



MOJAVE DESERT AIR QUALITY MANAGEMENT DISTRICT

14306 Park Avenue Victorville, CA 92392-2310
760.245.1661 -- 800.635.4617 -- FAX 760.245.2022

AUTHORITY TO CONSTRUCT

B015517

If construction is not completed by the expiration date of this permit, it may be renewed for one additional year upon payment of applicable fees. Any additional extension will require the written approval of the Air Pollution Control Officer. This Authority to Construct may serve as a temporary Permit to Operate provided the APCO is given prior notice of intent to operate and the Permit to Operate is not specifically denied.

EXPIRES LAST DAY OF: APRIL 2027

OWNER OF OPERATOR (Co.#3001)

GTP Towers I, LLC
10 Presidential Way - HazMat Compliance
Woburn, MA 01801

EQUIPMENT LOCATION (Fac.#4680)

GTP - Ludlow (370464)
61400 Highway 66
Ludlow, CA 92338

Description:

LPG / PROPANE IC ENGINE, GENERATOR consisting of: A LPG-fired internal combustion engine, USEPA family TARWB06.5PNA, manufactured in 2025. Exhaust flow approximately 583 acfm, at 1300 degrees Fahrenheit through a 7.1 foot high by TBD inch diameter exhaust stack. Equipment is located at an elevation of 2607 feet.

One Arrow, LPG fired internal combustion engine Model No. KP6 and Serial No. TBD, Three-Way Catalyst (also NSCR), Air-To-Fuel Ratio Controller, Electronic Control Module, producing 95 bhp with 6 cylinders at 1800 rpm while consuming a maximum of 8.7 gal/hr. This equipment powers a Wildcat Power Gen Generator Model No. RO0060PLA*XP and Serial No. TBD, rated at 60 kW.

EMISSIONS RATES

Emission Type	Est. Max Load	Unit
CO	1.34	gm/bhp-hr
NOx	0.66	gm/bhp-hr
NOx+NMHC	1.87	gm/bhp-hr
PM10	0.21	gm/bhp-hr
PM2.5	0.21	gm/bhp-hr
SOx	0.015	gm/bhp-hr
VOC	1.23	gm/bhp-hr

Fee Schedule: 1 (b)

Rating: 95 bhp

SIC: 4813

SCC: 20301001

Location/UTM(Km):
562E/3845N

This permit does not authorize the emission of air contaminants in excess of those allowed by law, including Division 26 of the Health and Safety Code of the State of California and the Rules and Regulations of the District. This permit cannot be construed as permission to violate existing laws, ordinances, statutes or regulations of this or other governmental agencies. This permit must be renewed by the expiration date above. If billing for renewal fee required by Rule 301(c) is not received by expiration date above, please contact the District.

GTP Towers I, LLC
10 Presidential Way - HazMat Compliance
Woburn, MA 01801

By: **COPY**
Brad Poiriez
Executive Director

CONDITIONS:

1. This stationary, spark-ignited, internal combustion engine, certified in accordance with 40 CFR Part 1048, and its associated control devices shall be installed, operated and maintained according to the manufacturer's emission-related written instructions. Further, the owner/operator shall change only those emission-related settings that are permitted by the manufacturer. Unless otherwise noted, this equipment shall also be operated in accordance with all data and specifications submitted with the application for this permit.
[40 CFR 60.4231(c); 60.4233(c); 60.4234; and 60.4243(a)(2)(ii)]

2. A non-resettable four-digit (9,999) hour timer shall be installed and maintained on this unit to indicate elapsed engine operating time.
[District Rule 1160(E)(1)(a)(ii)]

3. This unit shall be fired on commercial grade Liquefied Petroleum Gas (LPG) fuel only to meet the requirements of less than 500 ppm by weight.
[District Rule 204 and 431]

4. The Air-to-Fuel Ratio Controller shall be used in conjunction with the control device and shall be maintained and operated appropriately to ensure proper operation of the engine and control device to minimize emissions at all times.
[40 CFR 60.4243(g)]

5. The owner/operator shall maintain an operations log for this unit current and on-site (or at a central location) for a minimum of five (5) years, and this log shall be provided to District, State and Federal personnel upon request. The log shall include, at a minimum, the information specified below:

- a. District Permit number, unit identification number, and Emissions Control Equipment identification number, when applicable.
- b. Date of each use and duration of each use (in hours);
- c. Reason for use (testing & maintenance, emergency, required emission testing);
- d. Quarterly annual operation in terms of fuel consumption (in standard cubic feet or gallons) and total hours;
- e. Records of all inspections, maintenance and repair actions; and,
- f. Records of all maintenance and repair actions performed on the air/fuel ratio controller, and the three-way catalyst, including date and description.

[District Rule 204; District Rule 1302; District Rule 1160(E)(2); 40 CFR 60.4245]

6. The owner/operator must comply with the following emission standards, as referenced below, over the entire life of the engine. Compliance must be determined in accordance with the installation and operation of a certified engine with EPA Engine Family TARWB06.5PNA.

Maximum Allowed Emission Standards:

- a. NMHC + NOx: 1.4 g/kW-hr (per EPA Large Spark Ignition Certification Data for TARWB06.5PNA);
- b. CO: 1.0 g/kW-hr (per EPA Large Spark Ignition Certification Data for TARWB06.5PN), and
- c. NOx: 0.49 g/kW-hr (per EPA Large Spark Ignition Certification Data for TARWB06.5PN).

Note: Emission standards are from EPA Arrow Engine Company Statement of Large Spark Ignition Certification Data for TARWB06.5PNA that was found in EPA's Annual Certification Data on 4/17/26. This complies with the Emission standards of Subpart JJJJ via 40 CFR 1048 Table 1.

[District Rules 1302; District Rule 1160(C); 40 CFR 60.4231(c); 40 CFR 1048]

7. In the event that the Three-Way Catalytic Converter is replaced, the new (replacement) Catalytic Converter must be of the same Manufacturer and model designation and it must be installed by Factory Certified personnel to avoid follow-on source testing. If the Manufacturer or the Model designation of the new (replacement) catalytic converter is not identical to the original catalytic converter and/or if the unit is not installed by Factory Certified personnel, then the engine shall be source tested in accordance with the procedures outlined in 40 CFR 60.4244 within 90 days after the catalytic converter replacement. The source test results must verify that the engine meets the emission limits found in Condition 6.

The owner/operator must submit a compliance/certification test protocol at least thirty (30) days prior to the compliance/certification test date. The owner/operator must conduct all required compliance/certification tests in accordance with a District-approved test protocol. The owner/operator must notify the District a minimum of ten (10) days prior to the compliance/certification test date so that an observer

may be present. The final compliance/certification test results must be submitted to the District within sixty (60) days of completion of the test. All compliance/certification test notifications, protocols, and results may be submitted electronically to reporting@mdaqmd.ca.gov [District Rule 204; 40 CFR 60.4243; 40 CFR 60.4244]

8. This engine must be inspected at least once each quarter or after every 2,000 hours of operation, whichever is more frequent. An inspection includes any testing, maintenance, and/or other procedures that ensure the engine is operated in strict accordance with the manufacturer's specifications and in continual compliance with the provisions of District Rule 1160. Records of such inspections must include the following information as a minimum:

- a. Inspection Date;
- b. Records of testing, as applicable; and
- c. Records of maintenance.

[District Rule 1160(E)(1)(a)]

9. This engine is subject to the requirements of the New Source Performance Standards (NSPS) for Stationary Spark Ignition IC Engines (40 CFR 60, Subpart JJJJ).

[40 CFR 60.4231(c), District Rule 1302]

10. A facility wide Comprehensive Emission Inventory (CEI) for all emitted criteria and toxic air pollutants must be submitted to the District, in a format approved by the District, upon District request. For the purposes of CEI, Facility is defined as every structure, appurtenance, installation, and improvement on land which is associated with a source of air releases or potential air releases of a hazardous material.

[District Rule 107(b); H&S Code 39607 & 44341-44342; 17 CCR 93400 et seq.; and 40 CFR 51, Subpart A]