



DIVISION OF ENVIRONMENTAL QUALITY

Sarah Huckabee Sanders
GOVERNOR

Shane E. Khoury
SECRETARY

January 5, 2026

Via email to: mmontfort@wsgr.com & First Class Mail

Michael Montfort
Manager
Groot LLC
2801 Centerville Road, 1st Floor
PMB 160
Wilmington, DE 19808

Re: Notice of Final Permitting Decision; Permit No. 2507-AOP-R0

Dear Mr. Montfort,

After considering the application, any public comments, and other applicable materials as required by APC&EC 8 CAR § 11-211 and Ark. Code Ann. § 8-4-101 et seq., this notice of final permitting decision is provided for:

Groot LLC
South of Rainer Road and East of Waverly Road
West Memphis, AR 72301

Permit Number: 2507-AOP-R0

Permitting Decision: approval with permit conditions as set forth in final Permit No. 2507-AOP-R0

Accessing the Permitting Decision and Response to Comments, if any:
<https://www.adeq.state.ar.us/downloads/WebDatabases/PermitsOnline/Air/2507-AOP-R0.pdf>.

Accessing the Statement of Basis:
<https://www.adeq.state.ar.us/downloads/WebDatabases/PermitsOnline/Air/2507-AOP-R0-SOB.pdf>.

The permitting decision is effective on the date stated in the attached Certificate of Service unless a Commission review has been properly requested under Arkansas Pollution Control & Ecology Commission's Administrative Procedures, 8 CAR pt. 11, within thirty (30) days after service of this decision.

The applicant or permittee and any other person submitting public comments on the record may request an adjudicatory hearing and Commission review of the final permitting decisions as provided under Subpart 6 of 8 CAR pt. 11. Such a request shall be in the form and manner

ARKANSAS DEPARTMENT OF ENERGY AND ENVIRONMENT

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required by 8 CAR § 11-603, including filing a written Request for Hearing with the Commission secretary at 3800 Richards Rd, North Little Rock, Arkansas 72117. If you have any questions about filing the request, please call the Commission at 501-682-7890.

This permit is your authority to construct, operate, and maintain the equipment and control apparatus as set forth in your application initially received on 9/25/2025.

Sincerely,

A handwritten signature in cursive script, appearing to read "Demetria Kimbrough".

Demetria Kimbrough
Deputy Director, Office of Air Quality

Enclosure: Certificate of Service

CERTIFICATE OF SERVICE

I, Natasha Oates, hereby certify that the final permit decision notice has been mailed by first class mail to Groot LLC, 2801 Centerville Road, 1st Floor PMB 160, Wilmington, DE, 19808, on this 5th day of January, 2026.



Natasha Oates, Program Coordinator, Permits, Office
of Air Quality



DIVISION OF ENVIRONMENTAL QUALITY

OPERATING AIR PERMIT

PERMIT NUMBER: 2507-AOP-R0

IS ISSUED TO:

Groot LLC

South of Rainer Road and East of Waverly Road

West Memphis, AR 72301

Crittenden County

AFIN: 18-01011

PURSUANT TO THE RULES OF THE ARKANSAS OPERATING AIR PERMIT PROGRAM, 8 CAR PT. 42: THIS PERMIT AUTHORIZES THE ABOVE REFERENCED PERMITTEE TO INSTALL, OPERATE, AND MAINTAIN THE EQUIPMENT AND EMISSION UNITS DESCRIBED IN THE PERMIT APPLICATION AND ON THE FOLLOWING PAGES. THIS PERMIT IS VALID BETWEEN:

January 5, 2026 AND January 4, 2031

THE PERMITTEE IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:

A handwritten signature in dark ink, appearing to read "Demetria Kimbrough", written over a horizontal line.

Demetria Kimbrough
Deputy Director, Office of Air Quality

January 5, 2026

Date

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Groot LLC
Permit #: 2507-AOP-R0
AFIN: 18-01011

List of Acronyms and Abbreviations

Ark. Code Ann.	Arkansas Code Annotated
AFIN	Arkansas DEQ Facility Identification Number
C.F.R.	Code of Federal Regulations
CO	Carbon Monoxide
COMS	Continuous Opacity Monitoring System
HAP	Hazardous Air Pollutant
Hp	Horsepower
lb/hr	Pound Per Hour
NESHAP	National Emission Standards (for) Hazardous Air Pollutants
MVAC	Motor Vehicle Air Conditioner
No.	Number
NO _x	Nitrogen Oxide
NSPS	New Source Performance Standards
PM	Particulate Matter
PM ₁₀	Particulate Matter Equal To Or Smaller Than Ten Microns
PM _{2.5}	Particulate Matter Equal To Or Smaller Than 2.5 Microns
SNAP	Significant New Alternatives Program (SNAP)
SO ₂	Sulfur Dioxide
SSM	Startup, Shutdown, and Malfunction Plan
Tpy	Tons Per Year
UTM	Universal Transverse Mercator
VOC	Volatile Organic Compound

Groot LLC
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SECTION I: FACILITY INFORMATION

PERMITTEE:	Groot LLC
AFIN:	18-01011
PERMIT NUMBER:	2507-AOP-R0
FACILITY ADDRESS:	South of Rainer Road and East of Waverly Road West Memphis, AR 72301
MAILING ADDRESS:	2801 Centerville Road, 1st Floor PMB 160 Wilmington, DE 19808
COUNTY:	Crittenden County
CONTACT NAME:	Michael Montfort
CONTACT POSITION:	Authorized Signatory
TELEPHONE NUMBER:	(202) 973-8815
REVIEWING ENGINEER:	Shawn Hutchings
UTM North South (Y):	Zone 15: 3888760.02 m
UTM East West (X):	Zone 15: 753541.6 m

SECTION II: INTRODUCTION

Summary of Permit Activity

Groot LLC is a data processing, hosting and related services center located south of Rainer Road and east of Waverly Road near West Memphis, AR. The facility operates multiple diesel and hydrotreated vegetable oil (HVO) fuel-fired engines to provide emergency power and support the facility, associated tanks, cooling towers, and roadway emissions. This permit is the initial permit for the facility.

Process Description

Groot LLC is a data processing, hosting and related services center. The facility is permitted to operate up to 238 diesel and hydrotreated vegetable oil (HVO) fuel-fired emergency engines (SN-01 through SN-05). Each engine has an associated fuel tank (SN-06 and SN-07). The permit also includes 60 cooling towers (SN-08) and roadway emissions (SN-09).

Rules and Regulations

The following table contains the rules and regulations applicable to this permit.

Rules and Regulations
Arkansas Air Pollution Control Code, 8 CAR pt. 40, effective March 14, 2016
Rules of the Arkansas Plan of Implementation for Air Pollution Control, 8 CAR pt. 41, effective May 6, 2022
Rules of the Arkansas Operating Air Permit Program, 8 CAR pt. 42, effective March 14, 2016
40 C.F.R 60 Subpart IIII—Standards of Performance for Stationary Compression Ignition Internal Combustion Engines
40 C.F.R. 63 Subpart ZZZZ—National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

Emission Summary

The following table is a summary of emissions from the facility. This table, in itself, is not an enforceable condition of the permit.

Groot LLC
 Permit #: 2507-AOP-R0
 AFIN: 18-01011

EMISSION SUMMARY				
Source Number	Description	Pollutant	Emission Rates	
			lb/hr	tpy
Total Allowable Emissions		PM	422.7	18.4
		PM ₁₀	421.8	14.6
		PM _{2.5}	See Note*	
		SO ₂	26.0	0.8
		VOC	423.4	53.0
		CO	4138.4	57.8
		NO _x	17841.7	249.1
HAPs		Total HAPs	11.78	4.96
01	Group 1 Emergency Engines (232) Hourly are for EACH engine. TPY is all 232 total.	PM	1.8	5.6
		PM ₁₀	1.8	5.6
		SO ₂	0.1	0.2
		VOC	1.7	5.4
		CO	17.7	56.0
		NO _x	76.3	242.0
		Total HAPs	0.04	0.14
02	Group 2 Engines (2) lb/hr and tpy limits are for EACH engine	PM	0.3	0.1
		PM ₁₀	0.3	0.1
		SO ₂	0.1	0.1
		VOC	0.6	0.1
		CO	5.3	0.3
		NO _x	17.7	0.9
		Total HAPs	0.01	0.01
03	Group 3 Engines (2) lb/hr and tpy limits are for EACH engine	PM	0.3	0.1
		PM ₁₀	0.3	0.1
		SO ₂	1.1	0.1
		VOC	1.3	0.1
		CO	3.7	0.2
		NO _x	16.0	0.8
		Total HAPs	0.02	0.01
04	Group 4 Engine (1)	PM	0.7	0.1
		PM ₁₀	0.7	0.1
		SO ₂	0.1	0.1
		VOC	1.1	0.1
		CO	10.5	0.6
		NO _x	35.4	1.8
		Total HAPs	0.02	0.01
05	Group 5 Engine (1)	PM	0.3	0.1
		PM ₁₀	0.3	0.1
		SO ₂	0.3	0.1

Groot LLC
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EMISSION SUMMARY				
Source Number	Description	Pollutant	Emission Rates	
			lb/hr	tpy
		VOC	0.3	0.1
		CO	3.5	0.2
		NO _x	37.3	1.9
		Total HAPs	0.03	0.01
06	Group 1 Tanks	VOC	0.1	0.2
		Total HAPs	0.01	0.01
07	Auxiliary Tanks	VOC	0.1	0.1
		Total HAPs	0.01	0.01
08	Cooling Towers (60) Lb/hr and tpy are for are for all 60 cooling towers combined	PM	2.8	11.9
		PM ₁₀	1.9	8.3
09	Roads	PM	0.1	0.3
		PM ₁₀	0.1	0.1

*PM_{2.5} limits are source specific, if required. Not all sources have PM_{2.5} limits.

**HAPs included in the VOC totals. Other HAPs are not included in any other totals unless specifically stated.

Groot LLC
Permit #: 2507-AOP-R0
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SECTION III: PERMIT HISTORY

Permit 2507-AOP-R0 is the first permit for the facility.

SECTION IV: SPECIFIC CONDITIONS

SN-01, 02, 03, 04, 05 Engines

Source Description

SN-01 consists of 232 individual Tier 2 engines powering emergency generators. The engines can use diesel fuel or hydrotreated vegetable oil (HVO). These are equipment ID numbers EPB1G1 through EPB1G32, EPB1CG1 through EPB1CG12, EPB2G1 through EPB2G32, EPB2CG1 through EPB2CG12, EPB3G1 through EPB3G36, EPB3CG1 through EPB3CG12, EPB4G1 through EPB4G36, EPB4CG1 through EPB4CG12, EPB5G1 through EPB5G36, EPB5CG1 through EPB5CG12.

SN-02 is two emergency engines powering generators. The engines can use diesel fuel or hydrotreated vegetable oil (HVO). These are equipment ID numbers EPSEG1 and EPWH.

SN-03 are two emergency fire pump engines. The engines can use diesel fuel or hydrotreated vegetable oil (HVO). These are equipment ID numbers EPFP1 and EPFP2.

SN-04 is an emergency engine powering a generator. The engine can use diesel fuel or hydrotreated vegetable oil (HVO). This engine is equipment ID number EPHUBG1.

SN-05 is an emergency engine powering a generator. The engine can use diesel fuel or hydrotreated vegetable oil (HVO). This engine is equipment ID number EPWW.

Specific Conditions

1. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by compliance with Specific Conditions 5 through 51. [8 CAR § 41-401 et seq. and 40 C.F.R. § 52 Subpart E]

SN	Description	Pollutant	lb/hr	tpy
01	Group 1 Emergency Engines (232) Hourly are for EACH engine. TPY is all 232 total.	PM ₁₀	1.8	5.6
		SO ₂	0.1	0.2
		VOC	1.7	5.4
		CO	17.7	56.0
		NO _x	76.3	242.0
02	Group 2 Engines (2) lb/hr and tpy limits are for EACH engine	PM ₁₀	0.3	0.1
		SO ₂	0.1	0.1
		VOC	0.6	0.1
		CO	5.3	0.3
		NO _x	17.7	0.9

SN	Description	Pollutant	lb/hr	tpy
03	Group 3 Engines (2) lb/hr and tpy limits are for EACH engine	PM ₁₀	0.3	0.1
		SO ₂	1.1	0.1
		VOC	1.3	0.1
		CO	3.7	0.2
		NO _x	16.0	0.8
04	Group 4 Engine (1)	PM ₁₀	0.7	0.1
		SO ₂	0.1	0.1
		VOC	1.1	0.1
		CO	10.6	0.6
		NO _x	35.4	1.8
05	Group 5 Engine (1)	PM ₁₀	0.3	0.1
		SO ₂	0.3	0.1
		VOC	0.3	0.1
		CO	3.5	0.2
		NO _x	37.3	1.9

2. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by compliance with Specific Conditions 5 through 51. [8 CAR § 40-701 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

SN	Description	Pollutant	lb/hr	tpy
01	Group 1 Emergency Engines (232) Hourly are for EACH engine. TPY is all 232 total.	PM	1.8	5.6
		HAPs	0.04	0.14
02	Group 2 Engines (2) lb/hr and tpy limits are for EACH engine	PM	0.3	0.1
		HAPs	0.01	0.01
03	Group 3 Engines (2) lb/hr and tpy limits are for EACH engine	PM	0.3	0.1
		HAPs	0.02	0.01
04	Group 4 Engine (1)	PM	0.6	0.1
		HAPs	0.02	0.01
05	Group 5 Engine (1)	PM	0.3	0.1
		HAPs	0.03	0.01

3. Visible emissions may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9.

SN	Limit	Regulatory Citation
01, 02, 03, 04, 05	20%	[8 CAR § 41-403 and 40 C.F.R. § 52 Subpart E]

4. Annual observations of the opacity from each engine in this section shall be conducted by a person trained but not necessarily certified in EPA Reference Method 9. If visible emissions in excess of the permitted levels are detected, the permittee shall immediately take action to identify the cause of the visible emissions in excess of the permit limit, implement corrective action, and document that visible emissions did not appear to be in excess of the permitted opacity following the corrective action/perform an EPA Reference Method 9 test to verify emissions are not in excess of the permitted level. The permittee shall maintain records which contain the following items in order to demonstrate compliance with this specific condition. These records shall be updated weekly, kept on site, and made available to Division of Environmental Quality personnel upon request.
 - a. The date and time of the observation.
 - b. If visible emissions which appeared to be above the permitted limit were detected.
 - c. If visible emissions which appeared to be above the permitted limit were detected, the cause of the exceedance of the opacity limit, the corrective action taken, and if the visible emissions appeared to be below the permitted limit after the corrective action was taken.
 - d. The name of the person conducting the opacity observations.
5. The permittee shall not operate the emergency engines SN-02, 03, 04, and 05 in excess of 100 hours each (emergency and non-emergency) per consecutive 12-month period in order to demonstrate compliance with the annual emission rate limits. [8 CAR § 41-605, Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311, and 40 C.F.R. § 70.6]
6. The permittee shall maintain monthly records to demonstrate compliance with Specific Condition #5. The permittee shall update these records by the fifteenth day of the month following the month to which the records pertain. The 12-month totals and each individual month's data shall be maintained on-site, made available to Division of Environmental Quality personnel upon request, and submitted in accordance with General Provision #7. [8 CAR § 41-605 and 40 C.F.R. § 52 Subpart E]
7. The permittee shall not emit from the emergency engines in SN-01 emissions in excess of 242 tons of NO_x per consecutive 12-month period. This emission rate shall be calculated using the lb/hr limit of the source times the hours operated, and then converted to tons. [8 CAR § 41-605, 8 CAR § 41-305(b), Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311, and 40 C.F.R. § 70.6]
8. The permittee shall maintain monthly records to demonstrate compliance with Specific Condition #7. The permittee shall update these records by the fifteenth day of the month

following the month to which the records pertain. The consecutive 12-month and each individual month's data shall be maintained on-site, made available to Division of Environmental Quality personnel upon request, and submitted in accordance with General Provision #7. [8 CAR § 41-605 and 40 C.F.R. § 52 Subpart E]

9. The permittee shall install engines of the size and type specified in their application for an air permit. The permittee shall maintain records of the size of the engines, all engine certifications, and a copy of their confidential permit application. These records shall be kept on site and made available to Division personnel upon request. [8 CAR § 41-605 and 40 C.F.R. § 52 Subpart E]
10. All engines in this section shall be fired with diesel fuel, HVO, or an HVO-diesel fuel blend that meets the requirements of 40 CFR §1090.305. [8 CAR § 41-605 and 40 C.F.R. § 52 Subpart E]

40 C.F.R. § 63 Subpart ZZZZ Condition for Emergency Compression Ignition Engines
 (Constructed On or After 6-12-2006) at an Area Source

11. SN-01, 02, 03, 04, and 05 are subject to 40 C.F.R. § 63 Subpart ZZZZ. The permittee shall meet the requirements of 40 C.F.R. § 63 Subpart ZZZZ by meeting the requirements of 40 C.F.R. § 60 Subpart IIII. [8 CAR § 41-204 and 40 C.F.R. § 63.6590(c)(1)]

40 C.F.R. § 60 Subpart IIII Conditions for Fire Pump Compression Ignition Engines
 < 30 L/Cylinder (Constructed After 7-11-2005 and Manufactured After 7-1-2006)

12. The engines in SN-03 are subject to 40 C.F.R. § 60 Subpart IIII. The permittee shall comply with all applicable provisions of 40 C.F.R. § 60 Subpart IIII which includes, but is not limited to, Specific Conditions #12 through #29. [8 CAR § 41-204 and 40 C.F.R. § 60 Subpart IIII]
13. The permittee must comply with the emission standards in the table below for all pollutants. [8 CAR § 41-204 and 40 C.F.R. § 60.4205(c) and Table 4 to 40 C.F.R. § 60 Subpart IIII]

Maximum engine power	Model year(s)	NMHC + NO _x g/KW-hr (g/HP-hr)	CO g/KW-hr (g/HP-hr)	PM g/KW-hr (g/HP-hr)
KW<8 (HP<11)	2010 and earlier	10.5 (7.8)	8.0 (6.0)	1.0 (0.75)
	2011 +	7.5 (5.6)		0.40 (0.30)
8≤KW<19 (11≤HP<25)	2010 and earlier	9.5 (7.1)	6.6 (4.9)	0.80 (0.60)
	2011 +	7.5 (5.6)		0.40 (0.30)
19≤KW<37 (25≤HP<50)	2010 and earlier	9.5 (7.1)	5.5 (4.1)	0.80 (0.60)
	2011 +	7.5 (5.6)		0.30 (0.22)

Maximum engine power	Model year(s)	NMHC + NO_x g/KW-hr (g/HP-hr)	CO g/KW-hr (g/HP-hr)	PM g/KW-hr (g/HP-hr)
37≤KW<56 (50≤HP<75)	2010 and earlier	10.5 (7.8)	5.0 (3.7)	0.80 (0.60)
	2011 + ¹	4.7 (3.5)		0.40 (0.30)
56≤KW<75 (75≤HP<100)	2010 and earlier	10.5 (7.8)	5.0 (3.7)	0.80 (0.60)
	2011 + ¹	4.7 (3.5)		0.40 (0.30)
75≤KW<130 (100≤HP<175)	2009 and earlier	10.5 (7.8)	5.0 (3.7)	0.80 (0.60)
	2010 + ²	4.0 (3.0)		0.30 (0.22)
130≤KW<225 (175≤HP<300)	2008 and earlier	10.5 (7.8)	3.5 (2.6)	0.54 (0.40)
	2009 + ³	4.0 (3.0)		0.20 (0.15)
225≤KW<450 (300≤HP<600)	2008 and earlier	10.5 (7.8)	3.5 (2.6)	0.54 (0.40)
	2009 + ³	4.0 (3.0)		0.20 (0.15)
450≤KW≤560 (600≤HP≤750)	2008 and earlier	10.5 (7.8)	3.5 (2.6)	0.54 (0.40)
	2009 +	4.0 (3.0)		0.20 (0.15)
KW>560 (HP>750)	2007 and earlier	10.5 (7.8)	3.5 (2.6)	0.54 (0.40)
	2008 +	6.4 (4.8)		0.20 (0.15)

¹For model years 2011-2013, manufacturers, owners and operators of fire pump stationary CI ICE in this engine power category with a rated speed of greater than 2,650 revolutions per minute (rpm) may comply with the emission limitations for 2010 model year engines.

²For model years 2010-2012, manufacturers, owners and operators of fire pump stationary CI ICE in this engine power category with a rated speed of greater than 2,650 rpm may comply with the emission limitations for 2009 model year engines.

³In model years 2009-2011, manufacturers of fire pump stationary CI ICE in this engine power category with a rated speed of greater than 2,650 rpm may comply with the emission limitations for 2008 model year engines.

14. The permittee must operate and maintain stationary CI ICE that achieve the emission standards as required in § 60.4205 over the entire life of the engine. [8 CAR § 41-204 and 40 C.F.R. § 60.4206]
15. The permittee must use diesel fuel that meets the requirements of 40 C.F.R. § 80.510(b) for nonroad diesel fuel. [8 CAR § 41-204 and 40 C.F.R. § 60.4207(b)]
16. Stationary CI ICE that have a national security exemption under § 60.4200(d) are also exempt from the fuel requirements in § 60.4207. [8 CAR § 41-204 and 40 C.F.R. § 60.4207(e)]

17. In addition to the requirements specified in §§ 60.4201, 60.4202, 60.4204, and 60.4205, it is prohibited to import stationary CI ICE with a displacement of less than 30 liters per cylinder that do not meet the applicable requirements specified in § 60.4208(a) through (g) after the dates specified in § 60.4208(a) through (g). [8 CAR § 41-204 and 40 C.F.R. § 60.4208(h)]
18. The requirements of this section do not apply to owners or operators of stationary CI ICE that have been modified, reconstructed, and do not apply to engines that were removed from one existing location and reinstalled at a new location. [8 CAR § 41-204 and 40 C.F.R. § 60.4208(i)]
19. The permittee must install a non-resettable hour meter prior to startup of the engine. [8 CAR § 41-204 and 40 C.F.R. § 60.4209(a)]
20. If you are an owner or operator of a stationary CI internal combustion engine equipped with a diesel particulate filter to comply with the emission standards in § 60.4204, the diesel particulate filter must be installed with a backpressure monitor that notifies the owner or operator when the high backpressure limit of the engine is approached. [8 CAR § 41-204 and 40 C.F.R. § 60.4209(b)]
21. If you are an owner or operator and must comply with the emission standards specified in 40 C.F.R. § 60 Subpart IIII, you must do all of the following, except as permitted under § 60.4211(g): [8 CAR § 41-204 and 40 C.F.R. § 60.4211(a)]
 - a. Operate and maintain the stationary CI internal combustion engine and control device according to the manufacturer's emission-related written instructions; [8 CAR § 41-204 and 40 C.F.R. § 60.4211(a)(1)]
 - b. Change only those emission-related settings that are permitted by the manufacturer; and [8 CAR § 41-204 and 40 C.F.R. § 60.4211(a)(2)]
 - c. Meet the requirements of 40 C.F.R. §§ 89, 94 and/or 1068, as they apply to you. [8 CAR § 41-204 and 40 C.F.R. § 60.4211(a)(3)]
22. If you are an owner or operator of a CI fire pump engine that is manufactured prior to the model years in table 3 to 40 C.F.R. § 60 Subpart IIII and must comply with the emission standards specified in § 60.4205(c), you must demonstrate compliance according to one of the methods specified in § 60.4211(b)(1) through (5). [8 CAR § 41-204 and 40 C.F.R. § 60.4211(b)]
 - a. Purchasing an engine certified according to 40 C.F.R. § 89 or 40 C.F.R. § 94, as applicable, for the same model year and maximum engine power. The engine must be installed and configured according to the manufacturer's specifications. [8 CAR § 41-204 and 40 C.F.R. § 60.4211(b)(1)]
 - b. Keeping records of performance test results for each pollutant for a test conducted on a similar engine. The test must have been conducted using the same methods specified in 40 C.F.R. § 60 Subpart IIII and these methods must have been followed correctly. [8 CAR § 41-204 and 40 C.F.R. § 60.4211(b)(2)]

- c. Keeping records of engine manufacturer data indicating compliance with the standards. [8 CAR § 41-204 and 40 C.F.R. § 60.4211(b)(3)]
 - d. Keeping records of control device vendor data indicating compliance with the standards. [8 CAR § 41-204 and 40 C.F.R. § 60.4211(b)(4)]
 - e. Conducting an initial performance test to demonstrate compliance with the emission standards according to the requirements specified in § 60.4212, as applicable. [8 CAR § 41-204 and 40 C.F.R. § 60.4211(b)(5)]
23. If you are an owner or operator of a CI fire pump engine the is manufactured during or after the model year that applies to your fire pump engine rating in table 3 to 40 C.F.R. § 60 Subpart IIII and must comply with the emission standards specified in § 60.4205(c), the permittee must demonstrate compliance by purchasing an engine certified to the emission standards in § 60.4205(c) for the same model year and NFPA nameplate engine power. The engine must be installed and configured according to the manufacturer's emission-related specifications, except as permitted in § 60.4211(g). [8 CAR § 41-204 and 40 C.F.R. § 60.4211(c)]
24. The permittee must operate the emergency stationary ICE according to the requirements in § 60.4211(f)(1) through (3). In order for the engine to be considered an emergency stationary ICE under 40 C.F.R. § 60 Subpart IIII, any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per year, as described in § 60.4211(f)(1) through (3), is prohibited. If you do not operate the engine according to the requirements in § 60.4211(f)(1) through (3), the engine will not be considered an emergency engine under 40 C.F.R. § 60 Subpart IIII and must meet all requirements for non-emergency engines. [8 CAR § 41-204 and 40 C.F.R. § 60.4211(f)]
- a. There is no time limit on the use of emergency stationary ICE in emergency situations. [8 CAR § 41-204 and 40 C.F.R. § 60.4211(f)(1)]
 - b. The permittee may operate the emergency stationary ICE for any combination of the purposes specified in § 60.4211(f)(2)(i) for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by § 60.4211(f)(3) counts as part of the 100 hours per calendar year allowed by § 60.4211(f)(2). [8 CAR § 41-204 and 40 C.F.R. § 60.4211(f)(2)]
 - i. Emergency stationary ICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency ICE beyond 100 hours per calendar year. [8 CAR § 41-204 and 40 C.F.R. § 60.4211(f)(2)(i)]

- c. Emergency stationary ICE may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing provided in § 60.4211(f)(2). Except as provided in § 60.4211(f)(3)(i), the 50 hours per calendar year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity. [8 CAR § 41-204 and 40 C.F.R. § 60.4211(f)(3)]
 - i. The 50 hours per year for non-emergency situations can be used to supply power as part of a financial arrangement with another entity if all of the following conditions are met: [8 CAR § 41-204 and 40 C.F.R. § 60.4211(f)(3)(i)]
 - 1. The engine is dispatched by the local balancing authority or local transmission and distribution system operator; [8 CAR § 41-204 and 40 C.F.R. § 60.4211(f)(3)(i)(A)]
 - 2. The dispatch is intended to mitigate local transmission and/or distribution limitations so as to avert potential voltage collapse or line overloads that could lead to the interruption of power supply in a local area or region. [8 CAR § 41-204 and 40 C.F.R. § 60.4211(f)(3)(i)(B)]
 - 3. The dispatch follows reliability, emergency operation or similar protocols that follow specific NERC, regional, state, public utility commission or local standards or guidelines. [8 CAR § 41-204 and 40 C.F.R. § 60.4211(f)(3)(i)(C)]
 - 4. The power is provided only to the facility itself or to support the local transmission and distribution system. [8 CAR § 41-204 and 40 C.F.R. § 60.4211(f)(3)(i)(D)]
 - 5. The owner or operator identifies and records the entity that dispatches the engine and the specific NERC, regional, state, public utility commission or local standards or guidelines that are being followed for dispatching the engine. The local balancing authority or local transmission and distribution system operator may keep these records on behalf of the engine owner or operator. [8 CAR § 41-204 and 40 C.F.R. § 60.4211(f)(3)(i)(E)]
25. If you do not install, configure, operate, and maintain your engine and control device according to the manufacturer's emission-related written instructions, or you change emission-related settings in a way that is not permitted by the manufacturer, you must demonstrate compliance as follows: [8 CAR § 41-204 and 40 C.F.R. § 60.4211(g)]
- a. If you are an owner or operator of a stationary CI internal combustion engine with maximum engine power less than 100 HP, you must keep a maintenance plan and records of conducted maintenance to demonstrate compliance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions. In addition, if you

do not install and configure the engine and control device according to the manufacturer's emission-related written instructions, or you change the emission-related settings in a way that is not permitted by the manufacturer, you must conduct an initial performance test to demonstrate compliance with the applicable emission standards within 1 year of such action. [8 CAR § 41-204 and 40 C.F.R. § 60.4211(g)(1)]

- b. If you are an owner or operator of a stationary CI internal combustion engine greater than or equal to 100 HP and less than or equal to 500 HP, you must keep a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions. In addition, you must conduct an initial performance test to demonstrate compliance with the applicable emission standards within 1 year of startup, or within 1 year after an engine and control device is no longer installed, configured, operated, and maintained in accordance with the manufacturer's emission-related written instructions, or within 1 year after you change emission-related settings in a way that is not permitted by the manufacturer. [8 CAR § 41-204 and 40 C.F.R. § 60.4211(g)(2)]
 - c. If you are an owner or operator of a stationary CI internal combustion engine greater than 500 HP, you must keep a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions. In addition, you must conduct an initial performance test to demonstrate compliance with the applicable emission standards within 1 year of startup, or within 1 year after an engine and control device is no longer installed, configured, operated, and maintained in accordance with the manufacturer's emission-related written instructions, or within 1 year after you change emission-related settings in a way that is not permitted by the manufacturer. You must conduct subsequent performance testing every 8,760 hours of engine operation or 3 years, whichever comes first, thereafter to demonstrate compliance with the applicable emission standards. [8 CAR § 41-204 and 40 C.F.R. § 60.4211(g)(3)]
26. Owners and operators of stationary CI ICE with a displacement of less than 30 liters per cylinder who conduct performance tests pursuant to 40 C.F.R. § 60 Subpart IIII must do so according to § 60.4212(a) through (e). [8 CAR § 41-204 and 40 C.F.R. § 60.4212]
27. The permittee is not required to submit an initial notification. Starting with the model years in the table below, if the emergency engine does not meet the standards applicable to non-emergency engines in the applicable model year, the owner or operator must keep records of the operation of the engine in emergency and non-emergency service that are recorded through the non-resettable hour meter. The owner must record the time of operation of the engine and the reason the engine was in operation during that time. [8 CAR § 41-204 and 40 C.F.R. § 60.4214(b) and Table 5 to 40 C.F.R. § 60 Subpart IIII]

Engine power	Starting model year
19≤KW<56 (25≤HP<75)	2013

Engine power	Starting model year
56≤KW<130 (75≤HP<175)	2012
KW≥130 (HP≥175)	2011

28. If the stationary CI internal combustion engine is equipped with a diesel particulate filter, the owner or operator must keep records of any corrective action taken after the backpressure monitor has notified the owner or operator that the high backpressure limit of the engine is approached. [8 CAR § 41-204 and 40 C.F.R. § 60.4214(c)]
29. Table 8 to 40 C.F.R. § 60 Subpart IIII shows which parts of the General Provisions in §§ 60.1 through 60.19 apply to you. [8 CAR § 41-204 and 40 C.F.R. § 60.4218]
- 40 C.F.R. § 60 Subpart IIII Conditions for Non-Fire Pump Emergency Compression Ignition Engines < 30 L/Cylinder (2007 Model Year and Later Constructed After 7-11-2005 and Manufactured After 4-1-2006)
30. The engines comprising SN-01, 02, 04, and 05 are subject to 40 C.F.R. § 60 Subpart IIII. The permittee shall comply with all applicable provisions of 40 C.F.R. § 60 Subpart IIII which includes, but is not limited to, Specific Conditions #31 through #51. [8 CAR § 41-204 and 40 C.F.R. § 60 Subpart IIII]
31. The provisions of 40 C.F.R. § 60 Subpart IIII are applicable to owners and operators of stationary compression ignition (CI) internal combustion engines (ICE) that commence construction after July 11, 2005, where the stationary CI ICE are manufactured after April 1, 2006, and are not fire pump engines. For the purposes of 40 C.F.R. § 60 Subpart IIII, the date that construction commences is the date the engine is ordered by the owner or operator. [8 CAR § 41-204 and 40 C.F.R. § 60.4200(a)(2)(i)]
32. Owners and operators of 2007 model year and later emergency stationary CI ICE with a displacement of less than 30 liters per cylinder that are not fire pump engines must comply with the emission standards for new nonroad CI engines in § 60.4202, for all pollutants, for the same model year and maximum engine power for their 2007 model year and later emergency stationary CI ICE. [8 CAR § 41-204 and 40 C.F.R. § 60.4205(b)]
33. The permittee must operate and maintain stationary CI ICE that achieve the emission standards as required in § 60.4205 over the entire life of the engine. [8 CAR § 41-204 and 40 C.F.R. § 60.4206]
34. Beginning October 1, 2007, owners and operators of stationary CI ICE subject to 40 C.F.R. § 60 Subpart IIII that use diesel fuel must use diesel fuel that meets the requirements of 40 C.F.R. § 80.510(a). [8 CAR § 41-204 and 40 C.F.R. § 60.4207(a)]
35. Beginning October 1, 2010, owners and operators of stationary CI ICE subject to 40 C.F.R. § 60 Subpart IIII with a displacement of less than 30 liters per cylinder that use

- diesel fuel must use diesel fuel that meets the requirements of 40 C.F.R. § 80.510(b) for nonroad diesel fuel, except that any existing diesel fuel purchased (or otherwise obtained) prior to October 1, 2010, may be used until depleted. [8 CAR § 41-204 and 40 C.F.R. § 60.4207(b)]
36. Stationary CI ICE that have a national security exemption under § 60.4200(d) are also exempt from the fuel requirements in § 60.4207. [8 CAR § 41-204 and 40 C.F.R. § 60.4207(e)]
 37. After December 31, 2008, owners and operators may not install stationary CI ICE (excluding fire pump engines) that do not meet the applicable requirements for 2007 model year engines. [8 CAR § 41-204 and 40 C.F.R. § 60.4208(a)]
 38. After December 31, 2009, owners and operators may not install stationary CI ICE with a maximum engine power of less than 19 KW (25 HP) (excluding fire pump engines) that do not meet the applicable requirements for 2008 model year engines. [8 CAR § 41-204 and 40 C.F.R. § 60.4208(b)]
 39. In addition to the requirements specified in §§ 60.4201, 60.4202, 60.4204, and 60.4205, it is prohibited to import stationary CI ICE with a displacement of less than 30 liters per cylinder that do not meet the applicable requirements specified in § 60.4208(a) through (g) after the dates specified in § 60.4208(a) through (g). [8 CAR § 41-204 and 40 C.F.R. § 60.4208(h)]
 40. The requirements of § 60.4208 do not apply to owners or operators of stationary CI ICE that have been modified, reconstructed, and do not apply to engines that were removed from one existing location and reinstalled at a new location. [8 CAR § 41-204 and 40 C.F.R. § 60.4208(i)]
 41. If you are an owner or operator of an emergency stationary CI internal combustion engine that does not meet the standards applicable to non-emergency engines, you must install a non-resettable hour meter prior to startup of the engine. [8 CAR § 41-204 and 40 C.F.R. § 60.4209(a)]
 42. If you are an owner or operator of a stationary CI internal combustion engine equipped with a diesel particulate filter to comply with the emission standards in § 60.4204, the diesel particulate filter must be installed with a backpressure monitor that notifies the owner or operator when the high backpressure limit of the engine is approached. [8 CAR § 41-204 and 40 C.F.R. § 60.4209(b)]
 43. If you are an owner or operator and must comply with the emission standards specified in 40 C.F.R. § 60 Subpart IIII, you must do all of the following, except as permitted under § 60.4211(g): [8 CAR § 41-204 and 40 C.F.R. § 60.4211(a)]

- a. Operate and maintain the stationary CI internal combustion engine and control device according to the manufacturer's emission-related written instructions; [8 CAR § 41-204 and 40 C.F.R. § 60.4211(a)(1)]
 - b. Change only those emission-related settings that are permitted by the manufacturer; and [8 CAR § 41-204 and 40 C.F.R. § 60.4211(a)(2)]
 - c. Meet the requirements of 40 C.F.R. §§ 89, 94 and/or 1068, as they apply to you. [8 CAR § 41-204 and 40 C.F.R. § 60.4211(a)(3)]
44. If you are an owner or operator of a 2007 model year and later stationary CI internal combustion engine and must comply with the emission standards specified in § 60.4204(b) or § 60.4205(b), or if you are an owner or operator of a CI fire pump engine that is manufactured during or after the model year that applies to your fire pump engine power rating in table 3 to 40 C.F.R. § 60 Subpart IIII and must comply with the emission standards specified in § 60.4205(c), you must comply by purchasing an engine certified to the emission standards in § 60.4204(b), or § 60.4205(b) or (c), as applicable, for the same model year and maximum (or in the case of fire pumps, NFPA nameplate) engine power. The engine must be installed and configured according to the manufacturer's emission-related specifications, except as permitted in § 60.4211(g). [8 CAR § 41-204 and 40 C.F.R. § 60.4211(c)]
45. If you own or operate an emergency stationary ICE, you must operate the emergency stationary ICE according to the requirements in § 60.4211(f)(1) through (3). In order for the engine to be considered an emergency stationary ICE under 40 C.F.R. § 60 Subpart IIII, any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per year, as described in § 60.4211(f)(1) through (3), is prohibited. If you do not operate the engine according to the requirements in § 60.4211(f)(1) through (3), the engine will not be considered an emergency engine under 40 C.F.R. § 60 Subpart IIII and must meet all requirements for non-emergency engines. [8 CAR § 41-204 and 40 C.F.R. § 60.4211(f)]
 - a. There is no time limit on the use of emergency stationary ICE in emergency situations. [8 CAR § 41-204 and 40 C.F.R. § 60.4211(f)(1)]
 - b. You may operate your emergency stationary ICE for any combination of the purposes specified in § 60.4211(f)(2)(i) for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by § 60.4211(f)(3) counts as part of the 100 hours per calendar year allowed by § 60.4211 (f)(2). [8 CAR § 41-204 and 40 C.F.R. § 60.4211(f)(2)]
 - i. Emergency stationary ICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require

- maintenance and testing of emergency ICE beyond 100 hours per calendar year. [8 CAR § 41-204 and 40 C.F.R. § 60.4211(f)(2)(i)]
- c. Emergency stationary ICE may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing provided in § 60.4211(f)(2). Except as provided in § 60.4211(f)(3)(i), the 50 hours per calendar year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity. [8 CAR § 41-204 and 40 C.F.R. § 60.4211(f)(3)]
 - i. The 50 hours per year for non-emergency situations can be used to supply power as part of a financial arrangement with another entity if all of the following conditions are met: [8 CAR § 41-204 and 40 C.F.R. § 60.4211(f)(3)(i)]
 - 1. The engine is dispatched by the local balancing authority or local transmission and distribution system operator; [8 CAR § 41-204 and 40 C.F.R. § 60.4211(f)(3)(i)(A)]
 - 2. The dispatch is intended to mitigate local transmission and/or distribution limitations so as to avert potential voltage collapse or line overloads that could lead to the interruption of power supply in a local area or region. [8 CAR § 41-204 and 40 C.F.R. § 60.4211(f)(3)(i)(B)]
 - 3. The dispatch follows reliability, emergency operation or similar protocols that follow specific NERC, regional, state, public utility commission or local standards or guidelines. [8 CAR § 41-204 and 40 C.F.R. § 60.4211(f)(3)(i)(C)]
 - 4. The power is provided only to the facility itself or to support the local transmission and distribution system. [8 CAR § 41-204 and 40 C.F.R. § 60.4211(f)(3)(i)(D)]
 - 5. The owner or operator identifies and records the entity that dispatches the engine and the specific NERC, regional, state, public utility commission or local standards or guidelines that are being followed for dispatching the engine. The local balancing authority or local transmission and distribution system operator may keep these records on behalf of the engine owner or operator. [8 CAR § 41-204 and 40 C.F.R. § 60.4211(f)(3)(i)(E)]
46. If you do not install, configure, operate, and maintain your engine and control device according to the manufacturer's emission-related written instructions, or you change emission-related settings in a way that is not permitted by the manufacturer, you must demonstrate compliance as follows: [8 CAR § 41-204 and 40 C.F.R. § 60.4211(g)]
- a. If you are an owner or operator of a stationary CI internal combustion engine with maximum engine power less than 100 HP, you must keep a maintenance plan and records of conducted maintenance to demonstrate compliance and must, to the

extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions. In addition, if you do not install and configure the engine and control device according to the manufacturer's emission-related written instructions, or you change the emission-related settings in a way that is not permitted by the manufacturer, you must conduct an initial performance test to demonstrate compliance with the applicable emission standards within 1 year of such action. [8 CAR § 41-204 and 40 C.F.R. § 60.4211(g)(1)]

- b. If you are an owner or operator of a stationary CI internal combustion engine greater than or equal to 100 HP and less than or equal to 500 HP, you must keep a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions. In addition, you must conduct an initial performance test to demonstrate compliance with the applicable emission standards within 1 year of startup, or within 1 year after an engine and control device is no longer installed, configured, operated, and maintained in accordance with the manufacturer's emission-related written instructions, or within 1 year after you change emission-related settings in a way that is not permitted by the manufacturer. [8 CAR § 41-204 and 40 C.F.R. § 60.4211(g)(2)]
 - c. If you are an owner or operator of a stationary CI internal combustion engine greater than 500 HP, you must keep a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions. In addition, you must conduct an initial performance test to demonstrate compliance with the applicable emission standards within 1 year of startup, or within 1 year after an engine and control device is no longer installed, configured, operated, and maintained in accordance with the manufacturer's emission-related written instructions, or within 1 year after you change emission-related settings in a way that is not permitted by the manufacturer. You must conduct subsequent performance testing every 8,760 hours of engine operation or 3 years, whichever comes first, thereafter to demonstrate compliance with the applicable emission standards. [8 CAR § 41-204 and 40 C.F.R. § 60.4211(g)(3)]
47. The requirements for operators and prohibited acts specified in 40 C.F.R. § 1039.665 apply to owners or operators of stationary CI ICE equipped with AECDs for qualified emergency situations as allowed by 40 C.F.R. § 1039.665. [8 CAR § 41-204 and 40 C.F.R. § 60.4211(h)]
48. Owners and operators of stationary CI ICE with a displacement of less than 30 liters per cylinder who conduct performance tests pursuant to 40 C.F.R. § 60 Subpart IIII must do so according to § 60.4212(a) through (e). [8 CAR § 41-204 and 40 C.F.R. § 60.4212]
49. The permittee is not required to submit an initial notification. Starting with the model years in the table below, if the emergency engine does not meet the standards applicable to non-emergency engines in the applicable model year, the owner or operator must keep

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records of the operation of the engine in emergency and non-emergency service that are recorded through the non-resettable hour meter. The owner must record the time of operation of the engine and the reason the engine was in operation during that time. [8 CAR § 41-204 and 40 C.F.R. § 60.4214(b) and Table 5 to 40 C.F.R. § 60 Subpart IIII]

Engine power	Starting model year
19≤KW<56 (25≤HP<75)	2013
56≤KW<130 (75≤HP<175)	2012
KW≥130 (HP≥175)	2011

50. If the stationary CI internal combustion engine is equipped with a diesel particulate filter, the owner or operator must keep records of any corrective action taken after the backpressure monitor has notified the owner or operator that the high backpressure limit of the engine is approached. [8 CAR § 41-204 and 40 C.F.R. § 60.4214(c)]
51. Table 8 to 40 C.F.R. § 60 Subpart IIII shows which parts of the General Provisions in §§ 60.1 through 60.19 apply to you. [8 CAR § 41-204 and 40 C.F.R. § 60.4218]

SN-06 and 07
Tanks

Source Description

SN-06 are the fuel tanks for the engines comprising SN-01. They will store diesel fuel or HVO.

SN-07 are the fuel tanks for SN-02, 03, 04, and 05. They will store diesel fuel or HVO.

Specific Conditions

52. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by compliance with Specific Conditions 5 and 7. [8 CAR § 41-401 et seq. and 40 C.F.R. § 52 Subpart E]

SN	Description	Pollutant	lb/hr	tpy
06	Group 1 Tanks	VOC	0.1	0.2
07	Auxiliary Tanks	VOC	0.1	0.1

53. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by compliance with Specific Conditions 5 and 7. [8 CAR § 40-701 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

SN	Description	Pollutant	lb/hr	tpy
06	Group 1 Tanks	HAPs	0.01	0.01
07	Auxiliary Tanks	HAPs	0.01	0.01

SN-08
Cooling Towers

Source Description

SN-08 are the cooling towers. Each cooling tower is rated at 6,000 gallons per minute. They include equipment ID B1CT1 through 12, B2CT1 through 12, B3CT1 though 12, B4CT1 though 12, and B5CT1 through 12.

Specific Conditions

54. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by compliance with Specific Condition 56. [8 CAR § 41-401 et seq. and 40 C.F.R. § 52 Subpart E]

SN	Description	Pollutant	lb/hr	tpy
08	Cooling Towers (60) Emissions are for all 60	PM ₁₀	1.9	8.3

55. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by compliance with Specific Condition 56. [8 CAR § 40-701 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

SN	Description	Pollutant	lb/hr	tpy
08	Cooling Towers (60) Emissions are for EACH	PM	2.8	11.9

56. The permittee shall ensure the maximum TDS does not exceed 1500 ppm in water provided to SN-08. [8 CAR § 41-605, Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311, and 40 C.F.R. § 70.6]
57. The permittee shall test the TDS of each of the cooling towers initially and every 6 months thereafter. If multiple cooling towers share a common water system, the permittee may test collective system in lieu of each individual tower. This testing shall be conducted in accordance with Plantwide Condition 3 with a method approved by the Division before the first test is performed. The permittee shall keep records of the TDS test. These records shall be kept on site, made available to Division personnel upon request, and kept in accordance with General Provision 7. [8 CAR pt. 418 CAR § 41-605, Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311, and 40 C.F.R. § 70.6]

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SN-09
Roads

Source Description

SN-09 accounts for emissions on paved roadways from the engine fuel deliveries.

Specific Conditions

58. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by compliance with Plantwide Condition 5. [8 CAR § 41-401 et seq. and 40 C.F.R. § 52 Subpart E]

SN	Description	Pollutant	lb/hr	tpy
09	Roads	PM ₁₀	0.1	0.1

59. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by compliance with Plantwide 5. [8 CAR § 40-701 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

SN	Description	Pollutant	lb/hr	tpy
09	Roads	PM	0.1	0.3

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SECTION V: COMPLIANCE PLAN AND SCHEDULE

Groot LLC will continue to operate in compliance with those identified regulatory provisions. The facility will examine and analyze future rules and regulations that may apply and determine their applicability with any necessary action taken on a timely basis.

SECTION VI: PLANTWIDE CONDITIONS

1. The permittee shall notify the Director in writing within thirty (30) days after commencing construction, completing construction, first placing the equipment and/or facility in operation, and reaching the equipment and/or facility target production rate. [8 CAR § 41-604, 40 C.F.R. § 52 Subpart E, and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
2. If the permittee fails to start construction within eighteen months or suspends construction for eighteen months or more, the Director may cancel all or part of this permit. [8 CAR § 41-310(b) and 40 C.F.R. § 52 Subpart E]
3. The permittee must test any equipment scheduled for testing, unless otherwise stated in the Specific Conditions of this permit or by any federally regulated requirements, within the following time frames: (1) new equipment or newly modified equipment within sixty (60) days of achieving the maximum production rate, but no later than 180 days after initial start up of the permitted source or (2) operating equipment according to the time frames set forth by the Division of Environmental Quality or within 180 days of permit issuance if no date is specified. The permittee must notify the Division of Environmental Quality of the scheduled date of compliance testing at least fifteen (15) business days in advance of such test. The permittee shall submit the compliance test results to the Division of Environmental Quality within sixty (60) calendar days after completing the testing. [8 CAR § 41-602 and/or 8 CAR § 40-902 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
4. The permittee must provide:
 - a. Sampling ports adequate for applicable test methods;
 - b. Safe sampling platforms;
 - c. Safe access to sampling platforms; and
 - d. Utilities for sampling and testing equipment.

[8 CAR § 41-602 and/or 8 CAR § 40-902 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
5. The permittee must operate the equipment, control apparatus and emission monitoring equipment within the design limitations. The permittee shall maintain the equipment in good condition at all times. [8 CAR § 41-203 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
6. This permit subsumes and incorporates all previously issued air permits for this facility. [8 CAR pt. 42 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

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7. Unless otherwise specified in the permit, approval to construct any new major stationary source or a major modification subject to 40 C.F.R. § 52.21 shall become invalid if construction is not commenced within 18 months after receipt of such approval, if construction is discontinued for a period of 18 months or more, or if construction is not completed within a reasonable time. The Division of Environmental Quality may extend the 18-month period upon a satisfactory showing that an extension is justified. [8 CAR § 41-801 et seq. and 40 C.F.R. § 52 Subpart E]

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SECTION VII: INSIGNIFICANT ACTIVITIES

The Division of Environmental Quality deems the following types of activities or emissions as insignificant on the basis of size, emission rate, production rate, or activity in accordance with Group A of the Insignificant Activities list found in 8 CAR pt. 40 and pt. 41 Appendix A. Group B insignificant activities may be listed but are not required to be listed in permits. Insignificant activity emission determinations rely upon the information submitted by the permittee in an application dated September 26, 2025. [8 CAR § 42-204 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

Description	Category
None	

SECTION VIII: GENERAL PROVISIONS

1. Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission 8 CAR pt. 40 or the Arkansas Water and Air Pollution Control Act (Ark. Code Ann. § 8-4-101 et seq.) as the sole origin of and authority for the terms or conditions are not required under the Clean Air Act or any of its applicable requirements, and are not federally enforceable under the Clean Air Act. Arkansas Pollution Control & Ecology Commission 8 CAR pt. 40 was adopted pursuant to the Arkansas Water and Air Pollution Control Act (Ark. Code Ann. § 8-4-101 et seq.). Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission 8 CAR pt. 40 or the Arkansas Water and Air Pollution Control Act (Ark. Code Ann. § 8-4-101 et seq.) as the origin of and authority for the terms or conditions are enforceable under this Arkansas statute. [40 C.F.R. § 70.6(b)(2)]
2. This permit shall be valid for a period of five (5) years beginning on the date this permit becomes effective and ending five (5) years later. [40 C.F.R. § 70.6(a)(2) and 8 CAR § 42-601(2)]
3. The permittee must submit a complete application for permit renewal at least six (6) months before permit expiration. Permit expiration terminates the permittee's right to operate unless the permittee submitted a complete renewal application at least six (6) months before permit expiration. If the permittee submits a complete application, the existing permit will remain in effect until the Division of Environmental Quality takes final action on the renewal application. The Division of Environmental Quality will not necessarily notify the permittee when the permit renewal application is due. [8 CAR § 42-306]
4. Where an applicable requirement of the Clean Air Act, as amended, 42 U.S.C. 7401, et seq. (Act) is more stringent than an applicable requirement of regulations promulgated under Title IV of the Act, the permit incorporates both provisions into the permit, and the Director or the Administrator can enforce both provisions. [40 C.F.R. § 70.6(a)(1)(ii) and 8 CAR § 42-601(1)(C)]
5. The permittee must maintain the following records of monitoring information as required by this permit.
 - a. The date, place as defined in this permit, and time of sampling or measurements;
 - b. The date(s) analyses performed;
 - c. The company or entity performing the analyses;
 - d. The analytical techniques or methods used;
 - e. The results of such analyses; and
 - f. The operating conditions existing at the time of sampling or measurement.

[40 C.F.R. § 70.6(a)(3)(ii)(A) and 8 CAR § 42-601(3)(C)]

6. The permittee must retain the records of all required monitoring data and support information for at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. [40 C.F.R. § 70.6(a)(3)(ii)(B) and 8 CAR § 42-601(3)(C)(ii)]
7. The permittee must submit reports of all required monitoring every six (6) months. If the permit establishes no other reporting period, the reporting period shall end on the last day of the month six months after the issuance of the initial Title V permit and every six months thereafter. The report is due on the first day of the second month after the end of the reporting period. The first report due after issuance of the initial Title V permit shall contain six months of data and each report thereafter shall contain 12 months of data. The report shall contain data for all monitoring requirements in effect during the reporting period. If a monitoring requirement is not in effect for the entire reporting period, only those months of data in which the monitoring requirement was in effect are required to be reported. The report must clearly identify all instances of deviations from permit requirements. A responsible official as defined in 8 CAR § 42-104 must certify all required reports. The permittee will send the reports electronically using <https://eportal.adeq.state.ar.us> or mail them to the address below:

Division of Environmental Quality
Office of Air Quality
ATTN: Compliance Inspector Supervisor
5301 Northshore Drive
North Little Rock, AR 72118-5317

[40 C.F.R. § 70.6(a)(3)(iii)(A) and 8 CAR § 42-601(3)(D)(i)]

8. The permittee shall report to the Division of Environmental Quality all deviations from permit requirements, including those attributable to upset conditions as defined in the permit.
 - a. For all upset conditions (as defined in 8 CAR § 41-501), the permittee will make an initial report to the Division of Environmental Quality by the next business day after the discovery of the occurrence. The initial report may be made by telephone and shall include:
 - i. The facility name and location;
 - ii. The process unit or emission source deviating from the permit limit;
 - iii. The permit limit, including the identification of pollutants, from which deviation occurs;
 - iv. The date and time the deviation started;

- v. The duration of the deviation;
- vi. The emissions during the deviation;
- vii. The probable cause of such deviations;
- viii. Any corrective actions or preventive measures taken or being taken to prevent such deviations in the future; and
- ix. The name of the person submitting the report.

The permittee shall make a full report in writing to the Division of Environmental Quality within five (5) business days of discovery of the occurrence. The report must include, in addition to the information required by the initial report, a schedule of actions taken or planned to eliminate future occurrences and/or to minimize the amount the permit's limits were exceeded and to reduce the length of time the limits were exceeded. The permittee may submit a full report in writing (by facsimile, overnight courier, or other means) by the next business day after discovery of the occurrence, and the report will serve as both the initial report and full report.

- b. For all deviations, the permittee shall report such events in semi-annual reporting and annual certifications required in this permit. This includes all upset conditions reported in 8a above. The semi-annual report must include all the information as required by the initial and full reports required in 8a.

[8 CAR § 41-501, 8 CAR § 41-502, 8 CAR § 42-601(3)(D)(ii), and 40 C.F.R. § 70.6(a)(3)(iii)(B)]

- 9. If any provision of the permit or the application thereof to any person or circumstance is held invalid, such invalidity will not affect other provisions or applications hereof which can be given effect without the invalid provision or application, and to this end, provisions of this Rule are declared to be separable and severable. [40 C.F.R. § 70.6(a)(5), Rule 8 CAR § 42-601(5), and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
- 10. The permittee must comply with all conditions of this Part 70 permit. Any permit noncompliance with applicable requirements as defined in 8 CAR pt. 42 constitutes a violation of the Clean Air Act, as amended, 42 U.S.C. § 7401, et seq. and is grounds for enforcement action; for permit termination, revocation and reissuance, for permit modification; or for denial of a permit renewal application. [40 C.F.R. § 70.6(a)(6)(i) and 8 CAR § 42-601(6)(A)]
- 11. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity to maintain compliance with the conditions of this permit. [40 C.F.R. § 70.6(a)(6)(ii) and 8 CAR § 42-601(6)(B)]
- 12. The Division of Environmental Quality may modify, revoke, reopen and reissue the permit or terminate the permit for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, termination, or of a notification of

- planned changes or anticipated noncompliance does not stay any permit condition. [40 C.F.R. § 70.6(a)(6)(iii) and 8 CAR § 42-601(6)(C)]
13. This permit does not convey any property rights of any sort, or any exclusive privilege. [40 C.F.R. § 70.6(a)(6)(iv) and 8 CAR § 42-601(6)(D)]
 14. The permittee must furnish to the Director, within the time specified by the Director, any information that the Director may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee must also furnish to the Director copies of records required by the permit. For information the permittee claims confidentiality, the Division of Environmental Quality may require the permittee to furnish such records directly to the Director along with a claim of confidentiality. [40 C.F.R. § 70.6(a)(6)(v) and 8 CAR § 42-601(6)(E)]
 15. The permittee must pay all permit fees in accordance with the procedures established in 8 CAR pt. 12. [40 C.F.R. § 70.6(a)(7) and 8 CAR § 42-601(7)]
 16. No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes provided for elsewhere in this permit. [40 C.F.R. § 70.6(a)(8) and 8 CAR § 42-601(8)]
 17. If the permit allows different operating scenarios, the permittee shall, contemporaneously with making a change from one operating scenario to another, record in a log at the permitted facility a record of the operational scenario. [40 C.F.R. § 70.6(a)(9)(i) and 8 CAR § 42-601(9)(B)(i)]
 18. The Administrator and citizens may enforce under the Act all terms and conditions in this permit, including any provisions designed to limit a source's potential to emit, unless the Division of Environmental Quality specifically designates terms and conditions of the permit as being federally unenforceable under the Act or under any of its applicable requirements. [40 C.F.R. § 70.6(b) and 8 CAR § 42-602(a) and (b)]
 19. Any document (including reports) required by this permit pursuant to 40 C.F.R. § 70 must contain a certification by a responsible official as defined in 8 CAR § 42-104. [40 C.F.R. § 70.6(c)(1) and 8 CAR § 42-603(1)]
 20. The permittee must allow an authorized representative of the Division of Environmental Quality, upon presentation of credentials, to perform the following: [40 C.F.R. § 70.6(c)(2) and 8 CAR § 42-603(2)]
 - a. Enter upon the permittee's premises where the permitted source is located or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

- b. Have access to and copy, at reasonable times, any records required under the conditions of this permit;
 - c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
 - d. As authorized by the Act, sample or monitor at reasonable times substances or parameters for assuring compliance with this permit or applicable requirements.
- 21. The permittee shall submit a compliance certification with the terms and conditions contained in the permit, including emission limitations, standards, or work practices. The permittee must submit the compliance certification annually. If the permit establishes no other reporting period, the reporting period shall end on the last day of the anniversary month of the initial Title V permit. The report is due on the first day of the second month after the end of the reporting period. The permittee must also submit the compliance certification to the Administrator as well as to the Division of Environmental Quality. All compliance certifications required by this permit must include the following: [40 C.F.R. § 70.6(c)(5) and 8 CAR § 42-603(5)(B)(iii)]
 - a. The identification of each term or condition of the permit that is the basis of the certification;
 - b. The compliance status;
 - c. Whether compliance was continuous or intermittent;
 - d. The method(s) used for determining the compliance status of the source, currently and over the reporting period established by the monitoring requirements of this permit; and
 - e. Such other facts as the Division of Environmental Quality may require elsewhere in this permit or by § 114(a)(3) and § 504(b) of the Act.
- 22. Nothing in this permit will alter or affect the following: [8 CAR § 42-604(c)]
 - a. The provisions of Section 303 of the Act (emergency orders), including the authority of the Administrator under that section;
 - b. The liability of the permittee for any violation of applicable requirements prior to or at the time of permit issuance;
 - c. The applicable requirements of the acid rain program, consistent with § 408(a) of the Act; or
 - d. The ability of EPA to obtain information from a source pursuant to § 114 of the Act.
- 23. This permit authorizes only those pollutant emitting activities addressed in this permit. [Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
- 24. The permittee may request in writing and at least 15 days in advance of the deadline, an extension to any testing, compliance or other dates in this permit. No such extensions are authorized until the permittee receives written Division of Environmental Quality

approval. The Division of Environmental Quality may grant such a request, at its discretion in the following circumstances:

- a. Such an extension does not violate a federal requirement;
- b. The permittee demonstrates the need for the extension; and
- c. The permittee documents that all reasonable measures have been taken to meet the current deadline and documents reasons it cannot be met.

[8 CAR § 40-214(a), 8 CAR § 41-316(a), 8 CAR § 42-913(a), Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311, and 40 C.F.R. § 52 Subpart E]

25. The permittee may request in writing and at least 30 days in advance, temporary emissions and/or testing that would otherwise exceed an emission rate, throughput requirement, or other limit in this permit. No such activities are authorized until the permittee receives written Division of Environmental Quality approval. Any such emissions shall be included in the facility's total emissions and reported as such. The Division of Environmental Quality may grant such a request, at its discretion under the following conditions:

- a. Such a request does not violate a federal requirement;
- b. Such a request is temporary in nature;
- c. Such a request will not result in a condition of air pollution;
- d. The request contains such information necessary for the Division of Environmental Quality to evaluate the request, including but not limited to, quantification of such emissions and the date/time such emission will occur;
- e. Such a request will result in increased emissions less than five tons of any individual criteria pollutant, one ton of any single HAP and 2.5 tons of total HAPs; and
- f. The permittee maintains records of the dates and results of such temporary emissions/testing.

[8 CAR § 40-214(b), 8 CAR § 41-316(b), 8 CAR § 42-913(b), Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311, and 40 C.F.R. § 52 Subpart E]

26. The permittee may request in writing and at least 30 days in advance, an alternative to the specified monitoring in this permit. No such alternatives are authorized until the permittee receives written Division of Environmental Quality approval. The Division of Environmental Quality may grant such a request, at its discretion under the following conditions:

- a. The request does not violate a federal requirement;
- b. The request provides an equivalent or greater degree of actual monitoring to the current requirements; and
- c. Any such request, if approved, is incorporated in the next permit modification application by the permittee.

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[8 CAR § 40-214(c), 8 CAR § 41-316(c), 8 CAR § 42-913(c), Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311, and 40 C.F.R. § 52 Subpart E]

27. Any credible evidence based on sampling, monitoring, and reporting may be used to determine violations of applicable emission limitations. [8 CAR § 40-901, 8 CAR § 41-601, Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311, and 40 C.F.R. § 52 Subpart E]