05/28/2026

Michael Montfort
Bistrozzi LLC
1700 K Street, N.W., Fifth Floor
Washington, DC 20006-3817

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL

Facility ID:	0302022054
Permit Number:	P0138965
Permit Type:	Initial Installation
County:	Allen

No	TOXIC REVIEW
No	PSD
Yes	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	MACT/GACT
Yes	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
Yes	MODELING SUBMITTED
No	MAJOR GHG
	SYNTHETIC MINOR TO AVOID MAJOR

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit may contain several conditions and restrictions, we urge you to read it carefully. In this letter, you will find the information on the following topics:

- **Pay any applicable permit fee**
- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**
- **What should you do if you notice a spill or environmental emergency?**

Pay any applicable permit fee

If there is an enclosed invoice that is associated with this permit action, you must pay the invoice in 30 days. This permit fee supports Ohio EPA's activities to review and issue the necessary approvals for construction or modification of the affected sources. Failure to provide the applicable permit fee within 30 days may result in the accrual of substantial interest penalties. This permit is also conditioned on the payment of any applicable permit fee.

How to appeal this permit

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of $70.00, made payable to "Ohio Treasurer Robert Sprague," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission

30 East Broad Street, 4th Floor
Columbus, OH 43215

How to save money, reduce pollution and reduce energy consumption

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact the Small Business Environmental Assistance Program in our Compliance Assistance & Special Projects unit - ***Contacts | Ohio Environmental Protection Agency***. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and state tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: ***Ohio Air Quality Development Authority | Ohio.gov***

How to give us feedback on your permitting experience

Please complete a survey at ***DAPC - Customer Satisfaction Survey*** and give us feedback on your permitting experience. We value your opinion.

How to get an electronic copy of your permit

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Ohio EPA document search webpage: ***eDocument Search.***

What should you do if you notice a spill or environmental emergency?

Any spill or environmental emergency which may endanger human health or the environment should be reported to the Emergency Response 24-HOUR EMERGENCY SPILL HOTLINE toll-free at (800) 282-9378. Report non-emergency complaints to the appropriate district office or local air agency.

If you have any questions regarding your permit, please contact at Ohio EPA DAPC, Northwest District Office at (419)352-8461.

Sincerely,

Robert Hodanbosi
Chief, Division of Air Pollution Control

cc: U.S. EPA
Ohio EPA-NWDO; Indiana

Response to Comments

Facility ID:	0302022054
Facility Name:	Bistrozzi LLC
Facility Description:	Facility
Facility Address:	N Cole Rd. and W Bluelick Rd. Lima, OH 45801 Allen County
Permit:	P0138965, Permit-To-Install - Initial Installation
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review on February 9, 2026. The comment period ended on March 25, 2026.	
Hearing Date (if held):	March 11, 2026
Hearing Public Notice Date (if different from draft public notice):	

The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

To help you review this document, the questions are grouped by topic and organized in a consistent format. PDF copies of the original comments in the format submitted are available upon request.

Topic: Public Health and Air Emissions

Comment 1: Multiple commenters expressed serious concerns about the health impacts of air pollution from the Bistrozzi facility in Allen County, Ohio. The comments consistently referenced:

a) Elevated rates of asthma and cancer in the Allen County area.

b) Special considerations taken for the vulnerable populations, including children and the elderly.

c) Cumulative health risks associated with the addition of Bistrozzi to the existing air pollution levels in Allen County.

d) Calls for and stronger regulatory oversight to protect public health, including the need for additional air monitoring.

Response 1: Ohio EPA issues and enforces permits for installing and operating air pollution sources to ensure compliance with air quality standards that protect public health and the environment. Permits are based on technical review and the best available science and are not issued if health-based standards would be exceeded.

Ohio EPA's air permitting process ensures that facility emissions do not exceed the National Ambient Air Quality Standards (NAAQS), which protect public health, especially for sensitive groups like

children and the elderly. All permit applications undergo a thorough technical review, including air dispersion modeling when needed, to evaluate potential impacts on surrounding areas. Compliance with this permit is expected to protect public health and welfare now and in the future.

Facilities receiving permits for installation and operation are required to meet the primary and secondary NAAQS for carbon monoxide (CO), nitrogen oxides (NO_x), lead (Pb), ozone (O_3), sulfur dioxide (SO_2), particulate matter ($PM_{2.5}$), and PM_{10}.

Air permitting standards, such as NAAQS, are developed by U.S. EPA through a separate science-based process that involves extensive health risk assessments, peer-reviewed research, and public input. Permits-to-install ensure that facilities are built to comply with these established standards, and the requirements established in the permit-to-install are based on the best available science and regulatory framework. If a project would exceed these standards, a permit is not issued.

Some comments raised broader concerns about community health outcomes, including elevated rates of ***asthma*** and ***cancer***. These are important community concerns and Ohio EPA's sister agency, the Ohio Department of Health (ODH) and ***local health departments*** have the authority to conduct health assessments or investigate disease patterns. Additionally, U.S. EPA offers programs that support community-based air monitoring and participatory science initiatives.

Comment 2: Several commenters asked about the introduction of "forever chemicals" into the air. What chemicals will be used in cooling tower water treatment, and what are their permitted atmospheric discharge rates? Can testing for per- and polyfluoroalkyl substances (PFAS) be added to the testing and monitoring for this permit?

Response 2: To prevent scale and fouling of the equipment, the facility may use additives in cooling tower water that may contain PFAS. While there is potential for PFAS to enter the air through cooling tower emissions or equipment leaks, these additives typically have low volatility (the tendency of a substance to evaporate) and are intended to remain in the water to protect against corrosion. The quantity of any potential release of additives into the air is expected to be negligible. Ohio EPA has requested that the facility notify the agency if any additives with measurable volatility are used.

For diesel engines, there is no evidence that PFAS chemicals are inherent ingredients in the fuel itself. Diesel fuel is a refined hydrocarbon mixture, while PFAS are synthetic chemicals often used for water/oil repellency in other products. PFAS may be present in fuel system additives; however, the quantity of any potential release from the combustion of additives is expected to be extremely small.

It is not appropriate to add testing and monitoring for PFAS in this permit. For additional information on PFAS, please refer to U.S. EPA's ***PFAS Strategic Roadmap: EPA's Commitments to Action 2021-2024***.

Topic: Environmental Justice

Comment 3: Commenters expressed concern over the apparent lack of review of Environmental Justice concerns and submitted the following questions:

a. Does this area qualify as an Environmental Justice community?

b. Has EPA evaluated this area using EJScreen or equivalent tools?

c. How will EPA ensure that this project does not disproportionately impact already overburdened populations?

Response 3: As a recipient of federal funding, Ohio EPA must comply with ***Title VI of the Civil Rights Act***. We fulfill these obligations through technical review and public involvement on permit

applications. Title VI prohibits states from using criteria or methods that result in discrimination based on race, color, or national origin. Ohio EPA considers all related permit comments to ensure compliance with Title VI. Ohio EPA issues permits based upon standards that are equally protective of all Ohioans. Individuals may also file environmental justice complaints under Title VI of the Civil Rights Act with U.S. EPA. Ohio EPA remains committed to transparency and encourages continued public engagement to ensure that environmental protections are upheld and that public health is protected.

Topic: Air Quality/Monitoring

Comment 4: Commenters expressed concern over the lack of adequate air monitoring near the Bistrozzi facility. They emphasized that current monitoring practices are insufficient to protect public health and do not reflect the true pollution burden faced by nearby residents.

Response 4: Ohio EPA operates a ***State and Local Air Monitoring Station*** (SLAMS) network, which is reviewed annually and approved by U.S. EPA. The placement of monitors is determined through a network assessment process that considers factors such as:

- Population density and community demographics
- Proximity to emission sources
- Historical air quality data
- Local meteorological conditions (e.g., prevailing wind direction)
- Community input

While the Bistrozzi facility does not currently have a dedicated SLAMS monitor, the surrounding regional monitors, including the Lima air monitoring site at 2650 Bible Road (AQS ID 39-003-0009), are part of a network designed to evaluate compliance with NAAQS and to characterize air quality across the region. The Lima air monitoring site was strategically placed to measure $PM_{2.5}$ (particles with a diameter of 2.5 micrometers or smaller), O_3, and SO_2. The $PM_{2.5}$ and SO_2 monitors operate continuously, while the O_3 monitor operates continuously during ozone season (March 1 through October 31). For more information on air monitoring, please review Ohio EPA's complete ***Air Monitoring Network Plan***.

Regarding requests for fenceline or real-time monitoring, Ohio EPA notes that such systems are not required under current federal or state regulations unless specific risk-based criteria are met.

We encourage community members to report air quality concerns through our ***online complaint tracker*** or contact our Northwest District Office directly by phone at 419.352.8461.

Comment 5: Will monitoring data be made publicly available in real time?

Response 5: Real-time air quality monitoring and forecasts across the country are available on ***U.S. EPA's Air Now website***. While this facility will have air monitoring and reporting requirements, those will not be available in real time. However, they will be public records that can be ***requested***.

Comment 6: What enforcement actions are taken if NAAQS thresholds are exceeded?

Response 6: Ohio EPA will oversee the facility's compliance with this permit and cite violations and/or escalate enforcement if needed. We will continue to regulate air emissions in Ohio to maintain attainment with the NAAQS. However, if Allen County is designated as non-attainment, Ohio EPA will immediately initiate the process to bring the county back into compliance. This process involves multiple steps and can include permit modifications to impose more stringent limits on existing facilities and require additional controls. It is important to note that NAAQS exceedances can occur for short durations even when the county is designated in attainment.

Comment 7: Does Ohio EPA monitor for acid rain?

Response 7: No. The federal government has a national network of air quality monitoring known as the National Atmospheric Deposition Program (NADP). The NADP program measures contaminants including acidity in rainwater in about 250 locations across the U.S.

Comment 8: What is the current baseline for $PM_{2.5,}$ ozone, and other criteria pollutants in this area? How close are these levels to NAAQS? What are the NAAQS values?

Response 8: The NAAQS currently in effect are:

Pollutant	**Primary/ Secondary Standards**	**Averaging Time**	**Level**	**Form**
CO	Primary	8 hours	9 ppm	Not to be exceeded more than once per year
		1 hour	35 ppm	
Lead	Primary and secondary	Rolling 3-month average	0.15 ug/m^3	Not to be exceeded
NO_2	Primary and secondary	1 year	53 ppb	Annual mean
	Primary	1 hour	100 ppb	98th percentile of 1-hour daily maximum concentrations, averaged over three years
PM_{10}	Primary and secondary	24 hours	150 ug/m^3	Not to be exceeded more than once per year on average over three years
$PM_{2.5}$	Primary	1 year	9.0 ug/m^3	annual mean, averaged over three years
	Secondary	1 year	15.0 µg/m^3	annual mean, averaged over three years
	Primary and secondary	24 hours	35 ug/m^3	98th percentile, averaged over three years
Ozone	Primary and secondary	8 hours	0.070 ppm	Annual fourth-highest daily maximum 8-hour concentration, averaged over three years

SO_2	Primary	1 hour	75 ppb	99th percentile of one-hour daily maximum concentrations, averaged over three years
	Secondary	1 year	10 ppb	Annual mean, averaged over three years

Allen County is currently classified as in attainment or not classifiable for all criteria pollutants. The most recent $PM_{2.5,}$ ozone, and SO_2 monitoring data are below.

$PM_{2.5}$ Monitoring Results: 39-003-0009 (Allen County)

Year	24-hr Average Conc. (µg/m3)	3-Yr Average of 24-Hr Average Conc. (µg/m3)	Annual Arithmetic Mean Conc. (µg/m3)	3-Yr Average of Annual Arithmetic Mean Conc. (µg/m3)
2025	20.6	23	7.8	7.4

SO_2 Monitoring Results: 39-003-0009 (Allen County)

Year	1-Hr Annual Mean (ppm)	3-Yr Average of 1-Hr Annual Mean (ppm)
2025	0.004	0.003

O_3 Monitoring Results: 39-003-0009 (Allen County)

Year	8-Hr 4th Highest (ppm)	3-Yr Average of 8-Hr 4th Highest (ppm)
2025	0.066	0.067

Topic: Air Quality Analysis

Comment 9: Multiple commenters requested that the agency conduct a comprehensive cumulative impact analysis for the proposed project. Commenters asked that the cumulative emissions from all existing, permitted, and reasonably foreseeable industrial sources be considered and ***air dispersion modeling***, such as AERMOD or an equivalent tool be required. In addition, commenters expressed concern that even if the project meets applicable NAAQS on an individual basis, incremental increases in nitrogen oxides could contribute to regional ozone formation and cumulative air quality impacts. Commenters further referenced ***Ohio Administrative Code (OAC) 3745-31-05(A)(1)***, stating that the permitting record must demonstrate that emissions under realistic operating conditions will not interfere with attainment or maintenance of ambient air quality standards.

Response 9: Ohio EPA's air permitting process is designed to ensure that emissions from permitted facilities do not cause or contribute to violations of the NAAQS. Under Ohio's permitting framework, the requirements of OAC 3745-31-05(A)(1) are partially implemented through established dispersion modeling programs – specifically state allowable impact modeling and air toxics modeling as specified in ***Ohio's Engineering Guide #69***, as well as modeling conducted under federal Prevention of Significant Deterioration/New Source Review (PSD/NSR) programs as specified in U.S. EPA Guideline on Air Quality Models (***Appendix W of 40 CFR Part 51***), when potential emissions trigger the requirement for modeling.

The projected emissions from this project did not exceed the regulatory levels that would trigger PSD/NSR modeling, which includes cumulative impact analysis. Because the project remained below these thresholds, the broader modeling analyses requested by commenters are not required under Ohio's permitting framework.

Comment 10: Multiple commenters indicated that the purpose, scope, and results of the modeling for NOx are unclear and inquire why other pollutants were not modeled.

Response 10: Air dispersion modeling is an evaluation technique used to characterize pollution within a defined area resulting from the operation of a source or group of sources. The permitted amount of nitrogen dioxide (NO_X or NO_2) emissions required state-only dispersion modeling (computer modeling). Predicted NO_2 concentrations were compared to the annual generally acceptable incremental impact (GAII). Ohio EPA's annual GAII for NO_2 are one-half of the PSD increments set by ***OAC 3745-31-11*** to maintain attainment of the NAAQS. The results and standard for dispersion modeling are in the following table:

Pollutant/Averaging Period	GAII ($\mu g/m^3$)	Modeled Results ($\mu g/m^3$)	Exceeds GAII?
NO_2 Annual	12.5	11.66	No

During the permit review, Ohio EPA considers whether the proposed location meet federal air quality standards. If the area's air quality does not meet standards, stricter permitting requirements may apply. All of Allen County is designated in attainment for all NAAQS.

The expected emissions of particulate matter, carbon monoxide, sulfur dioxides, and volatile organic emissions rates are not significant enough to require dispersion modeling.

Comment 11: Commenters suggested air toxics modeling was improperly exempted pursuant to ***Ohio EPA's Engineering Guide #70***. This permit allows the generators to combust hydrotreated vegetable oil (HVO), which is not a fossil fuel, therefore this exemption is improperly justified.

Response 11: Ohio EPA agrees that HVO is not a fossil fuel and that the exemption does not apply. Air toxics modeling is required when emissions exceed an established threshold, typically, one ton per year per pollutant for the project. Ohio EPA reviewed the air toxics in accordance with Engineering Guide #69. HVO is an extremely clean fuel and emissions factors from AP-42, Section 3.4, Table 3.4-3 were used to conservatively calculate emissions. Ohio EPA reviewed emissions data which indicated that there will be less than one ton per year from all the engines for all toxic pollutants combined. Therefore, air toxics modeling is not required.

Comment 12: What is the modeled increase for $PM_{2.5}$ concentrations at nearby residential locations? Was air dispersion modeling used to assess any particulate emissions from the cooling towers?

Response 12: No modeling was conducted for $PM_{2.5}$ or PM_{10}. The particulate emissions from the entire project are below the state and federal modeling thresholds of 10 tons per year for $PM_{2.5}$ and 15 tons per year for PM_{10}. State-only permit restrictions limit annual particulate emissions from the cooling towers to approximately 4 tons per year for PM_{10} and 1.4 tons per year for $PM_{2.5}$.

Comment 13: How does the agency evaluate the combined impact of a large number of co-located combustion sources. Does the current air dispersion modeling account for the simultaneous operation of all 115 generators? What modeling has been conducted for extended outage scenarios?

Response 13: Emissions from the operation of emergency engines during emergency scenarios are considered intermittent. State and federal modeling guidelines do not require certain types of intermittent emissions to be included in compliance demonstrations for the 1-hour NO_2 standard under these circumstances. This is further clarified in U.S. EPA's ***Tyler Fox Memorandum*** dated March 1, 2011.

Comment 14: What is the projected localized heat island effect from this facility? How will increased temperature affect ozone formation and secondary air pollution? Is building downwash accounted for in the modeling?

Response 14: The agency is not aware of potential localized heat island effects associated with the proposed data center. Modeling methodology currently does not have the capability to-account for this potential localized impact. Building downwash, where wind flowing over a structure can create negative pressure that pulls down emissions, is accounted for in the modeling.

Topic: Transparency and Public Process

Comment 15: If the permit is approved with substantial redacted data, how does Ohio EPA intend to satisfy the clean air act requirement for meaningful public participation?

Response 15: Public participation is a key component in Ohio EPA's permitting process. The permit was issued draft to seek input from the community on the permit terms and conditions. Our March 11 public meeting regarding the draft air permit was published in our ***Weekly Review*** online on Feb. 9. In addition, the community update announcing the public meeting went out to our Allen County interested parties list on Feb. 18, 2026. Following the meeting, the comment period was extended to March 25 to ensure that the community had sufficient time and resources to ask questions and provide comments.

Comment 16: Several commenters expressed concern that the engine type and size, quantity of fuel burned, cooling tower specifications, and the associated emissions data is considered trade secret per ***Ohio Revised Code Section 3704.08***. Who bears the burden of proof that this information is a trade secret? What concrete evidence did the applicant provide to justify this claim? Commenters requested that Ohio EPA make the engine size and other information publicly available before issuing the permit.

Response 16: Ohio EPA reviews every air permit application in full. The agency receives the complete application and all supporting information from the company.

In some cases, companies request that certain technical details be treated as Confidential Business Information (CBI) or trade secrets. When that happens, the company submits both the full application and a separate public version with the requested CBI redacted.

Ohio EPA's legal staff reviews the request to confirm if the company submitted a valid Trade Secret Request under Ohio law. If confirmed, Ohio EPA manages the proprietary information as trade secret confidential, and a redacted version of the application becomes available to the public.

Ohio EPA has access to all information submitted as part of the permit application and uses the full application when conducting its technical review.

Please note, under the Trade Secret Rule, the company submitting the request bears the burden of proving that the proprietary information they are seeking to protect meets the definition of trade secret confidential, should the request be challenged in court.* (*Rule 3745-34-03 - Ohio Administrative Code | Ohio Laws***)

Because the information redacted is trade secret confidential, Ohio EPA cannot release it to the public.

Comment 17: Does Ohio EPA sign non-disclosure agreements (NDAs)?

Response 17: Ohio EPA representatives do not sign NDAs but do honor trade secret requests in a manner consistent with the state trade secret laws and rules.

Comment 18: Several commenters asked why the public should believe that Ohio EPA's actions represent real protection for the community.

Response 18: Ohio EPA's mission is to enforce environmental regulations that protect human health and the environment within the state of Ohio. Ohio EPA's laws and rules are intended to work in concert with the federal laws and rules established by Congress and U.S. EPA.

As part of the permitting process, all state and federal rules are reviewed, and all applicable requirements are incorporated into a permit. The agency cannot issue a permit if it does not comply with all applicable rules and regulations.

Additionally, the agency cannot deny a permit if a company can comply with all applicable rules and regulations. Any action taken by the director of Ohio EPA can be appealed to the ***Environmental Review Appeals Commission***. This independent group reviews the agency's actions to ensure they comply with Ohio's environmental regulations.

Comment 19: Several commenters indicated that Ohio EPA cannot issue a permit with unknown information, including the specific generators that are being installed.

Response 19: The permit application included example engine models, sizes, and emissions data so Ohio EPA could identify all applicable rules and set the required emission limits and other conditions. Once the company chooses the actual engine make and model, it must submit the final specifications to Ohio EPA. Ohio EPA will review the information to confirm the engine meets the permit requirements. If the final engine differs in a way that affects compliance, the company will need to apply for a permit modification.

Comment 20: Will all emissions and monitoring data be publicly accessible?

Response 20: The public can access the company's fee emission reports and other compliance reports by submitting a ***public records request*** in addition to accessing information on Ohio EPA's ***online eDocument search***.

Comment 21: Several commenters asked if Ohio EPA would allow independent third parties to review the trade secret application before a permit is granted or used to verify the compliance status of the facility.

Response 21: Ohio EPA cannot allow a third party to review information that the company has requested to remain a trade secret. Ohio EPA has sole discretion to enforce the environmental laws of the state of Ohio, including reviewing applications, issuing permits, and taking formal enforcement action.

Comment 22: How will Ohio EPA ensure that the company is complying with all environmental regulations?

Response 22: Bistrozzi must follow all Ohio EPA rules and permit conditions. Ohio EPA checks compliance by inspecting the facility, reviewing data, and evaluating required reports. The agency can increase inspection frequency or on-site presence if the facility has compliance issues or if complaints are received.

Comment 23: Several commenters asked about Ohio EPA's compliance and enforcement process. What agency will be responsible for enforcement? What penalties will apply for non-compliance, and are they sufficient to ensure accountability? Can a facility be shut down?

Response 23: Ohio EPA will take appropriate measures to enforce the requirements of any permit. This includes conducting inspections, reviewing compliance reports, and investigating complaints. When permit violations occur, the agency works to bring the facility/applicant into compliance. Enforcement typically begins with a notice of violation (NOV). This formal enforcement action serves to identify noncompliance and initiate corrective action. In cases where it is warranted, Ohio EPA may consider enhanced enforcement measures. The level of enforcement can escalate based on the duration and severity of the issues.

Comment 24: Multiple commenters expressed concern regarding the compliance history of other facilities in Allen County. One commenter asked if Ohio EPA is aware of violations at other data centers.

Response 24: The compliance history of other facilities in Allen County is outside of Ohio EPA's air permitting focus for this facility. The permit, as written, will include all the necessary requirements to ensure that Bistrozzi is aware of its obligations under the law. To view NOVs at other Ohio data centers, search for them on Ohio EPA's ***online eDocument search***. NOVs issued to other data centers are not considered in the air permitting process.

Comment 25: Will the public be notified if there are changes made to the permit?

Response 25: A public notice is issued with any permitting action. All public notices can be found on Ohio EPA's ***public notice webpage***. The public can also ***sign up*** to receive a weekly email listing all the permit actions in Ohio by county.

Comment 26: Multiple commenters expressed concern regarding the high level of self-monitoring in the permit and suggested a higher frequency of inspections, reporting, testing and the use of continuous monitoring equipment on some or all the engines.

Response 26: Monitoring and reporting by the facility is one way Ohio EPA checks compliance with environmental laws. Many Clean Air Act regulations, including ***40 CFR Part 60 Subpart IIII***, require facilities to track their operations and report any deviations from permit limits. Ohio EPA also conducts inspections and responds to complaints. Missing or inconsistent records can lead to a notice of violation, which is a public record. Continuous emissions monitors are not practical for equipment that operates only rarely.

Comment 27: Multiple commenters expressed concern regarding the "rush" request for the project and that in turn resulted in an insufficient review period for Ohio EPA to make appropriate determinations about the permit.

Response 27: Ohio law gives the agency up to 180 days to act on a complete permit application. Ohio EPA reviews every application with the same technical rigor to ensure compliance with all regulations.

Bistrozzi submitted its initial application on 10/19/25. After the first technical review, Ohio EPA requested revisions. A second review, including modeling, was completed after the revised application was submitted on 12/2/25. Ohio EPA determined the application met all requirements for issuing the permit. To ensure all rules were properly addressed, the agency also reviewed similar permits, relevant federal regulations, and available online data.

Topic: Permitting and Permitting Process

Comment 28: Please explain Ohio EPA's air PTI permitting process.

Response 28: Companies that operate air pollution sources are required to meet all applicable air pollution regulations in the state of Ohio. For sources with emissions exceeding certain thresholds, an ***air permit*** is typically required. To obtain a permit, an application is submitted to Ohio EPA. Ohio EPA reviews the application and notifies the applicant if additional information is needed. Once the agency deems the application complete, air permitting experts process it and issue a draft air PTI or a direct final PTI. If the application provides information on each source, including detailed process and emission information, and meets state and federal standards, Ohio EPA issues the permit. An Ohio EPA air permit is a legally binding document that authorizes industrial facilities to construct or operate equipment that emits air pollutants. It limits emissions, dictates operating practices, and mandates monitoring, testing, and record-keeping to ensure compliance with state and federal laws.

Comment 29: Several commenters were concerned that Bistrozzi is avoiding stricter requirements by taking "synthetic minor" restrictions.

Response 29: Multiple federal rules (***PSD***, ***MACT***, ***TV***) categorize facilities as "major" or "minor" based on their potential emissions, including any synthetic minor restrictions that are part of a federally enforceable permit. Synthetic minor restrictions may allow the company to remain below the "major" designation and therefore, not subject to certain rules. However, the synthetic minor restrictions require strict monitoring, recordkeeping, and reporting of actual operational practices to ensure that the company remains a "minor" source. This approach effectively reduces emissions from the facility. This is a common practice allowed by U.S. EPA as it provides industry with flexibility while still establishing realistic and enforceable environmental requirements.

Comment 30: The permit appears to rely on manufacturer design specifications as the basis for the emission-rate formulas without explaining why those values are sufficiently representative and enforceable.

Response 30: Emergency engines are certified by the manufacturer to meet the emission limitations in 40 CFR Part 60 Subpart IIII. After reviewing information submitted by the manufacturer, including multi-load emissions information, U.S. EPA will issue a certificate of conformity for the manufacturer's engine models. These certified emission values are representative and can be relied upon with confidence to set emission limits and assess compliance.

Comment 31: The draft PTI does not demonstrate that the monitoring and record-keeping provisions are sufficient for a facility, particularly where compliance depends on aggregated calculations derived from multiple operational variables. In addition, the "synthetic minor" classification appears to rely heavily on assumed usage patterns rather than enforceable real-world conditions.

Response 31: The permit does have the necessary recordkeeping and reporting requirements in place to track operating hours, the type of operation, and the associated emissions expected. Tracking this information is sufficient to determine compliance with the existing permit limits. The approach taken in this permit is consistent with those previously approved by U.S. EPA in Ohio. For further information, please refer to U.S. EPA's ***Limiting Potential to Emit (PTE) & Synthetic Minor Sources***.

Comment 32: Several commenters asked why alternative energy sources (e.g., solar, natural gas, geo-cooling) are not required to be reviewed for this project or required to be reviewed later.

Response 32: Ohio EPA does not dictate what type of fuel is used in emergency engines or require that companies do research to determine if alternative energy sources are currently available. Our role is to verify that the proposed project meets all state and federal air pollution regulations.

Comment 33: What volatile organic compounds (VOC) monitoring is required for the engines?

Response 33: No VOC monitoring is required for the engines due to their limited VOC emissions. As part of the allowable NOx emission limits, the engines have a certified non-methane hydrocarbon emission rate that is comparable to VOC.

Comment 34: What VOC monitoring is required for the storage tanks? Are VOC emission controls required on the storage tanks, and what specific compounds will be monitored? What specific vapor control systems will be installed and monitored during tanker truck fuel transfers to prevent volatile organic emissions? Are Stage II vapor recovery systems or equivalent controls required for all fuel transfers? How frequently will vapor control equipment be inspected and by whom? What are the permitted emissions limits, specifically during fuel delivery operations?

Response 34*:* Most of the tanks at this facility are "belly tanks" that will sit directly below each engine and have a capacity of 1,000 to 6,000 gallons. The potential VOC emissions from the storage tanks are extremely small--0.41 tons per year combined for all storage tanks. As such, the storage tanks are considered de minimis and have no permitting requirements.

Comment 35: How often will the cooling towers be running? What is the permitted $PM_{2.5}$ discharge from cooling tower drift?

Response 35: Permitted cooling tower PM_{10} and $PM_{2.5}$ emissions are 0.11 tons and 0.04 tons per year, respectively, for each emissions unit, which equates to approximately 4.0 tons PM_{10} and 1.4 tons $PM_{2.5}$ for all cooling towers combined. Although a high level of redundancy will be built into the cooling systems, at least some of the cooling towers will run continuously.

Comment 36: A commenter suggested the record does not explain the basis for key assumptions for the cooling tower emissions, including drift loss rates or PM fractions, nor does it identify how these assumptions will be verified.

Response 36: The method for calculating particulate emissions from cooling towers is well understood, as is the control efficiency from drift eliminators. The permittee provided detailed calculations as part of the permit application. The permit requires the units to employ high-efficiency drift eliminators, achieving a "drift loss" of 0.001 percent or less. The calculations in the compliance section of the permit provide the basis for the drift loss rates and specify the exact methodology for calculating the drift loss rates and emissions. The emissions from the cooling towers will be demonstrated using actual measurements of solids in the water and water usage rates.

Comment 37: The draft PTI does not demonstrate compliance with OAC 3745-31-05(D)(2)(c), which requires "adequate and enforceable methods" for establishing compliance. The permit does not specify how the load will be measured, what instruments will be used, what data systems will be required, or how load classifications will be recorded. What criteria are used to determine whether the unit is operating above or below 25% load?

Response 37: Ohio EPA agrees that the permit should include additional details on how engine load will be measured and recorded. The PTI has been changed to require that the company provide additional clarification on the identification of load ranges when the engine choice has been made. The Title V operating permit will subsequently include the additional parameters necessary to determine how the load range is identified and recorded.

Comment 38: Once a permit is issued, can it be revised? When is a permit review mandated? Would the community be notified of any changes to the permit?

Response 38: Permits can be revised when needed. Permits are revised for various reasons, including a proposed expansion, to ensure compliance. A review would be completed, and if necessary, a revised permit will be issued before any changes are made to the operation. Compliance issues may also require changes to the permit. All permitting actions are ***public noticed***. The public can also ***sign up*** to receive a weekly email listing all permit actions in Ohio, organized by county.

Comment 39: What dust suppression and fugitive emission controls are required during the construction phase? How is Ohio EPA monitoring the pre-construction activities identified in ***OAC 3745-31-33***? What are the projected $PM_{2.5}$ and PM_{10} emissions during construction? How will diesel emissions from construction equipment be mitigated?

Response 39: During construction, there are no specific requirements in the air permit for diesel emissions or dust. Emissions from construction operations are not required to be quantified or included in a permit. Although construction activities identified in OAC Rule 3745-31-33 are allowed during the initial permit process, construction companies must comply with the nuisance rules specified in ***OAC 3745-15-07***. Ohio EPA representatives have observed the site in its current state and will continue to maintain a presence through all steps in the process. Members of the community are welcome to ***contact us*** with any questions or concerns regarding pre-construction activities.

Comment 40: Will this facility be classified as a major source under Clean Air Act Title V permitting requirements? How do these requirements align with the requirements associated with the PTI?

Response 40: Yes, Bistrozzi will be a major for Title V. Title V permitting requires major sources of air pollution to consolidate all air-related requirements into a single, comprehensive operating permit to help ensure compliance with all permit obligations at a given facility. Except for requirements specifically associated with the initial construction, all emission limitations, monitoring, and record-keeping requirements are transferred to the Title V permit. Title V permit applications must be submitted within 12 months of the commencement of operations. Prior to issuance of the Title V permit, the Title V application and existing PTI are reviewed to ensure the Title V permit meets all necessary requirements.

Comment 41: What are the total projected annual emissions (NOx, $PM_{2.5}$, PM_{10}, VOCs, CO, and hazardous air pollutants)? What is the projected worst-case emissions scenario during extended power outages?

Response 41: The facility is permitted to emit 235.62 tons of NOx, 96.06 tons of CO, approximately 4.0 tons of PM_{10}, and 1.4 tons of $PM_{2.5}$ annually. These annual limits effectively cover the facility's worst-case emissions and serve as the facility's worst-case emissions. No annual limits are established for VOCs or for particulate matter on the engines; however, both values at maximum operating rates would be less than 10 tons per year for all permitted units. SO_2 and hazardous air pollutants (HAPs) emissions are both less than 1 ton per year for the entire facility. There is also a small quantity of emissions from the exempt sources at the facility.

Comment 42: The monitoring planned for this facility tests for several sizes of particulate matter, but does not identify the matter. Isn't this important given different matter has varying health related issues?

Response 42: Ohio EPA has no information suggesting any measurable amount of hazardous particulate matter, such as metals, associated with the operations of the cooling towers or diesel engines.

Comment 43: One commenter requested that Ohio EPA require the permittee to submit the monthly records mandated in Permit Condition B.4.b.1. which detail the number of gallons of fuel used by emissions units P001 through P115 while operating.

Response 43: The annual emission limitations are based on hours of operation at certain loads, not the number of gallons of fuel used. Ohio EPA can request a review of the operational records at any time.

Comment 44: How was it determined that the data center can emit between 100 and 500 single pollutant emissions?

Response 44: The potential emissions from this facility are based on manufacturer data and federal guidance on operating hours. Ohio EPA reviewed and confirmed the accuracy of the calculations presented in the permit application, which were then used to establish the permit's annual limits.

Comment 45: What is being done to mitigate electromagnetic fields (EMF) radiation coming from the facility?

Response 45: The regulation of EMF radiation is outside the scope of this permit. Ohio Department of Health has a ***study*** on EMF and health.

Comment 46: The proposed operational limits lack technical plausibility. The assertion that testing and maintenance for 115 individual generators can be consolidated in a manner consistent with the proposed annual hour restrictions is not supported by industry practice or independent verification.

Response 46: Ohio EPA disagrees with this assertion. The U.S. EPA has reviewed and agreed with the proposed operational limits. The permitting approach has been used in other permits throughout the state for many years, including at data centers currently operating.

Comment 47: The permit record does not appear to adequately address short-term emissions events associated with generator testing or emergency startup scenarios.

Response 47: Ohio EPA disagrees. The permit lists the hourly emission rates for both low-load (≤ 25%) and high-load events. The company is required to track which load condition each engine is operating under whenever an engine is running. Ohio EPA has the right to request that a company test and demonstrate that the manufacturer's emissions rates are met.

Topic: Diesel Engine Emissions and Operations

Comment 48: Commenters suggested that Best Available Technology (BAT) requirements in the draft PTI do not demonstrate compliance with OAC 3745-31-05(A)(3) because it does not include sufficient supporting analysis. Further, it was suggested that BAT for NOx could be more stringent, including technologies such as enhanced controls (e.g., Selective Catalytic Reduction [SCR] or diesel particulate filters), if not Tier 4 technology. What make and model, and emissions control technology are required for Tier 2 generators?

Response 48: US EPA recently reviewed the federal regulations (40 CFR Part 60 Subpart IIII) and determined that the 2010 performance standards for emergency engines remain acceptable. No specific make, model, and emissions control technology is required for Tier 2 engines, but they must comply with all applicable state and federal rules. Tier 2 engines are designed and certified by the manufacturer to meet the emission limitations in 40 CFR Part 60 Subpart IIII. Additionally, as specified by rule, compliance with ***40 CFR Part 63*** Subpart ZZZZ is achieved through compliance with 40 CFR Part 60 Subpart IIII. BAT requirements were reviewed and include compliance with all applicable federal rules as well as modeling for NOx. Applicable federal standards are the basis for the BAT determinations in this permit.

Comment 49: One commenter indicated the Bistrozzi permit should require periodic testing on the engines like what is required in permits issued in Nebraska.

Response 49: Ohio EPA has reviewed permits issued by the Nebraska Department of Water, Energy, and Environment that require engine testing. While emission rates can vary between similar sources, Ohio EPA does not believe this potential variability alone should trigger testing, especially since the engines may operate infrequently. Ohio EPA relies upon U.S. EPA certifications to set emission limits and assess compliance. By including "if required" in the permit's testing sections, Ohio EPA keeps the right to require testing if needed. Factors like engine age, how often and how long it's used, and results of visual inspections will be considered if testing is needed. For now, no testing is required through the PTI, although Ohio EPA retains the authority to conduct emissions testing in the future.

Comment 50: The draft PTI does not demonstrate that the anticipated operation of the facility will remain within the federal definition of "emergency operation." What is the definition of "emergency" operation in the permit? What is the maximum permitted annual hours of operation for each generator, and how will compliance be verified? What are the real-time monitoring and public reporting requirements that will ensure generators are not operated beyond emergency use parameters? If generators are used for demand response or grid support (not just emergencies), does the permit cover those emissions?

Response 50: 40 CFR Part 60 Subpart IIII does not define what constitutes an "emergency" but it does provide the following example: the production of "power for critical networks or equipment (including power supplied to portions of a facility) when electric power from the local utility (or the normal power source, if the facility runs on its own power production) is interrupted." 40 CFR Part 60 Subpart IIII explicitly states what circumstances do not constitute an "emergency", which includes maintenance, allowances to supply power to the grid to ensure reliability for the infrastructure, and peak shaving.

Per 40 CFR Part 60 Subpart IIII, there is no limit on the use of emergency stationary internal combustion engines in emergency situations. However, regardless of the frequency or duration of electrical outages, the draft PTI does not allow the permittee to operate the engines for an unlimited number of hours, as the emissions from all operating scenarios count toward existing permit limits.

40 CFR 60.4211(f) establishes the parameters that must be met for an engine to be considered an emergency stationary internal combustion engine (ICE), including a 100-hour limitation on operating hours in non-emergency situations. Federal regulation 40 CFR 60.4211(f)(3) establishes specific parameters under which the engines can use a 50-hour allowance to supply power to the grid to ensure reliability to the infrastructure. Peak shaving, when not done as specified in 40 CFR 60.4211(f)(3), but strictly as a financial arrangement, is prohibited.

Term C.1.b)(2)c. of the draft permit explicitly states that the proposed sources must operate within compliance of "40 CFR 60.4211(f) in order to be considered an emergency stationary ICE under Part 60, Subpart IIII."

The permit has the necessary recordkeeping and reporting requirements in place to track operating hours and the type of operation that occurred. The engines have non-resettable hour meters that are checked by Ohio EPA personnel during inspections. If an engine no longer meets the emergency engine requirements, the specific circumstances are required to be reported to Ohio EPA for evaluation and may require modifying the existing permit or submitting a new permit application.

Comment 51: Is the potential to emit based on 100 hours of operation?

Response 51: The potential to emit is based on 500 hours of operation per year. This approach follows the U.S. EPA memorandum ***"Calculating Potential to Emit (PTE) for Emergency Generators"*** (Sept. 6, 1995).

Comment 52: How many hours per year are the generators expected to be operated for testing and maintenance?

Response 52: Based on operations at similar facilities in Ohio, testing and maintenance are typically no more than 12 hours per year per engine.

Comment 53: Commenters asked how Ohio EPA can prove the use of Hydrotreated Vegetable Oil (HVO) as fuel is equivalent to the use of diesel from an environmental standpoint.

Response 53: All available information on the use of HVO as a replacement fuel indicates that HVO is an extremely clean fuel and superior to diesel from an environmental standpoint. The company provided documentation from two different engine manufacturers stating their approval for the use of alternative diesel fuels, including HVO, in the engines. Once the final engine designs have been

selected, Ohio EPA will verify with the manufacturer that HVO fuel can be used without any modifications to the engine. If the manufacturer does not approve the use of HVO as an alternative fuel, a permit modification would be required.

Comment 54: What $PM_{2.5}$ limits are established in the permit for the generators?

Response 54: No specific $PM_{2.5}$ limit is established in the permit. The particulate limit for the engines is established under 40 CFR Part 60 Subpart IIII, with a performance standard of 0.20 grams PM/kW-hr, which effectively restricts $PM_{2.5}$.

Comment 55: One commenter suggested that the permit restrict the maximum number of engines that can be operated at one time during routine testing, as they are described in the Tyler Fox Memorandum. The same commenter also suggested that Ohio EPA limit non-emergency operating hours to between 7 a.m. and 7 p.m. Both were proposed to minimize impacts, with consideration of meteorological conditions that maximize air dispersion and thus limit ground-level concentrations of NO_2 from the emergency engines.

Response 55: There is no legal requirement to limit the number of engines that can be operated simultaneously during testing or to place restrictions on operations for the purpose of maximizing air dispersion. On a per-engine basis, NOx emissions from testing scenarios are substantially lower than when the engines are operating at full load. Ohio EPA can observe maintenance testing events and require further modeling to ensure that NOx emissions do not have a significant negative impact. Ohio EPA can require changes in scheduling if there are excessive impacts on ambient air quality.

Comment 56: What are the emissions limits on low-sulfur diesel fuel and HVO?

Response 56: The ultra-low sulfur diesel and HVO fuel is required to meet a maximum sulfur concentration of 15 ppm (0.0015% sulfur by weight) and either a minimum cetane index of 40 or a maximum aromatic content of 35 volume percent. The engines are also required to meet the following standards: 0.20 grams PM/kW-hr, 6.4 grams NOx + NMHC/kW-hr, and 3.5 grams CO/kW-hr.

Topic: Water Use and Wastewater

Comment 57: Commenters express concern about the environmental impact of the proposed facility's water use. They write that the facility, along with existing industries, may consume more water than the watershed can replenish. Commenters indicated construction activities have impacted private drinking water wells.

Response 57: Impacts to private drinking water wells are managed by Ohio Department of Health and the local health department. Water withdrawal concerns are managed by ***Ohio Department of Natural Resources*** (ODNR).

Comment 58: Commenters had several concerns about wastewater discharges from the facility. How will Ohio EPA monitor for *Legionella* or other pathogens in the cooling water discharge? Where and how is this wastewater going to be removed from this facility? Commenters also express concern that wastewater will worsen local water quality. They note that water permit issues have not received the same public attention as air permits.

Response 58: If a data center does not send its wastewater to a sanitary sewer, an Ohio EPA wastewater discharge permit (also called a National Pollutant Discharge Elimination System, or NPDES) may be required for cooling-water blowdown discharges. If sewer service is unavailable or insufficient, an NPDES permit may authorize the data center to discharge to a nearby stream. This wastewater discharge permit requires routine monitoring and may require cooling ponds or other treatment to address issues such as water temperature or total dissolved solids.

Data centers using air-based or closed-loop cooling may still generate liquid waste that must be managed appropriately.

Potential water quality impacts are not in the scope of the air permit.

Topic: Power Grid

Comment 59: Commenters worry that the facility's electricity demand could strain an already stressed power grid, potentially contributing to higher residential electric bills, rolling blackouts, or increased reliance on diesel generators. Others argue that the region's infrastructure is not prepared for the added load and that more research is needed before any permit is approved.

Response 59: Ohio EPA is not involved in decisions on power infrastructure needs. Residents should contact their local electric provider or the ***Public Utilities Commission of Ohio***.

Topic: Wildlife, Animals, Agriculture, and Ecosystems

Comment 60: Commenters are concerned about the proposed data center's impacts on ecosystems, watersheds, wildlife, and farmland. They are concerned about air emissions from cooling towers and power sources impacting livestock and depositing on farm crops. The comments also focus on stormwater runoff and wastewater impacting the watershed and soil quality.

Response 60: To ensure wildlife is not impacted, Ohio EPA consults with ODNR and other agencies when drafting a permit that would affect waters of the state. The agency does not anticipate that the facility's air emissions will impact wildlife, agriculture, or ecosystems.

Ohio EPA Division of Surface Water administers the ***Construction Stormwater Program*** under the federal Clean Water Act. Construction sites disturbing one acre or more must obtain coverage. Facility owners must also prepare a Stormwater Pollution Prevention Plan, submit a Notice of Intent, and receive Ohio EPA approval before starting work.

Some data center projects may impact streams, wetlands, or lakes. Under Clean Water Act Sections 401/404, any activity placing dredged or fill material into waters of the U.S. requires state and federal ***review and permitting***.

Currently, Ohio EPA has issued Bistrozzi an NPDES General Permit for Construction Stormwater issued to Turner Construction on Nov. 10, 2025 - 2GC08468. Bistrozzi (Project BOSC) applied for and later withdrew an application for impacts to a level 2 isolated wetland. After withdrawing that application, they applied for and were issued a level 1 isolated wetland permit.

Topic: Noise

Comment 61: Commenters express concern about noise from the facility, which would diminish quality of life, limit outdoor activities, disrupt sleep, and cause stress, noise sensitivity, and tinnitus. Commenters express concern that the noise would not comply with local ordinances and ask whether any formal noise-impact studies would be conducted.

Response 61: While we understand that noise is a concern at facilities, it is outside of Ohio EPA's permitting authority. Often, local municipalities have noise ordinances. For noise concerns or questions, please reach out to ***American Township***.

Topic: Grave Site

Comment 62: One commenter indicated that there is a burial site on the property. The commenter requested information about the site's future.

Response 62: Ohio EPA requested the company to contact the commenter directly to address this concern.

Topic: Additional Comments Unrelated to Air Permit

Comment 63: Commenters expressed concern for topics unrelated to the proposed air permit, such as local drought conditions, flooding, zoning issues, property values, better venues for public meetings, construction activities, and a lack of trust in officials and the permitting process. Some residents request participation from people who have published articles about data centers. Overall, the submissions reflect significant apprehension with the proposed facility.

Response 63: These concerns are outside of Ohio EPA's permitting authority. We understand how important these issues are to the local community and encourage residents to engage with their local municipalities and county resources to address them.

Regarding comments about the public meeting location for the draft air permit, Ohio EPA typically seeks a hearing location as close as possible to the proposed facility site and one that accommodates the anticipated crowd. We underestimated attendance for this hearing based on public inquiries to Ohio EPA. To ensure the community had enough time to submit comments or concerns about the draft permit, Ohio EPA provided a 48-day comment period, which is two additional weeks beyond what is required.

Topic: General Comments Against the Project

Comment 64: Many residents oppose the proposed data center, citing concerns about its environmental, economic, and quality-of-life impacts. Many believe the facility would strain local water resources, reduce farmland, raise household utility costs, harm property values, and threaten local wildlife habitats. Others link their concerns to broader skepticism about data centers, artificial intelligence systems, and data security. Several note that similar facilities create few permanent jobs, raising doubts about economic benefits, especially with extended tax abatements and increased infrastructure demands.

Response 64: While we appreciate community feedback, Ohio EPA must issue permits that comply with Ohio's environmental laws and regulations. The draft air permit does meet those requirements. We cannot deny a permit based on local popularity for the facility or business sector.

End of Response to Comments

Ohio Environmental Protection Agency

FINAL
Division of Air Pollution Control
Permit-to-Install
for
Bistrozzi LLC

Facility ID:	0302022054
Permit Number:	P0138965
Permit Type:	Initial Installation
Issued:	05/28/2026
Effective:	05/28/2026

Ohio Environmental Protection Agency

Division of Air Pollution Control

Permit-to-Install

for

Bistrozzi LLC

Table of Contents

Authorization

Facility ID:	0302022054
Facility Description:	Facility
Application Number(s):	A0080713, A0080278
Permit Number:	P0138965
Permit Description:	Installation of a data center with 115 diesel-fired generators and 36 cooling towers.
Permit Type:	Initial Installation
Permit Fee	$71,755.00
Issue Date:	05/28/2026
Effective Date:	05/28/2026

This document constitutes issuance of a Permit-to-Install for the emissions unit(s) identified on the following page to:

Bistrozzi LLC
N Cole Rd. and W Bluelick Rd.
Lima, OH 45801

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Rd.
Bowling Green, OH 43402
(419)352-8461

The above-named entity is hereby granted a Permit-to-Install for the emissions unit(s) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Entered into the Journal of the Director on:

John Logue
Director

Date: 05/28/2026

Authorization (continued)

Permit Number: P0138965

Permit Description: Installation of a data center with 115 diesel-fired generators and 36 cooling towers.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Group Name: Cooling Towers

Emissions Unit ID:	**P120**
Company Equipment ID:	TWR 1-1
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P121**
Company Equipment ID:	TWR 1-2
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P122**
Company Equipment ID:	TWR 1-3
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P123**
Company Equipment ID:	TWR 1-4
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P124**
Company Equipment ID:	TWR 1-5
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P125**
Company Equipment ID:	TWR 1-6
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P126**
Company Equipment ID:	TWR 1-7

Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P127**
Company Equipment ID:	TWR 1-8
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P128**
Company Equipment ID:	TWR 1-9
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P129**
Company Equipment ID:	TWR 1-10
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P130**
Company Equipment ID:	TWR 1-11
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P131**
Company Equipment ID:	TWR 1-12
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P132**
Company Equipment ID:	TWR 2-1
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P133**
Company Equipment ID:	TWR 2-2
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P134**
Company Equipment ID:	TWR 2-3
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

Emissions Unit ID:	**P135**
Company Equipment ID:	TWR 2-4
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P136**
Company Equipment ID:	TWR 2-5
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P137**
Company Equipment ID:	TWR 2-6
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P138**
Company Equipment ID:	TWR 2-7
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P139**
Company Equipment ID:	TWR 2-8
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P140**
Company Equipment ID:	TWR 2-9
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P141**
Company Equipment ID:	TWR 2-10
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P142**
Company Equipment ID:	TWR 2-11
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P143**
Company Equipment ID:	TWR 2-12

Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P144**
Company Equipment ID:	TWR 3-1
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P145**
Company Equipment ID:	TWR 3-2
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P146**
Company Equipment ID:	TWR 3-3
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P147**
Company Equipment ID:	TWR 3-4
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P148**
Company Equipment ID:	TWR 3-5
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P149**
Company Equipment ID:	TWR 3-6
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P150**
Company Equipment ID:	TWR 3-7
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P151**
Company Equipment ID:	TWR 3-8
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

Emissions Unit ID:	**P152**
Company Equipment ID:	TWR 3-9
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P153**
Company Equipment ID:	TWR 3-10
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P154**
Company Equipment ID:	TWR 3-11
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P155**
Company Equipment ID:	TWR 3-12
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

Group Name: Emergency Generator Group

Emissions Unit ID:	**P001**
Company Equipment ID:	GEN 1-1
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P002**
Company Equipment ID:	GEN 1-2
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P003**
Company Equipment ID:	GEN 1-3
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P004**
Company Equipment ID:	GEN 1-4
Superseded Permit Number:	

General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P005**
Company Equipment ID:	GEN 1-5
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P006**
Company Equipment ID:	GEN 1-6
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Company Equipment ID:	GEN 1-7
Emissions Unit ID:	**P007**
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P008**
Company Equipment ID:	GEN 1-8
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P009**
Company Equipment ID:	GEN 1-9
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P010**
Company Equipment ID:	GEN 1-10
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P011**
Company Equipment ID:	GEN 1-11
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P012**
Company Equipment ID:	GEN 1-12
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P013**

Company Equipment ID:	GEN 1-13
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P014**
Company Equipment ID:	GEN 1-14
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P015**
Company Equipment ID:	GEN 1-15
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General Permit Category and Type:	Not Applicable
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Superseded Permit Number:	
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Company Equipment ID:	GEN 1-17
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P018**
Company Equipment ID:	GEN 1-18
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P019**
Company Equipment ID:	GEN 1-19
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P020**
Company Equipment ID:	GEN 1-20
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P021**
Company Equipment ID:	GEN 1-21
Superseded Permit Number:	

General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P022**
Company Equipment ID:	GEN 1-22
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P023**
Company Equipment ID:	GEN 1-23
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P024**
Company Equipment ID:	GEN 1-24
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P025**
Company Equipment ID:	GEN 1-25
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P026**
Company Equipment ID:	GEN 1-26
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
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General Permit Category and Type:	Not Applicable

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General Permit Category and Type:	Not Applicable

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Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

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General Permit Category and Type:	Not Applicable

Emissions Unit ID:	**P098**
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General Permit Category and Type:	Not Applicable
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General Permit Category and Type:	Not Applicable
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Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
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General Permit Category and Type:	Not Applicable
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Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
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General Permit Category and Type:	Not Applicable
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Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
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General Permit Category and Type:	Not Applicable
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General Permit Category and Type:	Not Applicable
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General Permit Category and Type:	Not Applicable
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Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
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Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P114**
Company Equipment ID:	GEN 3-38
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

Emissions Unit ID:	**P115**
Company Equipment ID:	HUBGEN
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

List of Commonly Used Abbreviations

AP-42 = U.S. EPA's Compilation of Air Pollution Emissions Factors	HVLP = high volume, low pressure	PER = Permit Evaluation Report
ASTM = American Society for Testing and Materials	LAER = lowest achievable emission rate	PM = particulate matter
BACT = Best Available Control Technology	lb(s)/hr = pound(s) per hour	PM_{10} = particulate matter with an aerodynamic diameter less than or equal to 10 microns
BAT = Best Available Technology	LDAR = leak detection and repair	$PM_{2.5}$ = particulate matter with an aerodynamic diameter less than or equal to 2.5 microns
CAA = Clean Air Act	LPG = liquefied petroleum gas/propane	ppb = parts per billion
CAM = compliance assurance monitoring	MACT = maximum achievable control technology	ppm = parts per million
CEMS = continuous emissions monitoring system	MAGLC = maximum acceptable ground level concentration	PSD = Prevention of Significant Deterioration
CFC = chlorofluorocarbon	mg/m3 = milligrams per cubic meter	psi = pounds per square inch
CFR = Code of Federal Regulations	MM = million	psia = pounds per square inch absolute
CH_4 = methane	MMBtu = million British Thermal Units	PTE = potential-to-emit
CI = compression ignition	MSDS = material safety data sheet	PTI = Permit-to-Install
CO = carbon monoxide	MSW = municipal solid waste	PTIO = Permit-to-Install and Operate
CO_2 = carbon dioxide	NAAQS = National Ambient Air Quality Standard	PTO = Permit-to-Operate
COM = continuous opacity monitor	NESHAP = National Emission Standard for Hazardous Air Pollutants	PWR = process weight rate
DAPC = Division of Air Pollution Control	NG = natural gas	RACM = reasonably available control measures
DO/LAA = District Office/Local Air Agency	ng/m3 = nanograms per cubic meter	RACT = reasonably available control technology
dscf = dry standard cubic foot	NH_3 = ammonia	RATA = relative accuracy test audit
EAC = emissions activity category	NMHC = non-methane hydrocarbons	RTO = regenerative thermal oxidizer
eDocs = electronic documents database	NMOC = non-methane organic compound	SB265 = Senate Bill 265
ERAC = Environmental Review Appeals Commission	NO = nitrogen oxide	scfm = standard cubic feet per minute
ESP = electrostatic precipitator	NO_2 = nitrogen dioxide	SI = spark ignition
EU = emissions unit	NO_x = nitrogen oxides	SIP = State Implementation Plan
FEPTIO = Federally Enforceable Permit-to-Install and Operate	NSPS = New Source Performance Standard	SO_2 = sulfur dioxide
FER = Fee Emissions Report	NSR = New Source Review	SSMP = startup, shutdown, and malfunction plan
FR = Federal Register	NTV = Non-Title V	TDS = total dissolved solids
GACT = generally achievable control technology	O&M = operation and maintenance	TLV = threshold limit value
GHG = greenhouse gases	OAC = Ohio Administrative Code	TO = thermal oxidizer
gr/dscf = grains per dry standard cubic foot	OC = organic compound	TPH = ton(s) per hour
H_2S = hydrogen sulfide	Ohio EPA = Ohio Environmental Protection Agency	TPY = ton(s) per year
H_2SO_4 = sulfuric acid	ORC = Ohio Revised Code	TSP = total suspended particulates
HAP = hazardous air pollutant	Pb = lead	VE = visible particulate emissions
HCl = hydrogen chloride	PBR = Permit-By-Rule	VMT = vehicle miles traveled
HF = hydrogen fluoride	PCB = polychlorinated biphenyl	VOC = volatile organic compound
Hg = mercury	PE = particulate emissions	WPP = work practice plan
hp = horsepower	PEMS = predictive emissions monitoring system	µg/m3 = micrograms per cubic meter

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under state law only:

(1) Standard Term and Condition A.2.a), Severability Clause

(2) Standard Term and Condition A.3.c) through A. 3.e), General Requirements

(3) Standard Term and Condition A.6.c), Compliance Requirements

(4) Standard Term and Condition A.8., Air Pollution Nuisance

(5) Standard Term and Condition A.9., Reporting Requirements

(6) Standard Term and Condition A.10., Applicability

(7) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install

(8) Standard Term and Condition A.14., Public Disclosure

(9) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(10) Standard Term and Condition A.16., Fees

(11) Standard Term and Condition A.17., Permit Transfers

2. Severability Clause

a) A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

b) All terms and conditions designated in parts B. and C. of this permit are federally enforceable as a practical matter, if they are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the state and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under state law only, only if specifically identified in this permit as such.

3. General Requirements

a) Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification.

b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

c) This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d) This permit does not convey any property rights of any sort, or any exclusive privilege.

e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

4. Monitoring and Related Record Keeping and Reporting Requirements

a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

(1) The date, place (as defined in the permit), and time of sampling or measurements.

(2) The date(s) analyses were performed.

(3) The company or entity that performed the analyses.

(4) The analytical techniques or methods used.

(5) The results of such analyses.

(6) The operating conditions existing at the time of sampling or measurement.

b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:

(1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Northwest District Office.

(2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Northwest District Office. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.

(3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the DO/LAA every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semiannual report, which states that no deviations occurred during that period.

(4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after

reasonable inquiry, the statements and information in the report are true, accurate, and complete.

d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Northwest District Office in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction). The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

6. Compliance Requirements

a) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the appropriate Ohio EPA District Office or contracted local air agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the electronic signature date shall constitute the date that the required application, notification or report is considered to be "submitted". Any document requiring signature may be represented by entry of the personal identification number (PIN) by responsible official as part of the electronic submission process or by the scanned attestation document signed by the Authorized Representative that is attached to the electronically submitted written report.

Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a Responsible Official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

(1) At reasonable times, enter upon the permittee's premises where a source is located, or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

(2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.

(3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

(4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

c) The permittee shall submit progress reports to the Ohio EPA DAPC, Northwest District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

(1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

(2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

7. Best Available Technology

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

8. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Northwest District Office.

b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Northwest District Office. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

10. Applicability

This permit-to-install is applicable only to the emissions unit(s) identified in the permit-to-install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s) not exempt from the requirement to obtain a permit-to-install.

11. Construction of New Sources(s) and Authorization to Install

a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all

Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended once by twelve months if application is made to the Director within a reasonable time before the termination date and the permittee shows good cause for any such extension.

c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update electronically will constitute notifying the Director of the permanent shut down of the affected emissions unit(s).

d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All records relating to any permanently shut down emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

Unless otherwise exempted, no emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31 and OAC Chapter 3745-77 if the restarted operation is subject to one or more applicable requirements.

e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or any other reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

12. Permit-To-Operate Application

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve months after commencing operation of the emissions units covered by this permit. However, if operation of the proposed new or modified source(s) as authorized by this permit would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification of such new or modified

source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d) must be obtained before operating the source in a manner that would violate the existing Title V permit requirements.

13. Construction Compliance Certification

The applicant shall identify the following dates in the "Air Services" facility profile for each new emissions unit identified in this permit.

a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.

b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

16. Fees

The permittee shall pay any fees to Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. Failure to provide the applicable permit fee within 30 days may result in the accrual of substantial interest penalties. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the "Owner/Contact Change" functionality in "Air Services" once the transfer is legally completed. The change must be submitted through "Air Services" within thirty days of the ownership transfer date.

18. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

19. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

B. Facility-Wide Terms and Conditions

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

   a) None.

2. Unless other arrangements have been approved by the director, all notifications and reports shall be submitted through Ohio EPA's eBusiness Center: Air Services online web portal.

3. The Ohio EPA has determined that this facility operates affected sources that are subject to the requirements of 40 CFR, Part 63, Subpart ZZZZ, the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines. Ohio EPA is not accepting the delegation authority to implement and enforce the area source NESHAP standard. The area source NESHAP standard is implemented and enforced by U.S. EPA, Region 5. The promulgated version of this NESHAP standard and the 40 CFR, Part 63, General Provisions may be accessed via the Internet from the Electronic Code of Federal Regulations (e-CFR) website http://www.ecfr.gov/ or by contacting the Ohio EPA, District Office or Local Air Agency.

   The following affected sources are subject to the area source requirements of this NESHAP standard: Emissions unit(s) P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, P037, P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048, P049, P050, P051, P052, P053, P054, P055, P056, P057, P058, P059, P060, P061, P062, P063, P064, P065, P066, P067, P068, P069, P070, P071, P072, P073, P074, P075, P076, P077, P078, P079, P080, P081, P082, P083, P084, P085, P086, P087, P088, P089, P090, P091, P092, P093, P094, P095, P096, P097, P098, P099, P100, P101, P102, P103, P104, P105, P106, P107, P108, P109, P110, P111, P112, P113, P114, and P115.

4. This permit establishes the following terms and conditions pursuant to OAC rule 3745-31-05(D).

   a) Emission Limitations

      (1) NOx emissions shall not exceed 235.62 tons per rolling, 12-month period from emissions units P001 through P115; and

      (2) CO emissions shall not exceed 96.06 tons per rolling 12-month period from emissions units P001 through P115.

   b) Operational Restrictions

      (1) The maximum hours of operation for emissions units P001 through P115 shall be limited by the following formulas for each rolling, 12-month period:

      235.62 tons of NOx ≥

$$\sum_{i=P001}^{P115}\left[\frac{(\text{NOx ER}_{\leq 25\%\ \text{load,i}})(\text{H}_{\leq 25\%\ \text{load,i}}) + (\text{NOx ER}_{>25\%\ \text{load,i}})(\text{H}_{>25\%\ \text{load,i}})}{2{,}000\frac{\text{lb}}{\text{ton}}}\right]$$

      and

      96.06 tons of CO ≥

$$\sum_{i = P001}^{P115} \left[\frac{(\text{CO ER}_{\leq 25\% \text{ load,i}})(\text{H}_{\leq 25\% \text{ load,i}}) + (\text{CO ER}_{> 25\% \text{ load,i}})(\text{H}_{> 25\% \text{ load,i}})}{2{,}000 \frac{\text{lb}}{\text{ton}}} \right]$$

where:

i = each emissions unit, P001 through P115,

$NOx\ ER_{\leq 25\%\ load,i}$ = the NOx emissions rates, in lb/hr, for each emissions unit, i, when operating at less than or equal to 25% load, as provided in Table 1 below:

$NOx\ ER_{>25\%\ load,i}$ = the NOx emissions rates, in lb/hr, for each emissions unit, i, when operating at more than 25% load respectively, as provided in Table 1 below:

Table 1: NOx Emissions Rates

Emissions Units	lbs NOx/hr (≤ 25% Load)	lbs NOx/hr (> 25% Load)
P001-P114	12.15	75.78
P115	13.71	13.71

$CO\ ER_{\leq 25\%\ load,i}$ = the CO emissions rates, in lb/hr, for each emissions unit, i, when operating at less than or equal to 25% load, as provided in Table 2 below:

$CO\ ER_{>25\%\ load,i}$ = the CO emissions rates, in lb/hr, for each emissions unit, i, when operating at more than 25% load respectively, as provided in Table 2 below:

Table 2: CO Emissions Rates

Emissions Units	lbs CO/hr (≤ 25% Load)	lbs CO/hr (> 25% Load)
P001-P114	7.08	17.62
P115	7.72	7.72

$H_{\leq 25\%\ load,i}$ = the number of hours of operation for each emissions unit, i, while operating at less than or equal to 25% load during the rolling, 12-month period

$H_{>25\%\ load,i}$ = the number of hours of operation for each emissions unit, i, while operating at more than 25% load during the rolling, 12-month period

*These emission rates are based on the manufacturer's design specifications as specified in permit application #A0080713, dated 12/02/2025. These emission rates are for both Ultra-low sulfur diesel (ULSD) and renewable diesel fuels such as Hydrotreated Vegetable Oils (HVO), as these are described in conditions C.1.b)(2)d.

c) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain monthly records of the following information:

a. the number of hours of operation for emissions units P001 through P115 while operating at less than or equal to 25% load;

b. the number of hours of operation for emissions units P001 through P115 while operating at more than 25% load;

c. the rolling, 12-month summation of NOx emissions from emissions units P001 through P115, combined, in tons, calculated using the emissions rates specified in B.4.b)(1), Table 1 above; and

d. the rolling, 12-month summation of CO emissions from emissions units P001 through P115, combined, in tons, calculated using the emissions rates specified in B.4.b)(1), Table 2 above.

d) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify:

a. all exceedances of the rolling, 12-month NOx emissions limitation;

b. all exceedances of the rolling, 12-month CO emissions limitation;

c. the probable cause of each deviation (excursion);

d. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

e. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the director (Ohio EPA, DO/LAA).

e) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section a) of these terms and conditions shall be determined in accordance with the following methods:

a. <u>Emissions Limitations</u>

NOx emissions shall not exceed 235.62 tons per rolling, 12-month period from emissions units P001 through P115

CO emissions shall not exceed 96.06 tons per rolling 12-month period from emissions units P001 through P115

<u>Applicable Compliance Method</u>

Compliance with the rolling, 12-month emissions limitations shall be determined in accordance with the monitoring and recordkeeping requirements specified in B.4.c)(1) above.

C. Emissions Unit Terms and Conditions

1. **Emissions Unit Group - Emergency Generator Group: P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, P037, P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048, P049, P050, P051, P052, P053, P054, P055, P056, P057, P058, P059, P060, P061, P062, P063, P064, P065, P066, P067, P068, P069, P070, P071, P072, P073, P074, P075, P076, P077, P078, P079, P080, P081, P082, P083, P084, P085, P086, P087, P088, P089, P090, P091, P092, P093, P094, P095, P096, P097, P098, P099, P100, P101, P102, P103, P104, P105, P106, P107, P108, P109, P110, P111, P112, P113, P114, P115**

EU ID	Operations, Property and/or Equipment Description
P001 -P038	Group 1 Emergency Generators, GEN 1-1 through GEN 1-38
P039-P076	Group 1 Emergency Generators, GEN 2-1 through GEN 2-38
P077-P114	Group 1 Emergency Generators, GEN 3-1 through GEN 3-38
P115	HUBGEN

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) b)(1)l. and d)(7).

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D) [Federally enforceable limitations to avoid NSR]	The NOx emissions from emissions units P001 through P115 combined shall not exceed 235.62 tons per rolling, 12-month period. The CO emissions from emissions units P001 through P115 combined shall not exceed 96.06 tons per rolling, 12-month period. See Facility-Wide Term and Condition B.4.
b.	OAC rule 3745-31-05(A)(3) [BAT for NOx]	Emission units P001 through P114 shall meet the standards established for NOx emissions in 40 CFR, Part 60, Subpart IIII.

		See b)(2)a. through b)(2)c.
c.	OAC rule 3745-31-05(A)(3)(a)(ii)	The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the CO, VOC, PM10, PM2.5 and SO2 emissions from emission units P001 through P114 since the potential to emit for each pollutant is less than 10 tons per year. The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the NOx, CO, VOC, PM10, PM2.5 and SO2 emissions from emission unit P115 since the potential to emit for each pollutant is less than 10 tons per year.
d.	[40 CFR, Part 60, Subpart IIII: stationary emergency compression ignition (CI) internal combustion engine (ICE) greater than 560 kW with a displacement less than 10 liters/cylinder, Model Year 2006 or later] 40 CFR 1039, Appendix I, Table 2 - Tier 2 Emissions Standards	These emission units shall be certified to meet the following emissions standards: 0.20 grams PM/kW-hr 6.4 grams NOx + NMHC/kW-hr 3.5 grams CO/kW-hr See b)(2)a. through b)(2)c. and c)(1).
e.	40 CFR 60.4207(b)	The sulfur content of the diesel fuel burned in these emission units shall not exceed 15 ppm or 0.0015% sulfur by weight. See b)(2)d.
f.	40 CFR 1039.105 (certified by manufacturer)	The exhaust emissions from each engine shall not exceed: 20% opacity during the acceleration mode 15% opacity during the lugging mode 50% opacity during the peaks in either the acceleration or lugging modes See b)(2)b.
g.	40 CFR, Part 60, Subpart A	Table 8 to 40 CFR, Part 60, Subpart IIII- "Applicability of General Provisions to Subpart IIII" identifies which parts of the

		General Provisions in 40 CFR Part 60.1-19 apply.
h.	OAC rule 3745-17-07(A)	Visible particulate emissions from the stacks serving these emission units shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
i.	OAC rule 3745-17-11(B)(5)(b)	Particulate emissions shall not exceed 0.062 lb/MMBtu actual heat input.
j.	OAC rule 3745-18-06(G)	SO_2 emissions from emission units P001 through P114 shall not exceed 0.5 lb/MMBtu actual heat input. See b)(2)e.
k.	OAC rule 3745-110-03	See b)(2)f.
l.	OAC rule 3745-114-01 ORC 3704.03(F)	See d)(7).

(2) Additional Terms and Conditions

a. The emergency stationary compression ignition (CI) internal combustion engines (ICEs) are subject to and shall be operated in compliance with the requirements of 40 CFR, Part 60, Subpart IIII, standards of performance for stationary CI ICE.

b. As specified in 40 CFR 60.4205(b), the emergency stationary CI ICEs have been or shall be purchased certified by the manufacturer to emission standards as stringent as those identified in 40 CFR 60.4202(a)(2), for P115, and 40 CFR 60.4202(b)(2), for P001 through P114, including the Tier 2 standards in 40 CFR 1039, Appendix I for engines greater than or equal to 750 horsepower (560 kW) and the smoke standards as specified in 40 CFR 1039.105.

c. The emergency stationary ICEs must comply with the applicable requirements specified in 40 CFR 60.4211(f) in order to be considered an emergency stationary ICE under 40 CFR, Part 60, Subpart IIII.

d. The emergency stationary CI ICEs shall burn only ultra-low sulfur diesel (ULSD) or renewable diesel fuels such as Hydrotreated Vegetable Oils (HVO), that meets the following conditions:

i. The fuel shall meet the ICE manufacturer's fuel specifications for the specific make and model of engine; and

ii. The fuel shall not contravene the ICE's Tier 2 certification.

iii. The ultra-low sulfur diesel fuel shall meet the following per-gallon ULSD standards, as specified by 40 CFR 1090.305:

(a) A maximum sulfur content of 15 ppm (0.0015% sulfur by weight); and

(b) A cetane index or aromatic contents, as follows:

(i) A minimum cetane index of 40; or

(ii) A maximum aromatic content of 35 volume percent.

e. Pursuant to OAC 3745-18-06(B), stationary internal combustion engines which have rated heat input capacities equal to or less than 10 MMBtu/hr are exempt from OAC rule 3745-18-06(G). Therefore, the requirements of OAC 3745-18-06 do not apply to emissions unit P115.

f. In order to qualify for the exemption found in OAC Rule 3745-110-03(K)(2), these engines shall not be operated in any consecutive 12-month period equal to or exceeding 500 hours of operation. Note that this restriction on the hours of operation does not modify or supersede the hours of operation restriction (for maintenance checks and readiness testing) found in d)(2) of this permit. If an engine operation equals or exceeds 500 hours during any consecutive 12-month period, the NOx emissions shall not exceed 3.0 g/hp-hr; and the permittee shall demonstrate compliance in accordance with OAC 3745-110-05.

c) Operational Restrictions

(1) The emergency stationary CI ICEs and any control devices shall be installed, operated, and maintained according to the manufacturer's emission-related written instructions and the permittee shall only change those emission–related settings that are allowed by the manufacturer. The CI ICEs must also be installed and operated to meet the applicable requirements from 40 CFR, Part 60, Subpart IIII; 40 CFR, Part 1039, Control of Emissions from New and In-use Nonroad CI Engines; and 40 CFR, Part 1068, the General Compliance Provisions for Engine Programs. The permittee shall operate and maintain the stationary CI ICE to achieve the emissions standards established in 40 CFR 60.4205 over the entire life of the engine(s).

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain the manufacturer's certifications, to the applicable Tier 2 emission standards in 40 CFR 1039, Appendix I, on site or at a central location for all facility ICE and it shall be made available for review upon request. If the manufacturer's certification is not kept on site, the permittee shall maintain a log for the location of each ICE and it shall identify the agency-assigned emissions unit number, the manufacturer's identification number, and the identification number of the certificate. The manufacturer's operations manual and any written instructions or procedures developed by the permittee and approved by the manufacturer shall be maintained at the same location as the ICE.

(2) The permittee shall install a non-resettable hour meter prior to startup of each engine. Maintenance checks and readiness testing of the emergency ICE shall be limited to 100 hours per year; however, there is no time limit on operations during emergency situations. The permittee may petition the Director for approval of additional hours for maintenance checks and readiness testing. Any operation of the emergency ICE during anything other than emergency situations and maintenance or readiness testing is prohibited.

(3) The permittee shall maintain records of the following information for each period of time when each emissions unit was in operation:

a. the date and total number of hours the engine was in operation;

b. the reason the engine was in operation (e.g., emergency operation, non-emergency operation, maintenance checks and readiness testing); and

c. what classified the operation as an emergency, if applicable.

(4) The permittee shall maintain the manufacturer's fuel specifications for the specific make and model of engine. For each shipment of ULSD or HVO received for burning in this emissions unit, the permittee shall maintain documentation of the total quantity of the fuel received and the fuel supplier's (or permittee's) analyses for sulfur content, in parts per million (40 CFR 1090.305) or percent by weight. The permittee shall perform or require the supplier to perform the analyses for sulfur content in accordance with 40 CFR 1090.1310, using the appropriate ASTM methods.

(5) The permittee shall maintain documentation on the manufacturer's performance data including emission rates by load percentage, for the specific make and model of engine installed. The permittee shall also maintain documentation on the parameter(s) used (RMPs, fuel flow, etc.), to measure the load on each engine.

(6) For each day during which the permittee burns fuel other than ULSD or HVO, the permittee shall maintain a record of the type, percent sulfur content, and quantity of fuel burned in the affected emissions unit.

(7) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the combined emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified Permit to Install (PTI) prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the fuels, or use of new fuels, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTI.

e) Reporting Requirements

(1) The permittee shall email Ohio EPA, DO/LAA a revised EAC form that identifies the serial number for each emergency generator within 30 days after placement on its concrete pad.

(2) The permittee shall submit quarterly deviation (excursion) reports that identify exceedances of the following:

a. Any period of time (date and number of hours) that the quality of the fuel burned in these emission units did not meet the requirements established in 40 CFR 1090.305, based upon the required fuel records; and the amount of non-compliant fuel burned on each such occasion.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions in Section A of this permit.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions Limitations

The NOx emissions from emissions units P001 through P115 combined shall not exceed 235.62 tons per rolling, 12-month period.

The CO emissions from emissions units P001 through P115 combined shall not exceed 96.06 tons per rolling, 12-month period.

Applicable Compliance Method

Compliance shall be determined in accordance with the recordkeeping specified in B.4 above.

b. Emissions Limitations

The exhaust emissions from each engine shall not exceed:

6.4 g NOx and NMHC/kW-hr
3.5 g CO/kW-hr
0.20 g PM/kW-hr

Applicable Compliance Method

Compliance with the emissions limitations above shall be based on the manufacturer's certification and by maintaining the engine according to the manufacturer's specifications.

If required, the permittee shall demonstrate compliance with the emissions limitations through performance tests conducted in accordance with the provisions in term f)(2) below.

c. Emissions Limitations

The sulfur content of the diesel fuel burned in these emission units shall not exceed 15 ppm or 0.0015% sulfur by weight.

Applicable Compliance Method

Compliance shall be determined using documents required in d)(4) above.

d. Emissions Limitations

The exhaust emissions from each engine shall not exceed:

20% opacity during the acceleration mode

15% opacity during the lugging mode

50% opacity during the peaks in either the acceleration or lugging modes

Applicable Compliance Method

The CI ICE shall be purchased certified to the opacity standards of 40 CFR 1039.105.

e. Emissions Limitation

Visible particulate emissions from the stacks serving these emission units shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.

Applicable Compliance Method

If required, compliance with the stack visible particulate emissions limitations shall be determined through visible emissions observations performed in accordance with U.S. EPA Reference Method 9 in 40 CFR, Part 60, Appendix A.

f. Emissions Limitation

Particulate emissions shall not exceed 0.062 lb/MMBtu actual heat input.

Applicable Compliance Method

Compliance shall be determined based on the manufacturer's technical data sheet specified in permit application #A0080713, dated 12/02/2025 which specifies not-to-exceed PM emissions rates.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(10).

g. Emissions Limitation

SO2 emissions from emission units P001 through P114 shall not exceed 0.5 lb/MMBtu actual heat input.

Applicable Compliance Method

Compliance shall be determined using documents required in d)(4) above. Emissions of SO2 shall be calculated in accordance with OAC rule 3745-18-04(F)(2) using the maximum fuel sulfur content of 15 ppm.

(2) If it is determined by the Ohio EPA that a compliance demonstration is required through performance testing, it shall be conducted using one of the following test methods or procedures:

a. In accordance with 40 CFR 60.4212, conduct the exhaust emissions testing using the in-use testing procedures found in 40 CFR, Part 1039, Subpart F, measuring the emissions of the regulated pollutants as specified in 40 CFR 1065; or

b. In accordance with 40 CFR 60.4212, conduct exhaust emissions testing using the test methods identified in Subpart IIII of 40 CFR Part 60.

If demonstrating compliance through the in-use testing procedures in 40 CFR, Part 1039, Subpart F, exhaust emissions from a stationary CI ICE shall not exceed the "not to exceed" (NTE) numerical requirements, rounded to the same number of decimal places as the applicable standard in 40 CFR 1039.101, determined from the following equation:

NTE requirement for each pollutant = 1.25 x STD

Where:

STD = The standard specified for the pollutant in 40 CFR 1039.101.

g) Miscellaneous Requirements

(1) None.

2. **Emissions Unit Group – Cooling tower Group: P120, P121, P122, P123, P124, P125, P126, P127, P128, P129, P130, P131, P132, P133, P134, P135, P136, P137, P138, P139, P140, P141, P142, P143, P144, P145, P146, P147, P148, P149, P150, P151, P152, P153, P154, P155**

EU ID	Operations, Property and/or Equipment Description
P120 -P131	non-contact cooling towers with drift eliminators #1-1 through #1-12
P132-P143	non-contact cooling towers with drift eliminators #2-1 through #2-12
P144-P155	non-contact cooling towers with drift eliminators #3-1 through #3-12

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) See b)(1)a., b)(2)a., c)(1), d)(1), d)(2), d)(3), e)(1) and f)(1).

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(E)	PM_{10} emissions shall not exceed 0.025 lb/hr, as a monthly average, and 0.11 ton/yr, for each emissions unit individually. $PM_{2.5}$ emissions shall not exceed 0.009 lb/hr, as a monthly average, and 0.04 ton/yr, for each emissions unit individually. Visible PE shall not exceed 10% opacity, as a six-minute average. See b)(2)a.
b.	OAC rule 3745-31-05(A)(3)(a)(ii)	The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to PM_{10} and $PM_{2.5}$ emissions from these air contaminant sources since the potential to emit of each cooling tower is less than 10 tons per year, taking into account the restrictions established under OAC rule 3745-31-05(E).
c.	OAC rule 3745-17-07(A)	See b)(2)b.
d.	OAC rule 3745-17-11(B)	See b)(2)c.

(2) Additional Terms and Conditions

a. The state-only emission limitations specified in b)(1)a. are established for the purpose of limiting PM_{10} and $PM_{2.5}$ emissions to avoid state modeling requirements. These state-only restrictions are established under OAC rule 3745-31-05(E) and are based on the operational restrictions in c)(1).

b. The visible emission limitation specified by this rule is less stringent than the visible emission limitation established pursuant to OAC rule 3745-31-05(E).

c. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(E).

c) Operational Restrictions

(1) The following operational restrictions have been included in this permit for the purpose of establishing legally and practically enforceable requirements which limit potential to emit [see b)(2)a.]:

a. These emissions units shall employ a drift eliminator achieving "drift loss" equal to or less than 0.001 percent; and

b. The permittee shall maintain the water flowrate and total dissolved solids (TDS) content of the circulating cooling water at no greater than the levels specified in permit application #A0080713, dated 12/02/2025.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information for each emissions unit individually:

a. The permittee shall test and record the TDS content in mg/l or ppm, of the cooling water at least once per month using USEPA approved test procedures or an equivalent method approved by the Ohio EPA, Northwest District Office (NWDO).

(2) Each month, the permittee shall calculate and record PM_{10} and $PM_{2.5}$ emissions, in lbs/hr, as a monthly average for each emissions unit individually. The PM_{10} and $PM_{2.5}$ shall be calculated as follows:

PM_{10} and $PM_{2.5}$ in lbs/hr = (FR) x (0.00001) x (TDS/1,000,000) x (60 min/hr) x (8.34 lb/gal) x (F)

Where:

FR = the maximum water flow rate, in gallons/min;

0.00001 = the maximum drift loss factor;

TDS = the TDS concentration, in ppm (on a monthly average basis, if more than one measurement is taken in a month);

8.34 lbs/gal = conversion factor for pounds per gallon (density of water); and

F = 0.6481 for emissions of PM_{10}*

F = 0.2363 for emissions of $PM_{2.5}$*

*The PM_{10} and $PM_{2.5}$ fractions of total PM are from Permit Memorandum 2023-0960-TVR3 from the Oklahoma Department of Environmental Quality.

(3) Each month, the permittee shall use the information in d)(2) to calculate the year-to-date PM_{10} and $PM_{2.5}$ emissions, in tons, from January to December.

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify any exceedances of the maximum water flow rate and TDS contents specified in permit application #A0080713, dated 12/02/2025.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the standard terms and conditions of this permit.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions Limitation

PM_{10}- 0.025 lb/hr, as a monthly average, for each emissions unit individually

$PM_{2.5}$- 0.009 lb/hr, as a monthly average, for each emissions unit individually

Applicable Compliance Method

Compliance shall be based upon the recordkeeping requirements specified in d)(2) of the terms and conditions of this permit.

b. Emissions Limitation

PM_{10}- 0.11 ton/yr for each emissions unit individually

$PM_{2.5}$- 0.04 ton/yr for each emissions unit individually

Applicable Compliance Method

Compliance shall be based upon the recordkeeping requirements specified in d)(3) of the terms and conditions of this permit.

c. Emission Limitation

Visible PE shall not exceed 10% opacity, as a six-minute average.

Applicable Compliance Method

If required, compliance with the visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Reference Method 9 in 40 CFR, Part 60, Appendix A.

g) Miscellaneous Requirements

(1) None.