MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

August 30, 2017

PERMIT TO INSTALL
34-98C

ISSUED TO
Eaton Proving Grounds

LOCATED AT
19218 B Drive South
Marshall, Michigan

IN THE COUNTY OF
Calhoun

STATE REGISTRATION NUMBER
N2950

The Air Quality Division has approved this Permit to Install, pursuant to the delegation of authority from the Michigan Department of Environmental Quality. This permit is hereby issued in accordance with and subject to Section 5505(1) of Article II, Chapter I, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. Pursuant to Air Pollution Control Rule 336.1201(1), this permit constitutes the permittee's authority to install the identified emission unit(s) in accordance with all administrative rules of the Department and the attached conditions. Operation of the emission unit(s) identified in this Permit to Install is allowed pursuant to Rule 336.1201(6).

DATE OF RECEIPT OF ALL INFORMATION REQUIRED BY RULE 203: **August 9, 2017**	
DATE PERMIT TO INSTALL APPROVED: **August 30, 2017**	SIGNATURE:
DATE PERMIT VOIDED:	SIGNATURE:
DATE PERMIT REVOKED:	SIGNATURE:

PERMIT TO INSTALL

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Common Abbreviations / Acronyms

Common Acronyms		Pollutant / Measurement Abbreviations	
AQD	Air Quality Division	acfm	Actual cubic feet per minute
BACT	Best Available Control Technology	BTU	British Thermal Unit
CAA	Clean Air Act	°C	Degrees Celsius
CAM	Compliance Assurance Monitoring	CO	Carbon Monoxide
CEM	Continuous Emission Monitoring	CO_2e	Carbon Dioxide Equivalent
CFR	Code of Federal Regulations	dscf	Dry standard cubic foot
COM	Continuous Opacity Monitoring	dscm	Dry standard cubic meter
Department/ department	Michigan Department of Environmental Quality	°F	Degrees Fahrenheit
		gr	Grains
EU	Emission Unit	HAP	Hazardous Air Pollutant
FG	Flexible Group	Hg	Mercury
GACS	Gallons of Applied Coating Solids	hr	Hour
GC	General Condition	HP	Horsepower
GHGs	Greenhouse Gases	H_2S	Hydrogen Sulfide
HVLP	High Volume Low Pressure*	kW	Kilowatt
ID	Identification	lb	Pound
IRSL	Initial Risk Screening Level	m	Meter
ITSL	Initial Threshold Screening Level	mg	Milligram
LAER	Lowest Achievable Emission Rate	mm	Millimeter
MACT	Maximum Achievable Control Technology	MM	Million
MAERS	Michigan Air Emissions Reporting System	MW	Megawatts
MAP	Malfunction Abatement Plan	NMOC	Non-methane Organic Compounds
MDEQ	Michigan Department of Environmental Quality	NO_x	Oxides of Nitrogen
		ng	Nanogram
MSDS	Material Safety Data Sheet	PM	Particulate Matter
NA	Not Applicable	PM10	Particulate Matter equal to or less than 10 microns in diameter
NAAQS	National Ambient Air Quality Standards		
NESHAP	National Emission Standard for Hazardous Air Pollutants	PM2.5	Particulate Matter equal to or less than 2.5 microns in diameter
NSPS	New Source Performance Standards	pph	Pounds per hour
NSR	New Source Review	ppm	Parts per million
PS	Performance Specification	ppmv	Parts per million by volume
PSD	Prevention of Significant Deterioration	ppmw	Parts per million by weight
PTE	Permanent Total Enclosure	psia	Pounds per square inch absolute
PTI	Permit to Install	psig	Pounds per square inch gauge
RACT	Reasonable Available Control Technology	scf	Standard cubic feet
ROP	Renewable Operating Permit	sec	Seconds
SC	Special Condition	SO_2	Sulfur Dioxide
SCR	Selective Catalytic Reduction	TAC	Toxic Air Contaminant
SNCR	Selective Non-Catalytic Reduction	Temp	Temperature
SRN	State Registration Number	THC	Total Hydrocarbons
TEQ	Toxicity Equivalence Quotient	tpy	Tons per year
USEPA/EPA	United States Environmental Protection Agency	µg	Microgram
		µm	Micrometer or Micron
VE	Visible Emissions	VOC	Volatile Organic Compounds
		yr	Year

*For HVLP applicators, the pressure measured at the gun air cap shall not exceed 10 psig.

GENERAL CONDITIONS

1. The process or process equipment covered by this permit shall not be reconstructed, relocated, or modified, unless a Permit to Install authorizing such action is issued by the Department, except to the extent such action is exempt from the Permit to Install requirements by any applicable rule. **(R 336.1201(1))**

2. If the installation, construction, reconstruction, relocation, or modification of the equipment for which this permit has been approved has not commenced within 18 months, or has been interrupted for 18 months, this permit shall become void unless otherwise authorized by the Department. Furthermore, the permittee or the designated authorized agent shall notify the Department via the Supervisor, Permit Section, Air Quality Division, Michigan Department of Environmental Quality, P.O. Box 30260, Lansing, Michigan 48909-7760, if it is decided not to pursue the installation, construction, reconstruction, relocation, or modification of the equipment allowed by this Permit to Install. **(R 336.1201(4))**

3. If this Permit to Install is issued for a process or process equipment located at a stationary source that is not subject to the Renewable Operating Permit program requirements pursuant to R 336.1210, operation of the process or process equipment is allowed by this permit if the equipment performs in accordance with the terms and conditions of this Permit to Install. **(R 336.1201(6)(b))**

4. The Department may, after notice and opportunity for a hearing, revoke this Permit to Install if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of this permit or is violating the Department's rules or the Clean Air Act. **(R 336.1201(8), Section 5510 of Act 451, PA 1994)**

5. The terms and conditions of this Permit to Install shall apply to any person or legal entity that now or hereafter owns or operates the process or process equipment at the location authorized by this Permit to Install. If the new owner or operator submits a written request to the Department pursuant to R 336.1219 and the Department approves the request, this permit will be amended to reflect the change of ownership or operational control. The request must include all of the information required by subrules (1)(a), (b), and (c) of R 336.1219 and shall be sent to the District Supervisor, Air Quality Division, Michigan Department of Environmental Quality. **(R 336.1219)**

6. Operation of this equipment shall not result in the emission of an air contaminant which causes injurious effects to human health or safety, animal life, plant life of significant economic value, or property, or which causes unreasonable interference with the comfortable enjoyment of life and property. **(R 336.1901)**

7. The permittee shall provide notice of an abnormal condition, start-up, shutdown, or malfunction that results in emissions of a hazardous or toxic air pollutant which continue for more than one hour in excess of any applicable standard or limitation, or emissions of any air contaminant continuing for more than two hours in excess of an applicable standard or limitation, as required in Rule 912, to the Department. The notice shall be provided not later than two business days after start-up, shutdown, or discovery of the abnormal condition or malfunction. Written reports, if required, must be filed with the Department within 10 days after the start-up or shutdown occurred, within 10 days after the abnormal conditions or malfunction has been corrected, or within 30 days of discovery of the abnormal condition or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5). **(R 336.1912)**

8. Approval of this permit does not exempt the permittee from complying with any future applicable requirements which may be promulgated under Part 55 of 1994 PA 451, as amended or the Federal Clean Air Act.

9. Approval of this permit does not obviate the necessity of obtaining such permits or approvals from other units of government as required by law.

10. Operation of this equipment may be subject to other requirements of Part 55 of 1994 PA 451, as amended and the rules promulgated thereunder.

11. Except as provided in subrules (2) and (3) or unless the special conditions of the Permit to Install include an alternate opacity limit established pursuant to subrule (4) of R 336.1301, the permittee shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of density greater than the most stringent of the following. The grading of visible emissions shall be determined in accordance with R 336.1303. **(R 336.1301)**
    a) A six-minute average of 20 percent opacity, except for one six-minute average per hour of not more than 27 percent opacity.
    b) A visible emission limit specified by an applicable federal new source performance standard.
    c) A visible emission limit specified as a condition of this Permit to Install.

12. Collected air contaminants shall be removed as necessary to maintain the equipment at the required operating efficiency. The collection and disposal of air contaminants shall be performed in a manner so as to minimize the introduction of contaminants to the outer air. Transport of collected air contaminants in Priority I and II areas requires the use of material handling methods specified in R 336.1370(2). **(R 336.1370)**

13. The Department may require the permittee to conduct acceptable performance tests, at the permittee's expense, in accordance with R 336.2001 and R 336.2003, under any of the conditions listed in R 336.2001. **(R 336.2001)**

SPECIAL CONDITIONS

EMISSION UNIT SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Emission Unit ID	Emission Unit Description (Process Equipment & Control Devices)	Flexible Group ID
EU-GENERATOR	Kohler Power System, Ford V-8 Natural Gas turbocharged engine Mod. LSG 8757-600S-1A, 100 KW, 1.2 MM BTU/HR	NA
EU-HEATER	Air handling units, heaters, ovens, and hot water boilers; each burning natural gas fuel with a total heat capacity of 12.8 MMBTU/hr	NA
EU-TESTCELL1	Engine dynamometer test cell	FG-TESTCELLS
EU-TESTCELL2	Engine dynamometer test cell	FG-TESTCELLS
EU-TESTCELL3	Engine dynamometer test cell	FG-TESTCELLS
Changes to the equipment described in this table are subject to the requirements of R 336.1201, except as allowed by R 336.1278 to R 336.1290.		

The following conditions apply to:
EU-GENERATOR

DESCRIPTION: Kohler Power System, Ford V-8 Natural Gas turbocharged engine Mod. LSG 8757-600S-1A, 100 KW, 1.2 MM BTU/HR

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT: NA

I. EMISSION LIMITS

NA

II. MATERIAL LIMITS

NA

III. PROCESS/OPERATIONAL RESTRICTIONS

NA

IV. DESIGN/EQUIPMENT PARAMETERS

NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. The permittee shall keep, in a satisfactory manner, monthly and 12-month rolling time period natural gas use records for EU-GENERATOR. All records shall be kept on file for a period of at least five years and made available to the Department upon request. **(R 336.1205 (1)(a) and (b))**

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTIONS

NA

IX. OTHER REQUIREMENTS

NA

The following conditions apply to:
EU-HEATER

DESCRIPTION: Air handling units, heaters, ovens, and hot water boilers; each burning natural gas fuel with a total heat capacity of 12.8 MMBTU/hr

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT: NA

I. EMISSION LIMITS

NA

II. MATERIAL LIMITS

1. The natural gas usage for EU-HEATER shall not exceed 17 million cubic feet per 12-month rolling time period as determined at the end of each calendar month. **(R 336.1205 (1)(a) and (b))**

III. PROCESS/OPERATIONAL RESTRICTIONS

NA

IV. DESIGN/EQUIPMENT PARAMETERS

NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. The permittee shall keep, in a satisfactory manner, monthly and 12-month rolling time period natural gas use records for EU-HEATER. All records shall be kept on file for a period of at least five years and made available to the Department upon request. **(R 336.1205 (1)(a) and (b))**

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTIONS

NA

IX. OTHER REQUIREMENTS

NA

FLEXIBLE GROUP SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FG-TESTCELLS	Three engine dynamometer test cells.	EU-TESTCELL1 EU-TESTCELL2 EU-TESTCELL3
FGFACILITY	All process equipment source-wide including equipment covered by other permits, grand-fathered equipment and exempt equipment.	

The following conditions apply to:
FG-TESTCELLS

DESCRIPTION: Three engine dynamometer test cells.

Emission Units: EU-TESTCELL1, EU-TESTCELL2, EU-TESTCELL3

POLLUTION CONTROL EQUIPMENT: NA

I. EMISSION LIMITS

NA

II. MATERIAL LIMITS

1. The unleaded gasoline usage for FG-TESTCELLS shall not exceed 1,898 gallons per calendar day. **(R 336.1225**, **40 CFR 52.21 (c) and (d))**

2. The diesel usage for FG-TESTCELLS shall not exceed 1,200 gallons per calendar day. **(R 336.1225**, **40 CFR 52.21 (c) and (d))**

3. The total combined fuel usage of diesel and unleaded gasoline in FG-TESTCELLS shall not exceed 30,000 gallons per 12-month rolling time period as determined at the end of each calendar month. **(R 336.1205 (1)(a) and (3), 40 CFR 52.21 (c) and (d))**

4. The permittee shall not test engines burning fuels other than gasoline or diesel in FG-TESTCELLS. **(R 336.1205 (1)(a) and (3), R 336.1224, R 336.1225, 40 CFR 52.21(c) & (d))**

III. PROCESS/OPERATIONAL RESTRICTIONS

NA

IV. DESIGN/EQUIPMENT PARAMETERS

1. The permittee shall install and operate a device to measure the total fuel usage in FG-TESTCELLS. **(R 336.1205(1)(a) & (3), R 336.1225, 40 CFR 52.21(d))**

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. The permittee shall keep, in a satisfactory manner, daily, monthly, and 12-month rolling time period unleaded gasoline use records for FG-TESTCELLS. The permittee shall keep all records on file at the facility and make them available to the Department upon request. **(R 336.1205 (1)(a) and (b), 40 CFR 52.21 (c) and (d))**

2. The permittee shall keep, in a satisfactory manner, daily, monthly, and 12-month rolling time period diesel use records for FG-TESTCELLS. The permittee shall keep all records on file at the facility and make them available to the Department upon request. **(R 336.1205 (1)(a) and (3), R 336.1225, 40 CFR 52.21 (c) and (d))**

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTIONS

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Diameter/Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SV-TESTCELL1	5	58	R 336.1225, 40 CFR 52.21 (c) and (d)
2. SV-TESTCELL2	5	58	R 336.1225, 40 CFR 52.21 (c) and (d)
3. SV-TESTCELL3	5	58	R 336.1225, 40 CFR 52.21 (c) and (d)

IX. OTHER REQUIREMENTS

NA

The following conditions apply Source-Wide to:
FGFACILITY

DESCRIPTION: All process equipment source-wide including equipment covered by other permits, grand-fathered equipment and exempt equipment.

I. EMISSION LIMITS

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. NOx	95.8 tpy	12-month rolling time period as determined at the end of each calendar month	FGFACILITY	SC VI.1	R 336.1205(1)(a) and (b), 40 CFR 52.21(c) and (d)
2. CO	89.9 tpy	12-month rolling time period as determined at the end of each calendar month	FGFACILITY	SC VI.2	R 336.1205(1)(a) and (b), 40 CFR 52.21(d)

II. MATERIAL LIMITS

NA

III. PROCESS/OPERATIONAL RESTRICTIONS

NA

IV. DESIGN/EQUIPMENT PARAMETERS

NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. The permittee shall keep, in a satisfactory manner, monthly and 12-month rolling time period NOx emission calculation records for FG-FACILITY, in accordance with Appendix A. All records shall be kept on file for a period of at least five years and made available to the Department upon request. **(R 336.1205 (1)(a) and (b), 40 CFR 52.21(c) and (d))**

2. The permittee shall keep, in a satisfactory manner, monthly and 12-month rolling time period CO emission calculation records for FG-FACILITY, in accordance with Appendix A. All records shall be kept on file for a period of at least five years and made available to the Department upon request. **(R 336.1205 (1)(a) and (b), 40 CFR 52.21(d))**

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTIONS

NA

IX. OTHER REQUIREMENTS

NA

APPENDIX A

EU-GENERATOR Emissions

Emission Calculation Method:
EU-GENERATOR NOx and CO emission rates are based on emission factors from the USEPA FIRE system, using SCC code 2-02-002-54. The emission rates are determined by taking the corresponding emission factor, in pounds per million British Thermal Units (MMBTU), multiplied by the heat input of the generator.

If emission factors from vendor data or from source specific testing (stack testing) are available for EU-GENERATOR, the permittee shall use the source-specific emission factor. If an emission factor other than those listed below are used, the permittee shall obtain the approval of the AQD District Supervisor before using alternate emission factors to calculate emissions.

The heat input is calculated by recording the amount of natural gas utilized by the generator per month (in scf) multiplied by the heating value of the fuel. The heating value of the natural gas shall be defined as 1020 BTU's per standard cubic foot of gas, unless the permittee has documentation showing the actual heating value of the gas is different, such as fuel receipts, or a purchase contract, tariff sheet, or transportation contract from the fuel supplier.

EU-GENERATOR NOx emission factor	=	4.1 lbs / MMBTU
Annual EU-GENERATOR NOx emissions (tons/12 month rolling time period as determined at the end of each calendar month)	=	$\sum_{i=1}^{12}$ (EF (lb/MMBTU) x Heat Input $_i$ (MMBTU)) / 2000 EF = the NOx emission factor (lb/MMBTU) Heat input $_i$ = the heating value of the natural gas multiplied by the amount of gas utilized by the engine, as calculated below, during calendar month i (MMBTU/month)

EU-GENERATOR CO emission factor	=	0.32 lbs / MMBTU
Annual EU-GENERATOR CO emissions (tons/12 month rolling time period as determined at the end of each calendar month)	=	$\sum_{i=1}^{12}$ (EF (lb/MMBTU) x Heat Input $_i$ (MMBTU)) / 2000 EF = the CO emission factor (lb/MMBTU) Heat input $_i$ = the heating value of the natural gas multiplied by the amount of gas utilized by the engine, as calculated below, during calendar month i (MMBTU/month)

The Heat Input for the generator shall be calculated using the following method:

EU-GENERATOR natural gas heating value	=	0.00102 MMBTU / SCF (Other heating value may be used as long as it is documented in information from the fuel supplier such as fuel receipts, purchase contract, tariff sheet, or transportation contract)
Annual EU-GENERATOR Heat Input (MMBTU/12 month rolling time period as determined at the end of each calendar month)	=	$\sum_{i=1}^{12}$ HV (MMBTU/SCF) x Fuel $_i$ (SCF/month) HV = the heating value from above for the fuel (MMBTU / scf) Fuel $_i$ = the amount of natural gas used by the engine during calendar month i (scf / month)

EU-HEATER Emissions

Emission Calculation Method:
EU-HEATER NOx and CO emission rates are factors from the USEPA FIRE system, using SCC code: 1-02-006-03. The emission rates are determined by taking the corresponding emission factor, in pounds per million standard cubic feet of natural gas, multiplied by the amount of natural gas utilized per month.

If emission factors from vendor data or from source specific testing (stack testing) are available for EU-HEATER, the permittee shall use the source-specific emission factor. If an emission factor other than those listed below are used, the permittee shall obtain the approval of the AQD District Supervisor before using alternate emission factors to calculate emissions.

EU-HEATER NOx emission factor	=	100 pounds per million scf of gas (lb / MMscf)
Annual EU-HEATER NOx emissions (tons/12 month rolling time period as determined at the end of each calendar month)	=	$\sum_{i=1}^{12}$ (EF (lb/MMSCF) x Gas $_i$ (MMSCF)) / 2000 EF = the emission factors for NOx (lb / MMscf) Gas $_i$ = the amount of natural gas used by EU-HEATER during calendar month i (MMscf/month)

EU-HEATER CO emission factor	=	84 pounds per million scf of gas (lb / MMscf)
Annual EU-HEATER CO emissions (tons/12 month rolling time period as determined at the end of each calendar month)	=	$\sum_{i=1}^{12}$ (EF (lb/MMSCF) x Gas $_i$ (MMSCF)) / 2000 EF = the emission factor for CO (lb / MMscf) Gas $_i$ = the amount of natural gas processed by EU-HEATER during calendar month i (MMscf/month)

FG-TESTCELLS Emissions: Diesel

Emission Calculation Method:
FG-TESTCELLS NOx and CO emission rates are based on stack testing of dynamometer operations. The emission rates are determined by taking the corresponding emission factor, in pounds per gallon, multiplied by the amount of diesel fuel utilized per month.

FG-TESTCELLS NOx emission factor	=	0.604 pound NOx per gallon diesel fuel (lb/gal) (The most recent emission factor verified by compliance stack testing may be used instead.)
Annual FG-TESTCELLS NOx emissions (tons/12 month rolling time period as determined at the end of each calendar month)	=	$\sum_{i=1}^{12}$ (EF (lb/gal) x Fuel $_i$ (gal)) / 2000 EF = the dynamometer NOx emission factors from above, in lb per gal Fuel $_i$ = the amount of diesel fuel used by FG-TESTCELLS during calendar month i., in gallons

FG-TESTCELLS CO emission factor (lb/MMscf)	=	0.50 pound CO per gallon diesel fuel (lb/gal) (The most recent emission factor verified by compliance stack testing may be used instead.)
Annual FG-TESTCELLS CO emissions (tons/12 month rolling time period as determined at the end of each calendar month)	=	$\sum_{i=1}^{12}$ (EF (lb/gal) x Fuel $_i$ (gal)) / 2000 EF = the dynamometer Carbon Monoxide emission factors from above, in lb per gal Fuel $_i$ = the amount of diesel fuel used by FG-TESTCELLS during calendar month i., in gallons

FG-TESTCELLS Emissions: Gasoline

Emission Calculation Method:
FG-TESTCELLS NOx and CO emission rates are based on stack testing of during dynamometer operations. The emission rates are determined by taking the corresponding emission factor, in pounds per gallon, multiplied by the amount of unleaded gasoline utilized per month.

FG-TESTCELLS NOx emission factor	=	0.18 pound NOx per gallon unleaded gasoline (lb/gal) (The most recent emission factor verified by compliance stack testing may be used instead.)
Annual FG-TESTCELLS NOx emissions (tons/12 month rolling time period as determined at the end of each calendar month)	=	$\sum_{i=1}^{12}$ (EF (lb/gal) x Fuel $_i$ (gal)) / 2000 EF = the NOx emission factors from above, in lb per gal Fuel $_i$ = the amount of unleaded gasoline used by FG-TESTCELLS during calendar month i., in gallons

FG-TESTCELLS CO emission factor	=	5.40 pounds CO per Gallon (lb/gal) (The most recent emission factor verified by compliance stack testing may be used instead.)
Annual FG-TESTCELLS CO (tons/12 month rolling time period as determined at the end of each calendar month)	=	$\sum_{i=1}^{12}$ (EF (lb/gal) x Fuel $_i$ (gal))/2000 EF = the CO emission factors from above, in lb per gal Fuel $_i$ = the amount of unleaded gasoline used by FG-TESTCELLS during calendar month i., in gallons

FG-FACILITY Emissions

Emission Calculation Method:
The FG-FACILITY NOx and CO emission rates are based on the sum of emissions from each permitted emission unit (calculated as described above), and emissions from grandfathered and exempt equipment.

Annual FG-FACILITY NOx emissions (tons/12 month rolling time period as determined at the end of each calendar month)	=	$\sum_{i=1}^{12}$ FACILITY$_i$ FACILITY$_i$ = the sum of emissions from all permitted, grand-fathered, and exempt equipment, in tons per month
Annual FG-FACILITY CO emissions (tons/12 month rolling time period as determined at the end of each calendar month)	=	$\sum_{i=1}^{12}$ FACILITY$_i$ FACILITY$_i$ = the sum of emissions from all permitted, grand-fathered, and exempt equipment, in tons per month