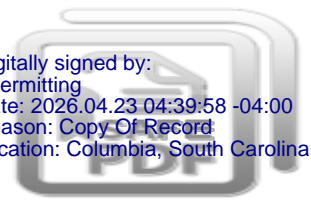


Air - Construction Permit (Modification)

version 1.13

(Submission #: HQJ-32R0-VR9VC, version 3)

Digitally signed by:
ePermitting
Date: 2026.04.23 04:39:58 -04:00
Reason: Copy Of Record
Location: Columbia, South Carolina



Details

Submission ID HQJ-32R0-VR9VC

Form Input

Pre-Application Meeting Requirements

Please refer to the [Air Permit Application Checklist](#) to assist in filling out this application. Failure to follow the checklist may result in your application being deemed incomplete or rejected.

Submission of this form requires two signatures, owner/operator and a Professional Engineer (PE) licensed in the State of South Carolina. Both must have an approved Certifier Agreement on file to complete the submission process. You can find instructions how to submit an electronic signature agreement [here](#). Additional ePermitting training can be located on the [ePermitting training page](#) and the [Air Quality ePermitting training page](#).

A Pre-Application Meeting:

- Is required prior to the submission of applications for the following projects:
 - [Energy Infrastructure Project \(EIP\)](#)
 - Prevention of Significant Deterioration (PSD)
 - 112(g)
 - Synthetic Minor
 - Projects with large public interest.
- During the pre-application meeting we will:
 - Identify milestones specific to the individual application/site (community engagement, design, key project construction dates)
 - Establish an agreed upon issuance date if necessary
 - Discuss applicable regulatory standards as they apply to individual applications
 - Go over modeling

If you are required to have pre-application meeting and have not contacted Air Permitting Division to set one up. Please do so before submitting this form.

Do you have confidential information or data to submit?

No

Energy Infrastructure Projects (EIP)

An [Energy Infrastructure Project \(EIP\)](#) is a project, which is submitted on or after **May 12, 2025**, entailing the construction, placement,

authorization, or removal of energy infrastructure including, but not limited to, electric transmission and generation assets, natural gas transmission assets, and all associated or appurtenant infrastructure and activities, including communications and distribution infrastructure.

Is this project an Energy Infrastructure Project (EIP)?

No

Facility Information

Air Permit Number

CP-50000316

Will this project add to or change emission rates that were previously modeled?

Yes

Is this facility considered a Single Source or potentially a Single Source with another facility?

No

Would you like expedited processing?

No

If the facility site name listed below has changed and needs to be updated, please complete and submit form "Air Permitting - Site Name Update (Not Transfer of Ownership)".

Site Name

Valara Holdings High Performance Compute Center

Have the facility's primary products, services, SIC Codes, or NAICS Codes changed?

No

Facility Physical Address

4000 S Pine Street
Spartanburg, SC 29302

County

Spartanburg

Facility Physical Location

34.923,-81.8519

4000 S Pine Street, Spartanburg, SC

On the Google map in the "Search by name or address" field, type in the address. If address does not work, use the name of facility. Once pin icon finds the location, verify the pin is at the correct location. The pin should be located at the center location of all permitted devices. If not, use the mouse and move the pin to a more precise location. The longitude and latitude coordinates will adjust accordingly as you move the pin icon. To help, you can change the map view to a satellite view. The plus (+) and minus (-) buttons help to zoom in and zoom out your view.

For the facilities whose address is not in close proximity of their facility, find the closest street or crossing streets. Use your mouse on the Google map to move locator arrow on map to drop red marker closest to the center of the facilities processes. The facility building can be pending construction or existing.

Project Information

Project Description

The Valara Holdings High Performance Compute Center in Spartanburg, South Carolina will consist of Data Center Operations to host computing services for internal use. The facility plans to produce its own power and is already permitted to install 24- 2,000 kilowatt (KW) natural gas fired Cummins generators. The facility was issued Air Permit CP-50000316 v1.0 on 9/17/25.

To provide additional power for operations, the facility plans to install and operate 5- 17 megawatt (MW) natural gas fired Baker Hughes combustion turbines and 6- 54 MW natural gas fired General Electric (GE) combustion turbines. The turbines will operate up to 8,760 hours per year. Each turbine will include a selective catalytic reduction control device for nitrous oxides (NOx) control and an oxidation catalyst (OxCat) for control of carbon monoxide (CO), volatile organic compounds (VOCs), and hazardous air pollutants (HAPs). Additional ancillary equipment onsite includes the following insignificant sources:

- ◆ One approximately 100 horsepower (HP) diesel-fired fire pump engine
- ◆ Four natural gas-fired hot water boilers
- ◆ Sixteen non-contact cooling towers

The fire pump, hot water boilers, and cooling towers are exempt from permitting as described in more detail below.

As an attachment to this form include a narrative with the following information:

1. Description of the facility's proposed new or altered processes. Include how the new or altered sources affect the existing operation (e.g., removal of bottlenecks, increase of capacity).
2. A detailed schedule for construction of the source or modification.
3. Design capacity of the proposed or modified sources.
4. Typical operating schedule of the proposed or modified sources.
5. Physical and chemical properties and feed rate of the raw materials used and products made from which the facility determined potential emissions.
6. Specifications and drawings showing its design and plant layout.
7. Process flow diagram / production process layout of all new or altered sources showing the flow of materials and intermediate and final product. Include emission routing and exhaust points to the atmosphere.

Additional information required to complete the review of this permit application should be submitted as attachments.

Narrative Attachment

[Valara Construction Permit application Supporting Information_03022026.pdf - 03/04/2026 10:01 AM](#)

Comment

NONE PROVIDED

Permit Types

Synthetic Minor

Potentially applicable regulations or standards are those that superficially appear that they could apply to the facility/source.

Please select applicable and potentially applicable regulations:

40 CFR 60
40 CFR 63
SC Regulations 61-62

Equipment Information

Equipment Table Instructions

Be as detailed as possible when filling out "Equipment Description." The following includes examples of source types and relevant information associated with that source:

- **External Combustion Sources:** Equipment type and usage (e.g. steam generation, process heat, drying, curing, etc.), maximum heat capacity (Million BTU/hr), primary and backup fuel type (e.g. natural gas, fuel oil, coal, etc.), low NOx burners, direct or indirect heating
- **Stationary Internal Combustion Sources:** Equipment type and usage (e.g. emergency generator, fire pump, etc.), output brake/electrical power (hp/kW), fuel type
- **Liquid Storage Tanks:** Tank type (e.g. fixed roof, floating roof, variable vapor pressure, etc.), materials stored, loading source (e.g. pipeline car, process, etc.)
- **Incinerators:** Incinerator type (e.g. rotary kiln, air curtain, single chamber, etc.), primary and secondary waste types (e.g. municipal waste, yard waste, clean wood, etc.), waste charge rate (tons/day or lb/hr), burner capacity (BTU/hr), minimum chamber temperature
- **Surface Coating Sources:** Coating operation type (e.g. large appliances, auto and light duty trucks, paper and other webs, publication print inks, etc.)

Review applicable regulations to determine additional information that may be required for permitting.

Equipment Information

Information can be entered in the table below on your internet browser or downloaded and opened in Excel.

- When opening in Excel,
 - The file name must remain unchanged, "Equipment Information"

- The name and order of the columns must remain unchanged
- For the “Equipment Action” column, you must use an option from the following list (with no additional spaces or changes in formatting):
 - Add
 - Remove
 - Modify
 - Existing

Additional information can be found on the Reference sheet.

Equipment Information

[Equipment Information.xlsx](#)

Do you have any Control Devices associated with your Equipment?

Yes

Control Device Instructions

Please add a row with 'Add Row' button if you need to input more than one Control Device.

Inherent, required and voluntary control devices, as used in the table below, are defined as:

- **Inherent:** Consult the EPA Guidance link below. A statement of “Inherent” should be accompanied by a detailed explanation of the determination as an attachment.
- **Required:** Control device is relied-upon or required by regulation, and controlled emissions are used to show compliance with applicable standards and regulations.
- **Voluntary:** Control device is not relied-upon and uncontrolled emissions are used to show compliance with applicable standards and regulations.

[Criteria for Determining Whether Equipment is Air Pollution Control Equipment or Process Equipment](#)

Control Device Table

Information can be entered in the table below on your internet browser or downloaded and opened in Excel.

- When opening in Excel,
 - The file name must remain unchanged, “Control Devices”
 - The name and order of the columns must remain unchanged
 - For the “Action” column, you must use an option from the following list (with no additional spaces or changes in formatting):
 - Add
 - Remove
 - Modify
 - Existing
 - For the “Inherent/Required/Voluntary” column, you must use an option from the following list (with no additional spaces or changes in formatting):
 - Inherent

- Required
- Voluntary

Additional information can be found on the Reference sheet

Control Device Table

[Control Devices.xlsx](#)

Are any control devices voluntary or inherent?

No

Exempt Equipment

[Bureau of Air Quality Permitting Exemption List](#)

Are any exempt sources being installed with this project?

Yes

Exempt Equipment

Equipment ID	Equipment Description	Exemption Basis
PUMP-001	100 hp fire pump	Exempt Sources per Bureau of Air Quality Permitting Exemption List Section B.2.3
BOILER01- BOILER04	Hot water Boilers	Chapter 61 Article 62 Regulation 1 Section II (B)(2)(b)
CT01-CT16	Cooling towers	Exempt Sources per Bureau of Air Quality Permitting Exemption List Section B.6.xii

Emissions

CORRECTION REQUEST (CORRECTED)

Hexane

Please address potential hexane emissions from the turbines.

Created on 4/20/2026 9:55 AM by **Tyler D. Dunlop**

1 COMMENT

Stephanie McMackin (stephanie.mcmackin@jacobs.com) (4/22/2026 3:02 PM)

Updated; however, there is no widely accepted emission factor for hexane from combustion turbines. The emission factor cited is based on data from 30 years ago from one sample and should be treated as a very conservative estimate.

Will this modification change emissions?

Yes

Is this facility considered a major source under PSD?

No

Definitions for completing the information in the tables below:

- **Uncontrolled emissions:** Maximum emission rate at full design capacity without consideration of control devices or emission limitations.
- **Controlled emissions:** Maximum emission rate at full design capacity taking into consideration control devices.
- **Potential to Emit (PTE):** The maximum capacity of a source to emit a regulated pollutant under its physical and operational design. Any physical or operational limitation on the capacity of the source to emit a regulated pollutant, including air pollution control equipment and restrictions on hours of operation or on the type or amount of material combusted, stored, or processed, shall be treated as part of its design only if the limitation or the effect it would have on emissions is federally enforceable. Secondary emissions do not count in determining the potential to emit of a source.
 - Emission reductions from voluntary control devices should not be factoring in the above calculations.
 - Emission reductions from inherent control devices are included as uncontrolled emissions.

For each piece of equipment or process in this project, provide emission calculations for each pollutant in an attached spreadsheet.

Emission Spreadsheets

Revised Emission Calculations 042126.xlsx - 04/22/2026 03:00 PM

Comment

NONE PROVIDED

CORRECTION REQUEST (APPROVED)

Supplemental Information

Please provide the referenced data set used to determine the PM emissions for the 17 MW turbines (see footnote in the "Criteria 17 MW" sheet). Please provide the source for startup/shutdown event emissions.

Created on 3/11/2026 4:03 PM by **Tyler D. Dunlop**

NOTE (CREATED)

Other

Column E in sheet "17 MW CTC Data Updated" contains higher calculated emission rates than Column F. Please provide a footnote explaining why Column F was used over Column E or update the calculations accordingly.

Note that for any of the correction requests, if it is easier to provide copies of emails, other documents, or write-ups explaining the needed information rather than complete spreadsheet files, we can accommodate this.

Created on 3/11/2026 4:09 PM by **Tyler D. Dunlop**

Additional documentation should include but is not limited to the following:

Emission Calculations Spreadsheet

Emission factors used along with the complete details of the emission factor source(s) – source name, date, version, chapter, table, etc.

When using source test information as the factor, provide:

- SCDES approved test date OR a copy of the source test results
- An explanation why this source is representative for this equipment/process
- Where the test was conducted; and
- Any other identifying information

For Surface Coating Sources:

- Safety data sheet (SDS) or environmental data sheet (EDS)
- % Volatile Organic Compound (VOC) content
- % Hazardous Air Pollutants (HAPs) content
- Coating density
- Transfer efficiencies

For control devices:

- Manufacturer's data, or vendor guarantees supporting control device efficiencies
- Details of the capture system, ie. hard piped, hood, etc.

Fuel Information:

- Fuel Type
- Fuel Sulfur Content
- Equipped with Low NOx burners
- BTU Content of fuel
- % Ash

Liquid Storage Tanks

- Material Density
- Maximum True Vapor Pressure
- Maximum Average Storage Temperature

Details on limits being taken for Potential to Emit (PTE) emissions, such as hours of operation.

Other supporting information (e.g. particle size distribution, etc.), as applicable.

If this project is for a PSD major facility, include the justifications for projected actual or potential to emit, as applicable, baseline actual, and could have accommodated/not related to the project.

Additional Documentation as outlined above

[App A Emission Calculations 030226.pdf - 03/03/2026 07:58 AM](#)

[TURBINE-X Preliminary Emissions Analysis_BH 2025_08_21 for PM.pdf - 03/13/2026 10:32 AM](#)

[NovaLT16_SG_15ppm_EmissionStudy SUSD emissions.pdf - 03/13/2026 01:29 PM](#)

[LM6PF1_GAS_TYPICAL_SUSD_STACK_5-8-10min_start_30minutes duration.pdf - 03/14/2026 02:42 PM](#)

Comment

NONE PROVIDED

Synthetic Minor Limits (1 of 1)

Provide additional documentation in the attachment field in the Regulatory Narrative Section.

Avoided Regulation

S.C. Regulation 61-62.5, Standard No. 7

Pollutant	Limit (Units)	Equip ID(s)/Emission Unit ID(s)/Facility Wide	New or Modify?	Date limit was established, including permit number
Nitrogen Oxides (NOx)	250 TPY	Facility Wide	Modify	9/17/2025, CP-50000316
Carbon Monoxide (CO)	250 TPY	Facility Wide	Modify	9/17/2025, CP-50000316
Total HAP	25 TPY	Facility Wide	Modify	9/17/2025, CP-50000316
Total Volatile Organic Compounds (VOC)	250 TPY	Facility Wide	Modify	9/17/2025, CP-50000316

State Air Pollution Control Regulations and Standards (1 of 10)

S.C. Regulation 61-62.5, Standard No. 1 Emissions from Fuel Burning Operations

Provide additional documentation in the attachment field in the Regulatory Narrative Section.

Regulation/Standard

S.C. Regulation 61-62.5, Standard No. 1 Emissions from Fuel Burning Operations

Applicability

Not Applicable

Equipment ID(s)
NONE PROVIDED

Explain why the State Regulation does or does not apply.

These requirements do not apply to the turbines as they do not meet the definition of fuel burning operations.

State Air Pollution Control Regulations and Standards (2 of 10)

S.C. Regulation 61-62.5, Standard No. 2 Ambient Air Quality Standards

Provide additional documentation in the attachment field in the Regulatory Narrative Section.

Regulation/Standard

S.C. Regulation 61-62.5, Standard No. 2 Ambient Air Quality Standards

Applicability

Applicable

Explain why the State Regulation does or does not apply.

Modeling was conducted to demonstrate the project would comply with the ambient air quality standards. Results of the completed modeling indicate the project would not cause or contribute to an exceedance of ambient air quality standards.

State Air Pollution Control Regulations and Standards (3 of 10)

S.C. Regulation 61-62.5, Standard No. 5.2 Control of Oxides of Nitrogen (NOX)

Provide additional documentation in the attachment field in the Regulatory Narrative Section.

Regulation/Standard

S.C. Regulation 61-62.5, Standard No. 5.2 Control of Oxides of Nitrogen (NOX)

Applicability

Applicable

Equipment ID(s)	Pollutant/Parameter	Limit (units)	How do you plan to comply?
CT-025 CT-026 CT-027 CT-028 CT-029 CT-030 CT-031 CT-032 CT-033 CT-034 CT-035	NOX	25 ppm limit for units < 50 MW and 9 ppm for units > 50 MW	The 17 MW turbines are not subject to this requirement because the NSPS KKKKa standard is more stringent. The 54 MW turbines have an emission rate of 2.5 ppm NOx and are therefore compliant with this requirement.

CORRECTION REQUEST (APPROVED)

Small Turbine Applicability

The limits provided from Std. 5.2 are listed correctly. NSPS KKKKa provides a limit of 15 ppm for turbines >50 MMBtu/hr and <850 MMBtu/hr. The 17 MW turbines would not be subject to Std. 5.2 because the limit in KKKKa is more stringent.

Created on 3/11/2026 3:58 PM by **Tyler D. Dunlop**

Explain why the State Regulation does or does not apply.

The turbines are compliant with 40 CFR 60 Subpart KKKKa. Because the equipment meets the NOx limits set by the aforementioned Federal regulation, it is considered to be compliant with state regulation as well. The NOx emission rates are expected to be below the 25 ppm limit for units < 50 MW and 9 ppm for units > 50 MW as required by Section III Table 1 of this rule.

State Air Pollution Control Regulations and Standards (4 of 10)

S.C. Regulation 61-62.5, Standard No. 7.1 Nonattainment New Source Review

Provide additional documentation in the attachment field in the Regulatory Narrative Section.

Regulation/Standard

S.C. Regulation 61-62.5, Standard No. 7.1 Nonattainment New Source Review

Applicability

Not Applicable

Equipment ID(s)
NONE PROVIDED

Explain why the State Regulation does or does not apply.

The county is in attainment with all NAAQS.

State Air Pollution Control Regulations and Standards (5 of 10)

S.C. Regulation 61-62.5, Standard No. 8 Toxic Air Pollutants

Provide additional documentation in the attachment field in the Regulatory Narrative Section.

Regulation/Standard

S.C. Regulation 61-62.5, Standard No. 8 Toxic Air Pollutants

Applicability

Not Applicable

Explain why the State Regulation does or does not apply.

Because the sources of this facility use pipeline natural gas, a virgin fuel, this standard does not apply to the Valara Holdings High Performance Compute Center.

State Air Pollution Control Regulations and Standards (6 of 10)**S.C. Regulation 61-62.6 Control of Fugitive Particulate Matter**

Provide additional documentation in the attachment field in the Regulatory Narrative Section.

Regulation/Standard

S.C. Regulation 61-62.6 Control of Fugitive Particulate Matter

Applicability

Not Applicable

Explain why the State Regulation does or does not apply.

The Valara Holdings High Performance Compute Center will not include operations that create significant levels of fugitive particulates. The majority of the facility will be paved and there are no material handling operations.

State Air Pollution Control Regulations and Standards (7 of 10)**S.C. Regulation 61-62.60 South Carolina Designated Facility Plan and New Source Performance Standards**

Provide additional documentation in the attachment field in the Regulatory Narrative Section.

Regulation/Standard

S.C. Regulation 61-62.60 South Carolina Designated Facility Plan and New Source Performance Standards

Applicability

Applicable

Explain why the State Regulation does or does not apply.

Applicable New Source Performance Standards were described in the Federal applicability section 40 Code of Federal Regulations (CFR) Part 60.

State Air Pollution Control Regulations and Standards (8 of 10)**S.C. Regulation 61-62.61 National Emission Standards for Hazardous Air Pollutants (NESHAP)**

Provide additional documentation in the attachment field in the Regulatory Narrative Section.

Regulation/Standard

S.C. Regulation 61-62.61 National Emission Standards for Hazardous Air Pollutants (NESHAP)

Applicability

Not Applicable

Explain why the State Regulation does or does not apply.

There are no applicable NESHAPs for this facility.

State Air Pollution Control Regulations and Standards (9 of 10)

S.C. Regulation 61-62.63 National Emission Standards for Hazardous Air Pollutants (NESHAP) for Source Categories

Provide additional documentation in the attachment field in the Regulatory Narrative Section.

Regulation/Standard

S.C. Regulation 61-62.63 National Emission Standards for Hazardous Air Pollutants (NESHAP) for Source Categories

Applicability

Applicable

Explain why the State Regulation does or does not apply.

Applicable NESHAPs for Source Categories were described in the 40 CFR 63 section above.

State Air Pollution Control Regulations and Standards (10 of 10)

S.C. Regulation 61-62.70 Title V Operating Permit Program

Provide additional documentation in the attachment field in the Regulatory Narrative Section.

Regulation/Standard

S.C. Regulation 61-62.70 Title V Operating Permit Program

Applicability

Applicable

Equipment ID(s)	Pollutant/Parameter	Limit (units)	How do you plan to comply?
Facility	NOx, CO, PM10, PM2.5	TPY	Will submit a Title V application within applicable timeframe

Explain why the State Regulation does or does not apply.

The Facility will become a major source of emissions under the Title V Operating Permit program. The facility will submit a Title V application in accordance with requirements once construction is complete.

40 CFR 60 (1 of 5)

40 CFR 60 Subpart A General Provisions

Provide additional documentation in the attachment field in the Regulatory Narrative Section.

Regulation/Standard

40 CFR 60 Subpart A General Provisions

Applicability

Applicable

Please explain why the Federal Regulation does or does not apply

The general provisions set forth in NSPS Subpart A apply to owners or operators of stationary sources subject to NSPS. Because NSPS will apply to the Valara Holdings High Performance Compute Center facility, it will be subject to and will comply with the applicable Subpart A provisions.

Equipment ID(s)	Pollutant/Parameter	Limit (units)	How do you plan to comply?
CT-025 CT-026 CT-027 CT-028 CT-029 CT-030 CT-031 CT-032 CT-033 CT-034 CT-035	NONE PROVIDED	NONE PROVIDED	NONE PROVIDED

40 CFR 60 (2 of 5)

40 CFR 60 Subpart GG Stationary Gas Turbines

Provide additional documentation in the attachment field in the Regulatory Narrative Section.

Regulation/Standard

40 CFR 60 Subpart GG Stationary Gas Turbines

Applicability

Not Applicable

CORRECTION REQUEST (APPROVED)

Applicability

◆ 60.330(d) units subject to KKKKa are not subject to this subpart. Please update the applicability determination.
Created on 3/11/2026 3:14 PM by **Tyler D. Dunlop**

Please explain why the Federal Regulation does or does not apply

The combustion turbines will be subject to NSPS under 40 CFR 60 Subpart GG. This applies to all stationary gas turbines with a heat input at peak load equal to or greater than 10.7 gigajoules (10 million Btu) per hour, based on the lower heating value of the fuel-fired and commenced construction, modification, or reconstruction after October 3, 1977. The proposed CTGs are also subject to Subpart KKKKa, which exempts the units from the requirements of Subpart GG per ◆60.4305a(b).

Equipment ID(s)
NONE PROVIDED

40 CFR 60 (3 of 5)

40 CFR 60 Subpart IIII Stationary Compression Ignition Internal Combustion Engines

Provide additional documentation in the attachment field in the Regulatory Narrative Section.

Regulation/Standard

40 CFR 60 Subpart IIII Stationary Compression Ignition Internal Combustion Engines

Applicability

Applicable

Please explain why the Federal Regulation does or does not apply

Subpart IIII (◆60.4200 et seq.) applies to stationary CI RICE and the manufacturers and/or owners and operators of these engines. For purposes of this application, Subpart IIII is applicable the fire pump as a new CI RICE and will comply with the requirements of Subpart IIII.

The emergency fire pump engine will be a certified engine capable of meeting the applicable 40 CFR 60.4205(c) and Table 4 limits.

Equipment ID(s)	Pollutant/Parameter	Limit (units)	How do you plan to comply?
PUMP-001	NONE PROVIDED	NONE PROVIDED	Will purchase an EPA Tier certified unit

40 CFR 60 (4 of 5)

40 CFR 60 Subpart KKKKa Stationary Combustion Turbines

Provide additional documentation in the attachment field in the Regulatory Narrative Section.

Regulation/Standard

40 CFR 60 Subpart KKKKa Stationary Combustion Turbines

Applicability
Applicable

Please explain why the Federal Regulation does or does not apply

The combustion turbines will be subject to NSPS under 40 CFR 60 Subpart KKKKa. Subpart KKKKa applies to all stationary combustion turbines with a heat input at peak load equal to or greater than 10.7 gigajoules (10 MMBtu) per hour constructed, modified, or reconstructed after December 13, 2024. The proposed Valara combustion turbines will have a peak heat input greater than 10.7 gigajoules (10 MMBtu/hour). Subpart KKKKa regulates pollutant emissions of NOX and SO2 for each turbine.

For NOX, the applicable Subpart KKKK standard is for new, modified, or reconstructed natural gas-fired combustion turbines with heat input greater than 50 MMBtu/hour and less than 850 MMBtu/hour and utilization rate greater than 45%. Per Subpart KKKKa Table 1, the applicable NOX limitation for each turbine is either 15 ppm at 15 percent O2 or 0.055 pounds per megawatt-hour. The proposed turbines will utilize SCR technology to limit NOx to 2.5 ppm at 15 percent O2, well below the NSPS limit.

For SO2, 40 CFR 60 Subpart KKKK regulates SO2 emissions by limiting SO2 emissions to 0.90 pound per megawatt-hour (lb/MWh) gross output or by limiting the fuel potential sulfur emissions to 0.060 lb SO2/MMBtu heat input. The proposed turbines will meet the NSPS requirements by combusting natural gas (approximately 0.0006 lb SO2/MMBtu).

Per 40 CFR 60.4340, the NSPS requires that a NOX compliance test be completed annually. If results of the previous test are less than 75% of the NOx standard, the test frequency can be reduced to once every two years. As an alternative, CEMS can be installed to continuously monitor NOX emissions or a continuous parameter monitoring system (for example a temperature monitor) to monitor operations of the SCR.

Equipment ID(s)	Pollutant/Parameter	Limit (units)	How do you plan to comply?
CT-025 CT-026 CT-027 CT-028 CT-029 CT-030 CT-031 CT-032 CT-033 CT-034 CT-035	SO2	0.9 lb/MWH	The proposed turbines will meet the NSPS requirements by combusting natural gas (approximately 0.0006 lb SO2/MMBtu)
CT-025 CT-026 CT-027 CT-028 CT-029 CT-030 CT-031 CT-032 CT-033 CT-034 CT-035	NOx	15 ppm at 15 percent O2 or 0.055 pounds per megawatt-hour	The NSPS requires a performance test to be performed within 180 days of initial startup of a turbine with specified reference method, operations, notification, and recordkeeping.

40 CFR 60 (5 of 5)

40 CFR 60 Subpart TTTTa Greenhouse Gas Emissions for Modified Coal-Fired Steam Electric Generating Units and New Construction and Reconstruction Stationary Combustion Turbine Electric Generating Units

Provide additional documentation in the attachment field in the Regulatory Narrative Section.

Regulation/Standard

40 CFR 60 Subpart TTTTa Greenhouse Gas Emissions for Modified Coal-Fired Steam Electric Generating Units and New Construction and Reconstruction Stationary Combustion Turbine Electric Generating Units

Applicability
Not Applicable

Please explain why the Federal Regulation does or does not apply

Subpart TTTTa applies to stationary combustion turbines that commences construction or reconstruction after May 23, 2023, have a base heat input rating greater than 250 MMBtu/hour, and serve a generator capable of selling 25 MW of electricity to a utility power distribution system. [40 CFR 60.5508a and 60.5509a] The proposed combustion turbine will not sell power to the grid. As a result, the proposed turbine will not be subject to this Subpart.

Equipment ID(s)
NONE PROVIDED

40 CFR 63 (1 of 2)

40 CFR 63 Subpart YYYY Stationary Combustion Turbines

Provide additional documentation in the attachment field in the Regulatory Narrative Section.

Regulation/Standard

40 CFR 63 Subpart YYYY Stationary Combustion Turbines

Applicability

Not Applicable

Please explain why the Federal Regulation does or does not apply

This rule (40 CFR 63 Subpart YYYY) establishes national emission limitations and operating limitations for HAP emissions from stationary combustion turbines located at major sources of HAP emissions. With the proposed Project emissions, the facility would be considered an area source of HAPs and not subject to the requirements of Subpart YYYY.

Equipment ID(s)
NONE PROVIDED

40 CFR 63 (2 of 2)

40 CFR 63 Subpart ZZZZ Stationary Reciprocating Internal Combustion Engines

Provide additional documentation in the attachment field in the Regulatory Narrative Section.

Regulation/Standard

40 CFR 63 Subpart ZZZZ Stationary Reciprocating Internal Combustion Engines

Applicability

Applicable

Please explain why the Federal Regulation does or does not apply

Subpart ZZZZ establishes emissions and operating limits for HAPs emitted from stationary reciprocating internal combustion engines (RICE) located at major and area HAP sources. As an area source of HAPs, the Facility will satisfy Subpart ZZZZ requirements for the fire pump engine by meeting the NSPS Subpart IIII requirements for those units, per 40?CFR?63.6590(c)(1).

Equipment ID(s)	Pollutant/Parameter	Limit (units)	How do you plan to comply?
PUMP-001	NONE PROVIDED	NONE PROVIDED	NONE PROVIDED

Regulatory Narrative

Detailed Regulatory Analysis

[Valara Construction Permit application Supporting Information_03022026.pdf - 03/04/2026 10:03 AM](#)

Comment

NONE PROVIDED

Emission Point Information Instructions

The information in this form will provide Emission Point dispersion parameters for any new emission points or any revised emission points. This information is required for all non-exempt sources, regardless of whether or not a particular source was evaluated using air dispersion modeling.

Source data requirements are based on the appropriate source classification. Each emission source is classified as a point, area, volume, or flare source. Contact the Bureau of Air Quality for clarification of data requirements. Include source on-site map. Also, a picture of area or volume sources would be helpful but is not required. A user generated document or spreadsheet may be substituted in lieu of this form provided the required emission point parameters are submitted in the same order as presented in these tables.

Please click the link below for full instructions regarding this form. The applicant needs to read the instructions before filling out the form.

Do you want to upload a user generated document or spreadsheet in lieu of filling out the Emission Point Data form?

Yes

Attachment - User generated document (spreadsheet)

[Emissions Point and Building Data.xlsx - 03/04/2026 10:03 AM](#)

Comment

NONE PROVIDED

Modeling Files

Attach Modeling Files and Air Quality Analysis/Report to address compliance with Standards 2, 7, and/or 8.

[AERMOD modeling files.zip - 03/04/2026 10:19 AM](#)

[partial terrain.zip - 03/04/2026 10:25 AM](#)

Comment

NONE PROVIDED

Contact(s)

The Air Permitting Contact is the person who can answer technical questions about the facility and permit application.

Air Permitting Contact

Prefix

Ms.

First Name Middle Name Last Name

Stephanie NONE PROVIDED McMackin

Title

EHS Auditing and Compliance Global Principal

Phone Type Number Extension

Mobile 7403577559

Email

stephanie.mcmackin@jacobs.com

Mailing Address

25 Ferrer Lane

Greenup, KY 41144

United States

Is there an additional Air Permitting Contact?

No

Signatory Authority

The owner or operator is any person who owns, leases, operates, controls, or supervises a source of air emissions. This cannot be the consultant, unless the consultant is contracted to perform these activities.

The information in this section should be for the individual signing this form on behalf of the company.

Owner or Operator

Prefix

Mr.

First Name Middle Name Last Name

Andrew *NONE PROVIDED* Udin

Title

Chief Legal Officer

Phone Type Number Extension

Mobile 9295622958

Email

andrew.udin@nmsgroup.llc

Mailing Address

32 Avenue of the Americas, 26th Floor

New York, NY 10013

PE Requirements

Construction permit applications shall be reviewed, signed, and sealed by a professional engineer registered to practice in the State of South Carolina (except professional engineers employed by the federal government preparing applications for the federal government or other professional engineers exempted from the state registration requirements).

Professional Engineer License/Registration No.

33582

SC Certificate of Authority License No.

NONE PROVIDED

Professional Engineer

Prefix

Ms.

First Name Middle Name Last Name

Stephanie *NONE PROVIDED* McMackin

Title

EHS Auditing and Compliance Global Principal

Organization Name

Jacobs

Phone Type Number Extension

Mobile 7403577559

Email

stephanie.mcmackin@jacobs.com

PE Seal

[SC stamp.pdf - 02/26/2026 02:23 PM](#)

Comment

NONE PROVIDED

Revisions

Revision	Revision Date	Revision By
Revision 1	12/24/2025 12:58 PM	Abby Glover
Revision 2	3/13/2026 9:10 AM	Stephanie McMackin
Revision 3	4/21/2026 11:49 AM	Stephanie McMackin

Agreements and Signature(s)

SUBMISSION AGREEMENTS

- I am the owner of the account used to perform the electronic submission and signature.
- I have the authority to submit the data on behalf of the facility I am representing.
- I agree that providing the account credentials to sign the submission document constitutes an electronic signature equivalent to my written signature.
- I have reviewed the electronic form being submitted in its entirety, and agree to the validity and accuracy of the information contained within it to the best of my knowledge.

Owner/Operator

I certify, to the best of my knowledge and belief, that no applicable standards and/or regulations will be contravened or violated. I certify that any application form, report, or compliance certification submitted in this permit application is true, accurate, and complete based on information and belief formed after reasonable inquiry. I understand that any false information or misrepresentation may result in the immediate revocation of any permit issued for this application.

Signed By Andrew Udin on 04/23/2026 at 4:39 AM

Professional Engineer

I have placed my signature and seal on the engineering documents submitted, signifying that I have reviewed this construction permit application as it pertains to the requirements of South Carolina Regulation 61-62, Air Pollution Control Regulations and Standards.

Signed By Stephanie McMackin on 04/22/2026 at 3:05 PM