

State of Washington Department of Ecology
Notice of Construction Approval Order

In the matter of approving a new air)
contaminant source for VoltaGrid LLC)
- QWA1 Electrical Generation Plant)

Approval Order: Preliminary Determination
AQPID No. A0250335

Project Summary

VoltaGrid LLC – QWA1 Electrical Generation Plant, herein referred to as the Permittee, is a baseload power facility with maximum output of 30 MWe (64,414 brake horsepower) located East of Road O NW and North of Road L NW, Quincy, Washington, in Grant County.

The Permittee is classified as a synthetic minor for NO_x, CO, VOC, formaldehyde, and acetaldehyde.

The project consists of installation and operation of the following equipment:

Table 1: Engine and Generator Serial Numbers (SN)

ID No.	Emission Unit with Air Pollution Control Equipment	Engine SN	Generator SN	Date of Commission Completion
EU1	Jenbacher J620 natural gas-fired engines, 4,601 brake horsepower (bhp) with Selective Catalytic Reduction (SCR) and oxidation catalyst (OC) controls			
EU2	Jenbacher J620 engine, 4,601 bhp with SCR and OC controls			
EU3	Jenbacher J620 engine, 4,601 bhp with SCR and OC controls			
EU4	Jenbacher J620 engine, 4,601 bhp with SCR and OC controls			
EU5	Jenbacher J620 engine, 4,601 bhp with SCR and OC controls			
EU6	Jenbacher J620 engine, 4,601 bhp with SCR and OC controls			
EU7	Jenbacher J620 engine, 4,601 bhp with SCR and OC controls			
EU8	Jenbacher J620 engine, 4,601 bhp with SCR and OC controls			

ID No.	Emission Unit with Air Pollution Control Equipment	Engine SN	Generator SN	Date of Commission Completion
EU9	Jenbacher J620 engine, 4,601 bhp with SCR and OC controls			
EU10	Jenbacher J620 engine, 4,601 bhp with SCR and OC controls			
EU11	Jenbacher J620 engine, 4,601 bhp with SCR and OC controls			
EU12	Jenbacher J620 engine, 4,601 bhp with SCR and OC controls			
EU13	Jenbacher J620 engine, 4,601 bhp with SCR and OC controls			
EU14	Jenbacher J620 engine, 4,601 bhp with SCR and OC controls			
EU15	Mesa Black Start emergency engine, 684 bhp, with Non-Selective Catalytic Reduction control			

Legal Authority

The emissions from the proposed project have been reviewed under the legal authority of RCW 70A.15.2210 and the applicable rules and regulations adopted thereunder. The proposed project, if operated as specified, will be in accordance with applicable rules and regulations, as set forth in Chapters 173-400 WAC and 173-460 WAC and the operation thereof, at the location proposed, will not result in ambient air quality standards being exceeded.

Therefore, it is ordered that the project as described in the Notice of Construction (NOC) application and more specifically detailed in plans, specifications, and other information submitted to the Washington State Department of Ecology (Ecology) is approved for construction and operation, provided the following conditions are satisfied:

Approval Conditions

1. Operational Limitations

- a. The permittee is subject to the requirements of WAC 173-407 for Greenhouse Gas Mitigation Requirements and Emissions Performance Standards for Power Plants.

- b. Fuel consumption at the VoltaGrid – QWA1 Electrical Generation Plant must be limited to 3,481 million standard cubic feet of natural gas per 12 months, quantified monthly and using 12-month rolling totals.
- c. **Equipment Restrictions**
 - i. All engines identified in Table 1 and 2 must be operated in accordance with applicable 40 C.F.R. 60, Subpart JJJJ requirements including but not limited to: certification by the manufacturer.
 - ii. All engines must only combust natural gas.
 - iii. The Mesa black start emergency engine must not exceed 100 hours of operation per 12 months, calculated on a rolling monthly basis.
 - iv. Each Jenbacher J620 engine must be equipped and operated with Selective Catalytic Reduction (SCR) and oxidation catalyst controls. The only prime power engines and electrical generation units approved for operation at the VoltaGrid – QWA1 – Electrical Generation Plant are those listed in Table 1.
 - v. The Mesa black start emergency engine must be equipped and operated with Non-Selective Catalytic Reduction (NSCR) control. The only emergency engine and electrical generation unit approved for operation at the VoltaGrid – QWA1- Electrical Generation Plant is listed in Table 1.
 - vi. The installation of any new or replacement engines 18 months after issuance of this Approval Order will require notification to Ecology that includes engine manufacturer's specification sheets. Ecology will decide whether new source review is required based on various factors including whether the new engines will have either an increased emission rate or result in an emission concentration that may increase community impacts over those evaluated for this Approval Order, or if an update to Best Available Control Technology analysis is necessary.
 - vii. Facility engines must meet the stack dimension requirements listed in Table 2.

Table 2: Engine Exhaust Stack Dimension Requirements

Quantity	Engine Size (bhp)	Minimum Stack Height (feet)	Maximum Stack Diameter (inches)
14	4,601	34'	24"
1	684	10.4'	4"

- viii. The permittee must have written verification from the engine manufacturer that each engine of the same make, model, and rated capacity installed at the facility uses the same electronic Programmable System Parameters, i.e., configuration parameters, in the electronic engine control unit.

d. Emission Limits

- i. Visible emissions from all engines must not exceed five percent opacity, except for a two-minute period after startup, as determined by 40 C.F.R. Part 60, Appendix A, Method 9.
- ii. There must be no visible emissions from any engine at the property boundary, as measured by 40 C.F.R. Part 60, Appendix A, Method 22.

Jenbacher J620 Prime Power Engines

- iii. Nitrogen Oxides (NO_x) emissions must be limited to 0.14 pounds per hour during steady state operations, as determined by 40 C.F.R. Part 60, Appendix A, Method 7E, or Method 320.
- iv. Carbon Monoxide (CO) emissions must be limited to 0.66 pounds per hour during steady state operations, as determined by 40 C.F.R. Part 60, Appendix A, Method 10, or Method 320.
- v. Volatile Organic Compounds (VOC) emissions must be limited to 0.17 pounds per hour during steady state operations, as determined by 40 C.F.R. Part 60, Appendix A, Method 25A and Method 18, or Method 320.
- vi. Particulate Matter (PM/PM₁₀/PM_{2.5}) emissions must be limited to 0.10 pounds per hour during steady state operations, as determined by 40 C.F.R. Part 60, Appendix A, Method 5.
- vii. Sulfur Dioxide (SO₂) emissions must be limited to 0.10 pounds per hour during steady state operations, as determined by 40 C.F.R. Part 60, Appendix A, Method 6, or Method 320.
- viii. Formaldehyde emissions must be limited to 0.10 pounds per hour during steady state operations, as determined by EPA Method 323, or EPA Method 320.
- ix. Ammonia emissions must be limited to 5 ppmv and 0.25 pounds per hour during steady state operations, as determined by BAAQMD Method ST-1B or EPA Method 320 or EPA CTM-027.
- x. Acetaldehyde emissions must be limited to 0.02 pounds per hour during steady state operations, as determined by EPA Method 320.

Mesa Black Start Emergency Engine

- xi. NO_x emissions must be limited to 0.13 pounds per hour during steady state operations, as determined by 40 C.F.R. Part 60, Appendix A, Method 7E, or Method 320.
- xii. CO emissions must be limited to 0.03 pounds per hour during steady state operations, as determined by 40 C.F.R. Part 60, Appendix A, Method 10, or Method 320.

- xiii. VOC emissions must be limited to 0.09 pounds per hour during steady state operations, as determined by 40 C.F.R. Part 60, Appendix A, Method 25A and Method 18, or Method 320.
- xiv. PM emissions must be limited to 0.09 pounds per hour during steady state operations, as determined by 40 C.F.R. Part 60, Appendix A, Method 5.
- xv. SO₂ emissions must be limited to 0.003 pounds per hour during steady state operations, as determined by 40 C.F.R. Part 60, Appendix A, Test Method 6, or Method 320.
- xvi. Formaldehyde emissions must be limited to 0.10 pounds per hour during steady state operations, as determined by EPA Method 323, or Method 320.
- xvii. Ammonia emissions must be limited to 0.03 pounds per hour during steady state operations, as determined by BAAQMD Method ST-1B or EPA Method 320 or EPA CTM-027.
- xviii. Total annual facility-wide emissions must not exceed the 12-month rolling average emissions for PM₁₀, PM_{2.5}, CO, NO_x, VOC, SO₂, NO₂, formaldehyde, ammonia, and acetaldehyde as listed in Table 3.

Table 3: Facility-Wide Emission Limits

Pollutant	Tons per year
NO _x	8.7
NO ₂	0.87
CO	41
VOC	10
PM ₁₀	6.9
PM _{2.5}	6.3
Formaldehyde	6.3
Ammonia	15
Acetaldehyde	1.3

2. Operation and Maintenance

- a. The Permittee must follow all recommended installation, configuration, operation, and maintenance provisions supplied by emission unit and component manufacturers.

- b. An operations and maintenance (O&M) manual(s) must be developed by the Permittee for each emission unit. The manufacturer's instructions may be referenced in the O&M manual(s).
 - i. The O&M manual(s) must include the following, at a minimum:
 - A. Normal operating parameters for emissions units.
 - B. A maintenance schedule for each emissions unit.
 - C. A description of the monitoring procedures.
 - D. Monitoring and record keeping requirements.
 - E. Actions for abnormal control system operation.
 - ii. The O&M manual(s) must be developed within 30 days of commencing operation of each emission unit.
- c. Emission units must be operated and maintained in accordance with the O&M manual(s).
- d. The Permittee must assess all complaints received. The Permittee must initiate corrective action in response to a complaint within three calendar days of receipt of the complaint.
- e. Reasonable precautions must be taken to prevent fugitive dust from becoming airborne, and the facility must follow a Fugitive Dust Control Plan (FDCP) to minimize emissions. The FDCP must be kept up to date and be available to Ecology for review upon request.
- f. A dust suppressant must be applied to the facility roadways at least annually to mitigate dust.

3. Monitoring and Recordkeeping

- a. The O&M manual(s) must be reviewed annually.
 - i. The date of each review and the person performing each review must be documented in the O&M manual(s).
 - ii. The O&M manual(s) must be updated to reflect any modifications to emission units or operating procedures.
- b. O&M records must be kept on premises in hard copy or readily available on-site electronically.
- c. For all air-quality related complaints, the following records must be kept:
 - i. A written record of the complaint received by the Permittee or forwarded to the Permittee.

- ii. The Permittee's action to investigate the validity of the complaint, any corrective action that was taken in response to the complaint, and the effectiveness of the remedial action.
- d. The date, time, duration, and cause of any periods where control technology equipment is out of service must be documented and maintained.
- e. All data required by this NOC Approval Order must be maintained in a readily retrievable manner for a period of five years and must be made available to authorized representatives of Ecology upon request. The following records are required to be collected and maintained.
 - i. Fuel receipts with amount of natural gas for each delivery to the facility.
 - ii. Monthly and 12-month rolling fuel usage.
 - iii. Annual number of start-ups for each engine.
 - iv. Annual gross electrical power in MWe generated by facility-wide operation of the Jenbacher J620 engines.
 - v. Monthly and 12-month rolling hours of operation for the Mesa emergency engine.
 - vi. Record of each operational period for each engine with the following information:
 - A. Date of engine operation.
 - B. Engine unit ID.
 - C. Reason for operating: an operational period for an engine will be identified as one of the following reasons for operating: Emergency Situations (for Mesa engine), stack testing, commissioning, maintenance checks, readiness testing, or prime power (Jenbacher J620 engines only).
 - D. Duration of operation, and percent of generator electrical load.
 - vii. Records of dust suppressant application.
- f. The Permittee must complete any additional monitoring or recordkeeping necessary to determine compliance with the requirements of this NOC Approval Order, as determined by Ecology.
- g. The Mesa emergency engine must be equipped with a properly installed and maintained non-resettable meter that records total operating hours.
- h. All engines must be connected to a properly installed and maintained fuel flow monitoring system (either certified physical or generator manufacturer provided software) that records the amount of fuel consumed by the engine.

4. Testing

- a. Initial testing is required for one Jenbacher J620 engine for NO_x, CO, VOC, formaldehyde, ammonia and opacity to show compliance with emission limits in Approval Conditions 1.c.iii. through 1.c.ix.
 - i. Testing must be conducted between 60 days of achieving maximum production, but not later than 180 days after initial startup.
 - ii. Three 60-minute test runs must be conducted within 10 percent of 100 percent peak load or highest achievable load.
 - iii. Source test analyzers and engine control unit data must be recorded at least once every minute during the test. Engine run time, torque output, and fuel usage must be recorded during each test run and included in the test report.
 - iv. If any source test of an engine shows non-compliance with any applicable emission standard in Approval Conditions 1.c.iii through 1.c.ix, then the engine must be repaired or replaced and then retested along with two other engines.
 - v. After initial testing, annual testing will be required for one engine, not previously tested.
- b. The Permittee must submit a test plan to Ecology for review and approval at least 30 days prior to source testing. Ecology may require a new protocol for re-test events conducted after a failed source test, when required, and Ecology may approve a shorter timeframe for submission for the re-test protocol. The test plan must include the following information, at a minimum:
 - i. Identification of each emission unit(s) to be tested.
 - ii. The operating parameters to be monitored during the test.
 - iii. A description of the emission units to be tested.
 - iv. The time and date of the proposed source test.
 - v. Identification and qualifications of the source test personnel.
 - vi. A description of the test methods and procedures to be used.
- c. Test reports must be submitted to Ecology within 60 days of completion of the source testing. Test reports must include the following information, at a minimum:
 - i. The information described in the test plan and any subsequent test plan approval letters.
 - ii. Field and analytical laboratory data.
 - iii. Quality assurance/quality control procedures and documentation.
 - iv. Analyzer data recorded during the test.

- v. A summary of results, reported in units and averaging periods consistent with the applicable emission limit.
 - vi. A summary of control system and equipment operating conditions.
 - vii. Copies of all field data.
 - viii. Chain of custody information.
 - ix. Calibration documentation.
 - x. Discussion of any abnormalities associated with the results.
 - xi. A statement signed by the senior management official of the testing firm certifying the validity of the source test report.
 - xii. Emission calculations.
- d. The Permittee must provide adequate sampling ports, safe sampling platforms, and access to platforms and utilities for sampling and testing, in accordance with 40 C.F.R. 60.8, 40 C.F.R. 63.7(d), and WAC 173-400-105(4).
- e. When information obtained by Ecology indicates the need to quantify emissions, Ecology may require the Permittee to conduct material analysis or air emission testing under WAC 173-400-105. This testing requirement is in addition to any testing required by Ecology in this NOC Approval Order, other permits, or other state or federal requirements.
- f. Alternate test methods and procedures may be proposed by the Permittee for Ecology review; a justification for the change must be included. Proposed alternates must not be utilized unless an approval is issued by Ecology, in writing, prior to the test.

5. Reporting

- a. All notifications, plans, reports, and other submittals must be submitted in a manner approved by Ecology.
- i. Washington State Department of Ecology
Air Quality Program
4601 N. Monroe Street
Spokane, WA 99205-1295

Email: emissions.inventory@ecy.wa.gov

OR AS DIRECTED.
- b. The Permittee must notify Ecology within one business day in the event of any control failure.
- c. The Permittee must notify Ecology within three business days in the event of any complaint.

- d. The Permittee must notify Ecology of commissioning of emission units within one week of initiating such activities, unless otherwise specified by Ecology. The notice must include:
 - i. Make, model, and serial number.
- e. The Permittee must submit results of all required monitoring to Ecology on an annual basis. Results must be submitted to Ecology by January 30th.
- f. The following information must be submitted to the Air Quality Program (AQP) at the address in Approval Condition 5.a.i by January 30 of each calendar year to report operation conditions for the previous calendar year. This information may be submitted with annual emissions information requested by the AQP.
 - i. Monthly and 12-month rolling total summary of all air contaminant emissions for criteria and toxic air pollutants, including all emissions from startup events.
 - ii. Monthly and 12-month rolling Mesa emergency generator hours of operation.
 - iii. Gross power generation with annual total as specified in Approval Condition 3.e.iv.
 - iv. Monthly and 12-month rolling total summary of fuel usage compared to Approval Condition 1.a.
- g. Written notification that the O&M manual(s) and FDCP described in Approval Condition 2 has been developed within 60 days after the issuance of this Order. A copy of the most current O&M manual and FDCP must be provided to Ecology if requested.
- h. The Permittee must notify Ecology within 30 days of the following events:
 - i. Commencement of construction of the project.
 - ii. Completion of the construction of the project.
 - iii. If construction or operation has been discontinued for more than 18 months.
- i. The Permittee must notify Ecology within 60 days (or longer as approved by Ecology) of the following events:
 - i. Changes in operation contrary to information submitted in the NOC application.
 - ii. Discontinued operations. This notification must include a shutdown status maintenance plan containing the following information, at a minimum:
 - A. Maintenance that will be performed during the shutdown to allow startup in a timely manner with minimum amount of work and emissions, (allowable emission levels as of the date of shutdown cannot increase upon reopening).
 - iii. Reactivating the facility following discontinued operations of 18 months or more. This notification must include a start-up plan containing the following information, at a minimum:

- A. Documentation that the shutdown maintenance was performed during shutdown to allow startup in a timely manner with minimum amount of work and emissions (allowable emissions levels as of the date of shutdown cannot increase upon reopening).
- B. Documentation of testing performed which demonstrates that units are still able to meet the parameters of this approval order after being inactive, or other documentation which demonstrates why testing is not necessary.

6. General Conditions

- a. **Activities Inconsistent with this Order** - Any activity undertaken by the Permittee, or others, in a manner that is inconsistent with the data and specifications submitted as part of the NOC application or this NOC Approval Order, must be subject to Ecology enforcement under applicable regulations.
- b. **Availability of Order** - Legible copies of this NOC Approval Order and any O&M manual(s) must be available to employees in direct operation of the equipment described in the NOC application and must be available for review upon request by Ecology.
- c. **Compliance Assurance Access** - Access to the source by representatives of Ecology or the United States Environmental Protection Agency (EPA) must be permitted upon request. Failure to allow access is grounds for enforcement action under the federal Clean Air Act or the Washington State Clean Air Act and may result in revocation of this NOC Approval Order.
- d. **Discontinuing Construction** - Approval to construct or modify a stationary source becomes invalid if construction is not commenced within eighteen months after receipt of the approval, or if construction is discontinued for a period of eighteen months or more. The permitting authority may extend the 18-month period upon a satisfactory showing by the permittee that an extension is justified.
- e. **Equipment Operation** - Operation of the facility must be conducted in compliance with all data and specifications submitted as part of the NOC application and in accordance with O&M manuals, unless otherwise approved in writing by Ecology.
- f. **Registration** - Periodic emissions inventory and other information may be requested by Ecology as part of Registration Program requirements listed in WAC 173-400-099 through 173-400-105. The requested information must be submitted within 30 days of receiving the request, unless otherwise specified. All fees must be paid by the date specified.
- g. **Violation Duration** - If the Permittee violates an approval condition in this NOC Approval Order, testing, recordkeeping, monitoring, or credible evidence will be used to establish the starting date of the violation. The violation is presumed to continue until testing, recordkeeping, monitoring, or other credible evidence indicates

compliance. A violation of an approval condition includes, but is not limited to, failure of air pollution control equipment, failure of other equipment resulting in increased emissions, or a failed source test indicating an exceedance of an emission limit.

- h. **Obligations Under Other Laws or Regulations** - Nothing in this NOC Approval Order must be construed so as to relieve the Permittee of its obligations under any state, local, or federal laws or regulations.
- i. **Maintaining Compliance** - It must not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the operations in order to maintain compliance with the conditions of this NOC Approval Order.
- j. **Visible Emissions** - No visible emissions from the source are allowed beyond the property line, as determined by 40 C.F.R. Part 60, Appendix A, Test Method 22.
- k. **Changes in Operations** - Changes in operation, discontinued operation, or inadequate maintenance plans or re-start plans (see “Reporting” requirements), may require a new or amended NOC Approval Order.

Authorization may be modified, suspended, or revoked in whole or part for cause, including, but not limited to, the following:

- Violation of any terms or conditions of this authorization.
- Obtaining this authorization by misrepresentation or failure to disclose all relevant facts.

The provisions of this authorization are severable and, if any provision of this authorization or application of any provision to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this authorization, must not be affected thereby.

Your Right to Appeal

You have a right to appeal this Approval Order to the Pollution Control Hearings Board (PCHB) within 30 days of the date of receipt. The appeal process is governed by RCW 43.21B and WAC 371-08. “Date of receipt” is defined in Chapter 43.21B.001(2) RCW.

To appeal, you must do all of the following within 30 days of the date of receipt of this Approval Order:

- File your notice of appeal and a copy of this Approval Order with the PCHB (see filing information below). “Filing” means actual receipt by the PCHB during regular business hours as defined in Chapter 371-08-305 WAC and -335. “Notice of appeal” is defined in Chapter 371-08-340 WAC.
- Serve a copy of your notice of appeal and this Order on the Department of Ecology by mail, in person, or by email (see addresses below).

You must also comply with other applicable requirements in Chapter 43.21B RCW and 371-08 WAC.

Address and Location Information

Filing with the PCHB

For the most current information regarding filing with the PCHB, visit: <https://elaho.wa.gov/> or call: 360-664-9160.

Service on Ecology

Street Address:

Department of Ecology

Attn: Appeals Processing Desk
300 Desmond Drive SE
Lacey, WA 98503

Mailing Address:

Department of Ecology

Attn: Appeals Processing Desk
PO Box 47608
Olympia, WA 98504-7608

Email Address:

ecologyappeals@ecy.wa.gov

Americans with Disabilities Act Information

ADA Accessibility

To request an ADA accommodation, email aqciero@ecy.wa.gov, call (509) 329-3400, or dial 711 to call through the Washington Telecommunications Relay for services like text telephone (TTY). Visit [Ecology.wa.gov/ADA](https://ecology.wa.gov/ADA) for more accessibility information.

Dated on July , 2026.

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