UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region 4
Atlanta, Georgia

Prevention of Significant Deterioration Permit
For Greenhouse Gas Emissions
Permit PSD-EPA-R4013

In accordance with the provisions of the Clean Air Act (CAA), Subchapter I, Part C, 42 U.S.C. § 7470, and the implementing Prevention of Significant Deterioration (PSD) of Air Quality Regulations at the Code of Federal Regulations (CFR) Title 40, Section 52.21 (40 CFR § 52.21), and the Federal Implementation Plan at 40 CFR § 52.37 (effective December 30, 2010 and published at 75 FR 82246 (Dec. 30, 2010)) the U.S. Environmental Protection Agency Region 4 hereby authorizes:

EFS Shady Hills LLC
800 Long Ridge Road
Stamford, Connecticut 06927

to construct and operate Greenhouse Gas (GHG) air emissions units as a modification to the existing Shady Hills Generating Station located at 14240 Merchant Energy Way near the City of Spring Hill, in Pasco County, Florida.

This modification to the Shady Hills facility shall be constructed and operated in accordance with the terms and conditions set forth in this permit.

This permit becomes effective on February 15, 2014.

This permit addresses greenhouse gas-related PSD requirements, only. For this Project, the State of Florida, through the Florida Department of Environmental Protection, retains jurisdiction over PSD permitting for regulated pollutants other than greenhouse gases. This permit shall not relieve the owner or operator of the responsibility to comply fully with all applicable provisions of federal and state law.

1/14/14 /signed/

Date Signed

Jeaneanne M. Gettle
Acting Director
Air, Pesticides, and Toxics
Management Division

AUTHORITY

The EPA issues this permit pursuant to Subchapter I, Part C, of the Clean Air Act (CAA), 42 U.S.C. § 7470, and the implementing PSD Regulations at 40 CFR § 52.21, and the Federal Implementation Plan at 40 CFR § 52.37 (effective December 30, 2010 and published at 75 FR 82246 (Dec. 30, 2010)). This permit is based upon application materials submitted to the EPA by EFS Shady Hills LLC (Shady Hills), dated September 25, 2012, November 30, 2012, March 27, 2013, and July 26, 2013, supplemental submittals in the administrative record for this permit action, and upon the technical analysis performed by the EPA.

APPLICANT

EFS Shady Hills LLC
800 Long Ridge Road
Stamford, Connecticut 06927

PROJECT LOCATION

The existing Shady Hills's facility and the project are located at 14240 Merchant Energy Way near the City of Spring Hill, in Pasco County, Florida.

PROJECT DESCRIPTION

Shady Hills has applied for a GHG PSD air permit pursuant to the CAA from the EPA Region 4 for the proposed Project. Shady Hills is proposing to build two additional simple cycle combustion turbines (Model: General Electric 7FA.05) at their existing facility. The GE7FA.05 output is 218 megawatts (MW) (gross) when firing natural gas and 223 MW (gross) when firing ultra-low sulfur distillate (ULSD) fuel oil. The primary fuel will be natural gas with ULSD fuel oil, with sulfur content of is 0.015 percent, as backup fuel. The heat input per turbine would be 2,135 million British thermal units per hour (MMBtu/hour), high heating value (HHV) at 59 deg. F, 60 percent relative humidity (ISO conditions). Ancillary equipment consists of a 2.5 MW emergency generator (EU 007), a natural gas fuel heater (EU 008), a 2.8 million gallon (Mgal) ULSD fuel oil storage tank (EU 009), SF_6 circuit breakers (EU 010), and new on-site natural gas pipeline.

Shady Hills's existing facility consists of three, dual-fuel, 170 MW (nominal) GE PG7241FA simple cycle combustion turbine (SCCT)-electrical generators, three 75 feet high exhaust stacks, and one 2.8 million gallon fuel oil storage tank. The combustion turbine units can operate in simple-cycle mode and intermittent duty mode. The units are equipped with dry low-nitrogen oxides (NO_x) combustors and water injection capability. The three units are regulated under Phase II of the Federal Acid Rain Program. The existing facility and the Project are located at 14240 Merchant Energy Way near the City of Spring Hill, in Pasco County, Florida. The Project

will be located within the existing Shady Hills boundaries. The existing facility has been in operation since 2002 and operates usually during peak hours of electrical use.

This PSD permit for the Project requires the use of Best Available Control Technology (BACT) to limit emissions of GHGs, to the greatest extent feasible.

EQUIPMENT LIST

The following devices and activities are subject to this PSD permit:

Unit ID	Description
EU 005	223 MW GE 7FA.05 simple cycle combustion turbine-electrical generator
EU 006	223 MW GE 7FA.05 simple cycle combustion turbine-electrical generator
EU 007	2,500 kilowatt (kW) emergency generator firing ULSD fuel oil
EU 008	10 MMBtu/hr Natural Gas Heater
EU 009	2.8 Mgal Distillate Fuel Oil Storage Tank
EU 010	Three SF_6 Circuit Breakers
Fugitives	On-site pipeline and natural gas supply

PERMIT CONDITIONS

I. PERMIT EXPIRATION

As provided in 40 CFR § 52.21(r), this PSD Permit shall become invalid if construction:

A. is not commenced (as defined in 40 CFR § 52.21(b)(9)) within 18 months after the approval takes effect; or

B. is discontinued for a period of 18 months or more; or

C. is not completed within a reasonable time.

II. PERMIT NOTIFICATION REQUIREMENTS

Pursuant to **Condition IX: *SPECIAL CONDITIONS***, Permittee shall notify the EPA Region 4 by letter or electronic mail of the:

A. date construction is commenced, postmarked within 30 days of such date;

B. actual date of initial setting in operation for any purpose, postmarked within 15 days of such date; and

C. date upon which initial certification tests will commence, in accordance with the provisions of **Condition IX.E**, postmarked not less than 21 days prior to such date. Notification may be provided with the submittal of the certification test protocol required pursuant to **Condition IX.E**.

III. FACILITY OPERATION

A. At all times, including periods of startup, shutdown, shakedown, and malfunction, Permittee shall, to the extent practicable, maintain and operate the facility in a manner consistent with good air pollution control practices for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the EPA, which may include, but is not limited to, monitoring results, review of operating maintenance procedures and inspection of the facility.

B. The Permittee shall operate and maintain the CTs and associated components in a manner consistent with good engineering practices for its full utilization.

C. As soon as practicable following initial startup of the CTs (as defined in 40 CFR § 60.2) but prior to commencement of commercial operation (as defined in 40 CFR § 72.2), and thereafter, the Permittee shall develop and implement an operation and maintenance plan for the facility, consistent with **Condition III.B** above. At a minimum, the plan shall identify measures for assessing the performance of the facility, the acceptable range of the plant performance measures for achieving the design electrical output, the methods for monitoring the plant performance measures, and the routine procedures for maintaining the facility in good operating condition.

IV. MALFUNCTION REPORTING

A. Permittee shall notify the EPA Region 4 via the contact information provided in **Condition X: *AGENCY NOTIFICATIONS*** within two (2) calendar days following the discovery of any failure of process equipment or failure of a process to operate in a normal manner, which results in an increase in emissions above the allowable emission limits stated in **Condition IX: *SPECIAL CONDITIONS*** of this permit.

B. In addition, pursuant to **Condition X: *AGENCY NOTIFICATIONS***, Permittee shall provide written notification to the EPA within fifteen (15) calendar days of any such failure described under **Condition IV.A**. This notification shall include a description of the malfunctioning equipment or abnormal operation, the date of the initial malfunction, the period of time over which emissions were increased due to the failure, the cause of the failure, the estimated resultant emissions in excess of those allowed in **Condition IX: *SPECIAL CONDITIONS***, and the methods utilized to mitigate emissions and restore normal operations.

C. Compliance with this malfunction notification provision shall not excuse or otherwise

constitute a defense to any violation of this permit or any law or regulation such malfunction may cause.

V. RIGHT OF ENTRY

The EPA Regional Administrator, and/or an authorized representative, upon the presentation of credentials, shall be permitted:

A. to enter the premises where the facility is located or where any records are required to be kept under the terms and conditions of this PSD Permit;

B. during normal business hours, to have access to and to copy any records required to be kept under the terms and conditions of this PSD Permit;

C. to inspect any equipment, operation, or method subject to requirements in this PSD Permit; and

D. to sample materials and emissions from the source(s).

VI. TRANSFER OF OWNERSHIP

In the event of any changes in control or ownership of the facility, this PSD Permit shall be binding on all subsequent owners and operators. Within 14 days of any such change in control or ownership, Permittee shall notify the succeeding owner and operator of the existence of this PSD Permit and its conditions by letter. Permittee shall send a copy of this letter pursuant to **Condition X: *AGENCY NOTIFICATIONS*** to the EPA Region 4 within thirty (30) days of its issuance.

VII. SEVERABILITY

The provisions of this PSD Permit are severable, and, if any provision of the PSD Permit is held invalid, the remainder of this PSD Permit shall not be affected.

VIII. ADHERENCE TO APPLICATION AND COMPLIANCE WITH OTHER ENVIRONMENTAL LAWS

A. Permittee shall construct the Project in compliance with this PSD permit, the application on which this permit is based, and all other applicable federal, state, and local air quality regulations. This PSD permit does not release the Permittee from any liability for compliance with other applicable federal, state and local environmental laws and regulations, including the Clean Air Act.

B. If prehistoric or historic artifacts, such as pottery or ceramics, stone tools or metal

implements, or any other physical remains that could be associated with Native American cultures, or early colonial or America settlement are encountered at any time within the project site area, the permitted project should cease all activities involving subsurface disturbance in the immediate vicinity of such discoveries. Upon such discovery, Permittee, or other designee, shall immediately contact the Florida Department of State, Division of Historical Resources, Review and Compliance Section at 850.245.6333 or 800.847.7278, as well as the appropriate permitting agency offices (FDEP and the EPA Region 4). Project activities shall not resume without verbal and/or written authorization from the Division of Historical Resource. In the event that unmarked human remains are encountered during permitted activities, all work shall stop immediately and the proper authorities notified in accordance with Section 872.05, *Florida Statutes.*

IX. SPECIAL CONDITIONS

A. Air Pollution Control and Equipment Operation

Permittee shall perform any necessary operations to minimize emissions so that emissions are at or below the emission limits specified in this permit.

B. Combustion Turbines (EU 005 & 006) Emission Limits

1. Except as noted below under **Condition IX.C. and Condition IX.I.**, on and after the date of initial startup and completion of the shakedown period, Permittee shall not discharge or cause the discharge of emissions from the SCCT Units into the atmosphere in excess of the following:

GHG Emission Limit per CT on gross output basis and corrected to ISO conditions*	**Natural gas firing**	**ULSD oil burning**
	1,377 pounds (lb) of carbon dioxide equivalent (CO_2e) per megawatt-hour (MWh) (12-month rolling average)	1,928 lb CO_2e/MWh (12-month rolling average)

* Compliance with the above limits shall be demonstrated in accordance with **Condition IX.E.8**.

2. If both, EU 005 and 006 are constructed, they shall not operate an average of more than 3,390 hours per year per CT on a 12-month rolling total basis. No single unit shall operate more than 5,000 hours per year on a 12-month rolling total basis.

   If only one combustion turbines is installed, it shall operate no more than 3,390 hours per year on a 12-month rolling total basis.

   Permittee shall monitor and record the number of hours each CT operates monthly and totalled every month for the previous 12 months.

3. If both, EU 005 and 006 are constructed, they shall not fire ULSD fuel oil more than 1,000 combined hours per year on a 12-month rolling total. The Permittee shall monitor and record the number of hours each CT operates on ULSD monthly and totalled every month for the previous 12 months.

   If only one SCCT is installed, the CT may operate up to 500 hours firing ULSD oil per year on a 12-month rolling total. The single combustion turbine may fire additional 250 hours of ULSD oil, provided that for every hour of ULSD oil fired beyond the 500 hours, the CT must reduce its capability to fire natural gas by five hours (*i.e.*, 5:1 natural gas to ULSD fuel oil ratio).
   {Example: If the single combustion turbine operates on ULSD fuel oil for 750 hours per year on a 12-month rolling total, then it may only operate for only 1,640 hours on natural gas during the same period [(3,390-500)-5(750-500)]}

C. Combustion Turbines (EU 005 & 006) Startup and Shutdown Emission Limits

1. Startup is defined to begin on the minute when fuel is first ignited in the CT and terminates on the minute when the CT reaches 50% load.

2. Shutdown occurs on the minute when the CT load is less than 50% load until the minute that fuel flow to the CT stops.

3. Total time (in hours) during startup and shutdown shall be included in the limit on total hours of operation in Condition IX.B.2. When ULSD oil is used during startup or shutdown, the total time (in hours) of such use shall be included in the limit on hours of operation firing ULSD oil in Condition IX.B.3.

4. Permittee shall not discharge or cause the discharge of emissions from the CT Unit into the atmosphere in excess of the following during startup and shutdown events:

GHG Emission Limit per event and corrected to ISO conditions	**Natural gas firing***	**ULSD oil burning***
	21 tons CO_2e per event (12-month rolling average)	28 tons CO_2e per event (12-month rolling average)

* Compliance with the above limits shall be demonstrated in accordance with **Condition IX.E.8**.

D. Auxiliary Equipment Emission and Operational Limits and Work Practices

1. At all times, the Permittee shall not discharge or cause the discharge of emissions from each unit into the atmosphere in excess of the following, and shall otherwise comply with the following specifications on a 12-month rolling total**:**

Unit ID (description)	GHG Limit (as CO_2e)
EU 007 Emergency Generator 2,500 kW per engine	Work Practice Standards
EU 008 Natural Gas Heater 10 MMBtu/hr	3,966 TPY
EU 010 Circuit Breakers Three SF_6 Circuit Breakers	Work Practice Standards

2. EU 007 Emergency Generator shall be properly operated and maintained in accordance to manufacturer's specifications.

3. The EU 007 Emergency Generator may be operated for emergency and non-emergency situations. Combined, the total annual hours of operation of EU 007 Emergency Generator (as defined in 40 CFR 63 Subpart ZZZZ) for maintenance and testing, emergency demand response, voltage deviation, and non-emergency situations shall not exceed 100 hours per 12-month rolling total, as defined by 40 CFR 63.6640(f)(2) and (4).

   EU 007 may be operated for up to 50 hours per 12-month rolling total in non-emergency situations, which will be included in the maximum total annual hours of operation of 100 hours per 12-month rolling total.

   Permittee shall monitor and record the number of hours the emergency generator operates as well as the purpose of the operation. Permittee shall calculate the total hours of operation other than for emergency situations monthly and totalled every month for the previous 12 months.

4. EU 008 Natural Gas Heater shall operate exclusively on natural gas and in accordance with manufacturer's specifications, in order to maintain a minimum thermal efficiency of 75%.

5. EU 010 Circuit Breakers shall be used as electrical interrupters in the event of a power surge. EU 010 Circuit Breakers shall be totally enclosed. Permittee shall install and maintain a leak detection system on the circuit breakers that signals an alarm in the facility's control room in the event that any circuit breaker looses pressure. Any detected leaks must be repaired immediately. Records of inspection shall be kept in accordance with **Condition IX.G**.

6. The on-site pipeline and natural gas supply system pressure shall be monitored and

recorded continuously against alarm set points to be determined upon system design and implementation to identify any leaks. Permitte shall use natural gas treated with mercaptan for leak detection by odor. Any detected leaks must be repaired immediately. Records of inspection, detected leaks, and repairs (including action taken and duration) shall be kept in accordance with **Condition IX.G**.

E. Monitoring and Compliance with GHG Emission Limits for CTs (EU005 and 006)

1. Permittee shall install, certify, operate, and maintain fuel flow monitoring systems on each CT in accordance with the applicable requirements of 40 CFR Part 75, Appendix D, which shall constitute the "compliance monitoring system" for this permit. Consistent with §75.4(b), all applicable certification tests shall be completed within 180 calendar days after the date the unit commences commercial operation (as defined in 40 CFR 72.2).

2. Following initial certification, the fuel flow continuous monitoring system shall be quality assured in accordance with the applicable requirements of 40 CFR Part 75.

3. Data from the fuel flow continuous monitoring system and the procedure provided in 40 CFR 75.10(a)(3)(ii) along with the Global Warming Potential (GWP) factors provided in Condition J below shall be used to produce hourly determinations of CO_2e emissions in tons per hour (tons/hr). The permitte shall calculate CO_2 emissions using the Equation G-4 from 40 CFR 75 Appendix G and the CH_4 and N_2O emissions using Equation C-8 from 40 CFR 98 Subpart C.

4. In accordance with §75.62, an initial monitoring plan shall be submitted identifying the methodology for which fuel flow will be continuously monitored. The initial monitoring plan shall be submitted no later than 21 days prior to the initial certification tests.

5. Permittee shall provide notifications as specified in §75.61 for any event related to the continuous measurement of the fuel flow.

6. Permittee shall measure and record, for each CT, the following on an hourly basis:

    a. Gross energy output rate (MW);

    b. Heat input rate (MMBtu/hr; HHV), in accordance with 40 CFR Part 75, Appendix D;

    c. Unit operating time as described in §75.57(b)(2); and

    d. The type (natural gas or ULSD) and amount of fuel (scf or gals) burned.

    e. Ambient conditions (temperature, humidity, and pressure).

7. Permittee shall calculate and record, for each CT, the following on a 12-month rolling

average basis, in each case corrected to ISO conditions:

a. The 12-month rolling average CO_2e emission rate (lbs CO_2e/12-month rolling total) (for each fuel combusted in the previous 12 months) shall be calculated based on the total fuel fired during the prior 12 calendar months, at all times other than startup and shutdown, using the global warming potential (GWP) factors in **Condition J:** ***GLOBAL WARMING POTENTIAL (GWP)***.

b. The 12-month rolling gross output (MWh) (for each fuel combusted in the previous 12 months) shall be calculated based on the total fuel fired, at all times other than startup and shutdown, during the prior 12 calendar months using the global warming potential (GWP) factors in **Condition J**.

c. The 12-month rolling total CO_2e emission rate shall be divided by the 12-month rolling gross output rate to determine the lb/MWh rolling average.

8. For demonstrating compliance with the limits specified in **Condition IX.B.1**, Permittee shall use the procedures set forth in 40 CFR parts 75 and 98 to determine resulting GHG emissions (as CO_2e) using the GWP as specified in **Condition J**. Permittee shall keep adequate records of these GHG emission calculations according to requirements in **Condition IX.H.1.**

F. Monitoring and Compliance with GHG Emission Limits for CTs (EU005 and 006) During Startup and Shutdown

1. For each fuel, a new startup and shutdown CO_2e 12-month rolling average (tons CO_2e/event) is calculated each calendar month based on the summation of fuel consumption during all startup and shutdown events during the prior 12 consecutive calendar months divided by the number of startup and shutdown events in the 12-month period.

2. Permittee shall monitor and record the time, date, fuel type, and duration of each startup and shutdown event. These records must be kept for five years following the date of such events.

3. For demonstrating compliance with the limits specified in **Condition IX.C.3**, Permittee shall use the procedures set forth in 40 CFR parts 75 and 98 to determine resulting GHG emissions (as CO_2e) based on the combination of measured CO_2 emissions and calculated CO_2e of other GHG pollutants (as specified in **Condition J**). Permittee shall keep adequate records of these GHG emission calculations according to requirements in **Condition IX.H.1.**

G. Monitoring and Compliance for Auxiliary Equipment

1. Permittee shall install, operate, and maintain an operational non-resettable totalizing mass

or volumetric flow meter in each fuel line to measure fuel use for the 10.0 MMBtu/hr natural gas heater (EU 008) to be recorded monthly and totalled every month for the previous 12 months.

2. Permittee shall install, operate, and maintain a non-resettable elapsed time meter for 2,500 kW emergency use engine (EU 007) and 10.0 MMBtu/hr Natural gas heater (EU 008) to be recorded monthly and totalled every month for the previous 12 months.

3. Permittee shall calculate and record the thermal efficiency of the 10.0 MMBtu/hr natural gas heater (EU 008) on a monthly basis.

   To maintain the EU 008 operating at a high efficiency, the Permittee shall perform annual tune-ups and meet the associated requirements as follows (if the unit is not operating on the required date for a tune-up, the tune-up must be conducted within one week of startup) in accordance with manufacturer's specifications:

   a. Inspect the burner, and clean or replace any components of the burner as necessary (you may delay the burner inspection until the next scheduled unit shutdown, but you must inspect each burner at least once every 18 months).

   b. Inspect the flame pattern, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications.

   c. Inspect the system controlling the air-to-fuel ratio, and ensure that it is correctly calibrated and functioning properly

4. On a monthly basis, Permittee shall use the annual heat input as calculated using the data obtained from monitoring required by Conditions G.1 and G.2, and data from 40 CFR Part 98, Table C-1 to calculate and record CO_2e emissions from the 10.0 MMBtu/hr natural gas heater (EU 008) on a 12-month rolling average using the Global Warming Potential factors as established in Condition J.

5. Permittee shall:

   a. Continuously monitor and record circuit breakers pressure;

   b. Visually inspect, in accordance with manufacturer's standards, circuit breakers and components on a daily basis;

   c. Provide periodic maintenance to the circuit breaks and its components;

   d. Repair any leaks and replace equipment as needed;

H. Recordkeeping and Reporting

1. Permittee shall maintain a file of all records, data, measurements, reports, and documents related to the operation of the facility, including, but not limited to, the following:

    a. all records or reports pertaining to adjustments and/or maintenance performed on any system or device at the facility that are part of the emission units and activities regulated by this permit;

    b. all records relating to performance tests and monitoring of auxiliary combustion equipment; and

    c. all other information that this permit requires Permittee to obtain, maintain, or develop, recorded in a permanent form suitable for inspection.

2. Permittee shall maintain continuous monitoring system records that include the following: the occurrence and duration of any startup, shutdown, shakedown, or malfunction, performance testing, evaluations, calibrations, checks, adjustments, maintenance, duration of any periods during which a continuous monitoring system or monitoring device is inoperative, and corresponding emission measurements.

3. Permittee shall maintain records of all source tests and monitoring and compliance information required by this permit.

4. Permittee shall maintain records and submit a written report of all deviations from permit requirements to the EPA semi-annually, except when: more frequent reporting is specifically required by an applicable subpart; or the Administrator, on a case-by-case basis, determines that more frequent reporting is necessary to accurately assess the compliance status of the source. The report is due on September 30th and March 31st and shall include the following:

    a. If applicable, time intervals, data and magnitude of the excess emissions, the nature and cause (if known), corrective actions taken and preventive measures adopted;

    b. If applicable, the time and date of each period during which the continuous monitoring system was inoperative (monitor down-time), except for zero and span checks, and the nature of continuous monitoring system repairs or adjustments;

    c. A statement in the report of a negative declaration; that is, a statement when no excess emissions occurred or when the continuous monitoring system has not been inoperative, repaired, or adjusted;;

    d. Any failure to conduct any required source testing, monitoring, or other compliance activities; and

    e. Any violation of limitations on operation, including but not limited to restrictions

on hours of operation.

5. Excess emissions shall be defined as any period in which the facility emissions exceed the maximum emission limits based on the applicable averaging period as set forth in this permit.

6. A period of monitor down-time shall be any unit operating clock hour in which sufficient data are not obtained by the continuous monitoring system to validate the hour for CO_2.

7. Excess emissions indicated by **Section IX.E.** ***Monitoring and Compliance with GHG Emission Limits for CTs (EU005 and 006)*** and **Section IX.F** ***Monitoring and Compliance with GHG Emission Limits for CTs (EU005 and 006) During Startup and Shutdown*** shall be considered violations of the applicable emission limit for the purpose of this permit.

8. Permittee shall maintain a copy of the current operation and maintenance plan for the facility, and shall keep a copy of all prior versions of the plan for a minimum of five years. The Permittee shall also keep records of the monitoring data for each of the facility performance measures and all maintenance activities; the Permittee shall maintain such records for a minimum of five years following the date they are created

9. Unless otherwise specified herein, all records required by this PSD Permit shall be retained for not less than five years following the date of such measurements, maintenance, reports, and/or records. These records shall be made available for review upon request by the Agency or authorized representative during the course of an inspection.

I. Shakedown Periods

The combustion turbine and auxiliary equipment emission limits and requirements in **Conditions IX.B, IX.C, and IX.D** shall not apply during combustion shakedown periods. Shakedown is defined as the period beginning with initial startup and ending no later than the successful completion of initial performance testing, during which the Permittee conducts operational and contractual testing and tuning to ensure the safe, efficient and reliable operation of the plant. The shakedown period shall not exceed 180 days. The requirements of Section III of this permit shall apply at all times.

J. Global Warming Potential (GWP)

For the purposes of showing compliance with any GHG emission limit in this permit, the GWP factors listed in 40 CFR Part 98 Subpart A, Table A-1 amended on November 29, 2013 [78 FR 71948] and effective on January, 1 ,2014 as of the date of this permit shall be used. The current GWP factors are listed below:

GHG Pollutant	GWP Factor
CO_2	1
CH_4	25
N_2O	298
SF_6	22,800

X. AGENCY NOTIFICATIONS

All notifications, reporting or other communications relating to this permit shall be submitted to:

Chief
Air & EPCRA Enforcement Branch
Air, Pesticides and Toxics Management Division
U.S. EPA Region 4
61 Forsyth Street, SW
Atlanta, GA 30303

In addition, electronic copies of the above-referenced notifications and communications shall be submitted to the following individuals at their corresponding email address:

Name	Email	Phone
Jason Dressler	dressler.jason@epa.gov	404-562-9208
Katy R. Lusky	forney.kathleen@epa.gov	404-562-9130
Heather Ceron	ceron.heather@epa.gov	404-562-9185