



CLASS I AIR QUALITY OPERATING PERMIT

Issued to: NANIWA ENERGY, LLC

Section VII. Emission Caps

A. Cap for Emission Units S2.001 - S2.006

1. Emission Limits

On and after the date of startup of S2.001 - S2.006, Naniwa Energy, LLC will not discharge or cause the discharge into the atmosphere, the following pollutants in excess of the following specified limits:

- a. The combined discharge of PM (total particulate matter) to the atmosphere will not exceed 16.66 tons per calendar month, averaged over each 12-month rolling period.
- b. The combined discharge of PM₁₀ (particulate matter less than 10 microns in diameter) to the atmosphere will not exceed 16.66 tons per calendar month, averaged over each 12-month rolling period.
- c. The combined discharge of NO_x (oxides of nitrogen) to the atmosphere will not exceed 20.75 tons per calendar month, averaged over each 12-month rolling period.
- d. The combined discharge of SO₂ (sulfur dioxide) to the atmosphere will not exceed 16.66 tons per calendar month, averaged over each 12-month rolling period.
- e. The combined discharge of CO (carbon monoxide) to the atmosphere will not exceed 20.75 tons per calendar month, averaged over each 12-month rolling period.
- f. The combined discharge of VOC (volatile organic compounds) to the atmosphere will not exceed 16.66 tons per calendar month, averaged over each 12-month rolling period.
- g. The emission limits in this paragraph apply at all times, including startups, shutdowns, and normal operations.

2. Monitoring, Recordkeeping, Reporting, and Compliance

- a. Naniwa Energy, LLC will perform monitoring, recordkeeping and reporting as specified in Section VI.A.4. of this operating permit.
- b. In addition to the monitoring and recordkeeping information required under A.2.a. of this Section, Naniwa Energy, LLC will record in a contemporaneous log the monthly emissions (in tons) of each pollutant for which an emission factor is established in accordance with Section VI.A.4.a.(5) and Section VI.B.4.a.(5) of this Operating Permit. Emissions will be determined and recorded as follows:
 - (1) Determine and record for each unit the total monthly (calendar) fuel usage during startup.
 - (2) Determine and record for each unit the total monthly (calendar) emissions of CO due to startup by multiplying the total monthly fuel usage in A.2.b.(1) of this Section by the representative startup emission factor as determined in VI.A.4.a.(5) and VI.B.4.a.(5) of this operating permit.
 - (3) Determine and record for each unit the total monthly (calendar) fuel usage during normal operating conditions.
 - (4) Determine and record for each unit the total monthly emissions (in tons) of each pollutant by multiplying the total monthly fuel usage recorded in A.2.b.(3) of this Section by the average emission factors for each pollutant determined in VI.A.4.a.(5) and VI.B.4.a.(5) of this Operating Permit.
- c. In addition to the monitoring and recordkeeping information required under A.3.a. and b. of the Section, Naniwa Energy, LLC will record in a contemporaneous log the total cumulative 12-month rolling average emissions for each pollutant recorded in A.2.b. of this Section.