units EUs 11-2, 1-2, 3-2.**



SECTION 7 – ACTUAL POTENTIAL TO EMIT (APTE)

Table 7-A: Facility-Wide APTE – Regulated Air Pollutant Emissions

Shown below is your source's potential emissions after applying any operational limits or control equipment you elected in Section 6. Emissions are in units of pounds.

Emission Unit #	SCC Code	Annual Throughput	Throughput Units	PM ₁₀	PM _{2.5}	NOx	SOx	VOC	CO	GHGs (CO ₂ e)	LEAD	Total HAP
1-1, 3-1, 11-1	2-01-002-01	439.00	MMBtu/hr	51,638	51,638	189,183	1,766	53,576	401,822	2.41E+08	-	49,980
1-2, 3-2, 11-2	2-01-001-01	439.00	MMBtu/hr	50,067	50,067	135,279	21,569	-	-	1.44E+08	12.31	-
2-1a	2-01-002-01	439.00	MMBtu/hr	71,804	71,804	36,829	2,481	52,221	84,859	3.36E+08	-	-
5-1	2-01-002-01	439.00	MMBtu/hr	71,804	71,804	52,613	2,456	52,221	84,859	3.36E+08	-	-
6-1, 7-1	1-01-006-02	44.00	MMBtu/hr	5,580	5,580	73,417	440.50	4,038	61,670	9.03E+07	-	-
8-1	2-01-001-02	17.40	MMBtu/hr	498.51	498.51	27,840	439.35	783.00	7,395	1.42E+06	-	-
9-1	N/A	2.50	MMBtu/hr	158.51	158.51	2,086	12.51	114.71	1,752	2.56E+06	-	-
12-1	2-01-008-02	2,242	HP	393.45	393.45	10,000	23.16	9,333	26,667	4.61E+06	-	-
13-1	2-01-008-02	2,242	HP	393.45	393.45	10,000	23.16	9,333	26,667	4.61E+06	-	-
14-1	2-01-008-02	2,242	HP	393.45	393.45	10,000	23.16	9,333	26,667	4.61E+06	-	-
15-1	2-02-001-02	300.00	HP	330.00	330.00	307.50	4,650	375.62	1,002	244,479	-	-
COOL 1&2	3-85-001-01	35,400	gpm	12,414	6,207	-	-	-	-	-	-	-
COOL 3,4,5	3-85-001-01	28,600	gpm	25,074	12,537	-	-	-	-	-	-	-

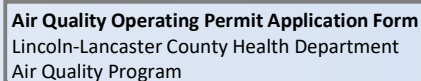


Table 7-B: Facility-Wide APTE – VOC Emissions from VOC-Containing Materials

Please indicate whether you are accepting throughput limits or emission control requirements for VOC-containing materials. Emissions will be calculated in units of pounds.

This form is not applicable.

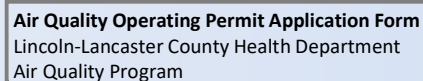


Table 7-C: Facility-Wide APTE – HAP Emissions from HAP-Containing Materials

Please indicate whether you are accepting throughput limits or emission control requirements for HAP-containing materials. Emissions will be calculated in units of pounds.

[illegible]



SECTION 7 – ACTUAL POTENTIAL TO EMIT (APTE)

Table 7-D: Actual Potential to Emit and Operating Permit Thresholds

Criteria Pollutant Name	Emissions (tons per year)	Class II Permitting Threshold (tons per year)	Meet or Exceed?	Class I Permitting Threshold (tons per year)	Meet or Exceed?
PM ₁₀	>15.0	15.0	Yes	100.0	Yes
PM _{2.5}	>10.0				
NO _x	>40.0	40.0	Yes	100.0	Yes
SO _x	>40.0	40.0	Yes	100.0	Yes
VOC	>40.0	40.0	Yes	100.0	Yes
CO	>50.0	50.0	Yes	100.0	Yes
Lead	<0.6	0.6	No	5.0	No
GHGs	>100,000 CO ₂ e				
HAP Category	Emissions (tons per year)	Class II Permitting Threshold (tons per year)	Meet or Exceed?	Class I Permitting Threshold (tons per year)	Meet or Exceed?
Greatest Single HAP	2.5 < 10	2.5	Yes	10.0	No
Total Combined HAP	10 < 25	10.0	Yes	25.0	No



SECTION 8: PERMIT SHIELD

Part A: Permit Shield Applicability

Do you wish to apply for a 'permit shield' as defined in Article 2, Section 8 of the LLCAPCPRS?



Yes

Yes, I wish to apply for a permit shield.



No

No, I do not wish to apply for a permit shield.

In the space provided under Part B (below), include all regulations from which you would like to be shielded from applicability.

Part B: Regulations Included Under Permit Shield

Regulation Citation (e.g. 40 CFR 63 Subpart A)	Regulation Name (e.g. General Provisions)	Reason(s) why regulation does not apply.
40 CFR 63 Subpart YYYY	Combustion Turbine MACT	NESHAP YYYY applies to stationary combustion turbines at major sources of HAP emissions. The TBGS is currently not a major source of HAPs. Thus, NESHAP YYYY is not applicable to the combustion turbines at TBGS. If LES were to become a major source, the combustion turbines at LES would be existing stationary combustion turbines as defined in 40 CFR 63.6090. According to Subpart B of 40 CFR 63.6090, existing stationary combustion turbines are not required to meet the requirements specified in 40 CFR 63, Subpart YYYY. Therefore, LES is not subject to the Combustion Turbine MACT.
40 CFR 63 Subpart DDDDD	Major Source Boiler MACT	NESHAP DDDDD applies to industrial boilers and process heaters at major sources of HAPs. The TBGS is currently not a major source of HAP. Thus, NESHAP DDDDD is not applicable to any boilers or process heaters at TBGS.
40 CFR 63 Subpart JJJJJ	Area Source Boiler MACT	NESHAP JJJJJ applies to some industrial, institutional and commercial boilers at area sources of HAPs. TBGS is an area source of HAPs. The two natural gas-fired auxiliary boilers at the facility are not subject to NESHAP JJJJJ because they are gas-fired boilers and per 40 CFR 63.11195, gas-fired boilers are exempt from NESHAP JJJJJ.



SECTION 8: PERMIT SHIELD

40 CFR 60 Subpart Kb	NSPS for Tanks	LES has two, 975,000-gallon No. 2 fuel oil storage tanks at TBGS. On October 14, 2003, a direct final rule was promulgated by the EPA that modified NSPS Subpart Kb. Prior to October 14, 2003, petroleum liquid storage vessels with a capacity between 75 and 151 m ³ storing liquid with vapor pressure less than 15 kPa, and storage vessels with a capacity greater than or equal to 151 m ³ storing liquid with vapor pressure less than 3.5 kPa were subject only to NSPS Subpart Kb recordkeeping requirements. The October 14, 2003, modifications to NSPS Subpart Kb removed storage vessels that were previously subject only to recordkeeping requirements from being subject to NSPS Subpart Kb. Based on the October 14, 2003, modifications to NSPS Subpart Kb, the No. 2 fuel oil tanks at TBGS are no longer subject to NSPS Subpart Kb.
----------------------	----------------	---

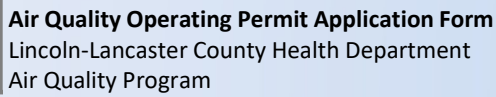


SECTION 9: APPLICABLE RULES AND REQUIREMENTS

PART A: Applicable Requirements of the LLCAPCPRS

Applicable requirements for your source may include maintaining allowable stack opacity, maintaining allowable particulate emissions for the total given heat input, adhering to fugitive dust regulations, adhering to the process weight/particulate emissions rates, adhering to all construction permit conditions, etc. In the boxes below, check all of those requirements in the LLCAPCPRS that may apply to your source, and identify the method by which you intend to demonstrate compliance with the requirement. If a requirement does not apply to your source, briefly explain the reason it does not apply.

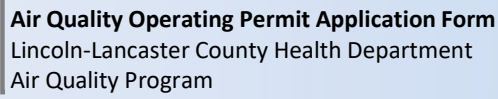
Requirement Citation & Name	Does standard apply?	If "Yes", describe compliance method. If "No", explain reason it does not apply.
LLCAPCPRS Article 2, Section 18: New Source Performance Standards (40 CFR Part 60)	☒ Yes ☐ No	Describe compliance with each applicable NSPS in Part B, below.
LLCAPCPRS Article 2, Section 19: Prevention of Significant Deterioration (PSD) of Air Quality	☒ Yes ☐ No	Refer to Class I Operating Permit.
LLCAPCPRS Article 2, Section 20, paragraph (A)(1): Particulate Emission Stds. for Incinerators & Burn-Ovens	☐ Yes ☒ No	There are no incinerators or burn-ovens at the source.
LLCAPCPRS Article 2, Section 20, paragraph (B): Particulate Emission Stds. for Combustion Units >10,000 & <10 MMBtu	☒ Yes ☐ No	Refer to Class I Operating Permit.
LLCAPCPRS Article 2, Section 20, paragraph (C): Particulate Emission Stds. for Combustion Units <10,000 & >10 MMBtu	☒ Yes ☐ No	Refer to Class I Operating Permit.
LLCAPCPRS Article 2, Section 20, paragraph (E): <20% Opacity of Visible Emissions	☒ Yes ☐ No	Refer to Class I Operating Permit.
LLCAPCPRS Article 2, Section 20, Table 20-1: Process Weight Rate Particulate Emission Stds.	☒ Yes ☐ No	Refer to Class I Operating Permit.
LLCAPCPRS Article 2, Section 21: Compliance Assurance Monitoring (CAM) (40 CFR Part 64)	☒ Yes ☐ No	Attach CAM Plan to Permit Application.
LLCAPCPRS Article 2, Section 22, paragraph (A)(14): Standards for Pathological Material Incinerators	☐ Yes ☒ No	There are no incinerators at the source.
LLCAPCPRS Article 2, Section 22, paragraph (C): Standards for Air Curtain Incinerators	☐ Yes ☒ No	There are no incinerators at the source.
LLCAPCPRS Article 2, Section 23: Hazardous Air Pollutants - Emission Standards (40 CFR Part 61)	☒ Yes ☐ No	Describe compliance with each applicable HAP standard in Part B, below.
LLCAPCPRS Article 2, Section 24: Sulfur Compound Emissions - Existing Sources - Emission Standards	☒ Yes ☐ No	Refer to Class I Operating Permit.
LLCAPCPRS Article 2, Section 25: Nitrogen Oxides - Emission Standards for Existing Stationary Sources	☐ Yes ☒ No	Refer to Class I Operating Permit.
LLCAPCPRS Article 2, Section 26: Acid Rain (40 CFR Parts 72 through 78)	☒ Yes ☐ No	Describe compliance with each applicable Acid Rain standard in Part B, below.
LLCAPCPRS Article 2, Section 27: Hazardous Air Pollutants - Maximum Achievable Control Technology (MACT)	☒ Yes ☐ No	Describe compliance with each applicable standard in Part B, below.
LLCAPCPRS Article 2, Section 28: MACT Emission Standards (40 CFR Part 63)	☐ Yes ☒ No	If none apply, in Part C, list any that 'appear' to apply, but do not actually apply.
LLCAPCPRS Article 2, Section 32: Dust - Duty to Prevent the Escape Of	☒ Yes ☐ No	Refer to Class I Operating Permit.



PART B: Applicable Federal Regulations and Additional Applicable LLCAPCPRS

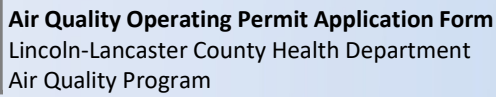
Regulation Name (e.g. NSPS for Grain Elevators)	Regulation Citation (e.g. 40 CFR 60 Subpart DD)	Emission unit(s) covered by this regulation.
--	--	--

Page 26



PART B: Applicable NSPS, NESHAPs, MACT Standards, and Acid Rain Requirements (continued)

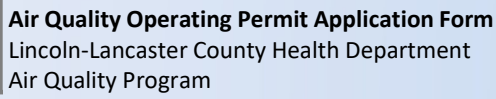
For complete details of applicable regulations and associated emission units, please refer to the current Title V Operating Permit.



PART C: Non-Applicable LLCAPCPRS Regulations & Non-Applicable Federal Regulations

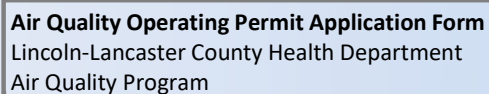
Regulation Citation (e.g. 40 CFR 60 Subpart DD)	Provide the reason(s) the regulation does not apply to your source.

[illegible]



PART C: Non-Applicable LLCAPCRS Regulations & Non-Applicable Federal Regulations

For complete details of applicable regulations and associated emission units, please refer to the current Title V Operating Permit.



Part A: Compliance Status for Applicable Rules and Requirements

☒ Yes

☐ No

[illegible]Page 30



APPLICATION COMPLETENESS CHECKLIST

Does this application contain confidential information?	☐ Yes ☒ No	If "Yes" are application pages containing confidential data clearly marked?	☐ Yes ☒ No
---	--	---	--

Continue with the remainder of the checklist.

Will your source require a Class I (Title V) operating permit?

☒ Yes
☐ No

You must submit the original signed operating permit application, as well as two (2) additional signed copies of the permit application.

Section Number & Name	Included With Application?	If not included, provide reason.
Section 1: Administrative Information And Responsible Official Certification	☒ Yes ☐ No	
Section 2: Detailed Source Information	☒ Yes ☐ No	
Table 3-A: Emission Unit Identification	☒ Yes ☐ No	
Table 3-B: Stack / Release Point Information	☒ Yes ☐ No	
Table 4-A: Insignificant Activities List	☒ Yes ☐ No	
Table 4-B: Fuel Storage and Distribution Equipment Information	☐ Yes ☒ No	See Table 4-A
Table 4-C: Insignificant Cooling Towers	☒ Yes ☐ No	
Table 5-A: Facility-Wide MPTE – Regulated Air Pollutant Emissions	☒ Yes ☐ No	
Table 5-B: Facility-Wide MPTE – VOC Emissions from VOC-Containing Materials	☒ Yes ☐ No	Form Does Not Apply
Table 5-C: Facility-Wide MPTE - HAP Emissions from HAP-Containing Materials	☒ Yes ☐ No	Form Does Not Apply
Table 5-D: Maximum Potential to Emit and Operating Permit Thresholds	☒ Yes ☐ No	
Section 6: Determination Of Source Class	☒ Yes ☐ No	
Table 6-A: Source-Elected Throughput Limits and Emission Control Requirements	☒ Yes ☐ No	
Table 7-A: Facility-Wide APTE – Regulated Air Pollutant Emissions	☒ Yes ☐ No	
Table 7-B: Facility-Wide APTE – VOC Emissions from VOC-Containing Materials	☐ Yes ☒ No	Form Does Not Apply
Table 7-C: Facility-Wide APTE – HAP Emissions from HAP-Containing Materials	☐ Yes ☒ No	Form Does Not Apply
Table 7-D: Actual Potential to Emit and Operating Permit Thresholds	☒ Yes ☐ No	