

EXHIBIT F

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Estimated Impact of Generating Sources on the State Implementation Plan for Air Quality

Will-Power UT, LLC (“Will-Power”) has applied for the requisite Power Gen Air Permit with the Utah Department of Environmental Quality. The proposed operation of the Aquila Power Station conforms to Utah’s State Implementation Plan for Air Quality, as it will not cause or contribute to any new air quality violations, increase the frequency or severity of existing violations, or delay timely attainment of national ambient air quality standards (NAAQS) as supported by the materials provided herein.



State of Utah

SPENCER J. COX
Governor

DEIDRE HENDERSON
Lieutenant Governor

Department of
Environmental Quality

Tim Davis
Executive Director

DIVISION OF AIR QUALITY
Bryce C. Bird
Director

DAQE-MN163220001A-26

MEMORANDUM

TO: [REDACTED]
FROM: [REDACTED]
DATE: April 23, 2026
SUBJECT: Modeling Analysis Review for the Notice of Intent for Will-Power UT, LLC, Utah County, Utah

This is not a Major Prevention of Significant Deterioration (PSD) Source.

I. OBJECTIVE

Will-Power UT, LLC (Will-Power) proposes to construct and operate a new power generation facility in Eagle Mountain, Utah (the facility). The facility is located at [REDACTED] within an area of Utah County designated as a marginal nonattainment area of the National Ambient Air Quality Standards (NAAQS) for 2015 8-hour ozone; and, as a maintenance area of particulate matter with an aerodynamic diameter of 10 microns or less (PM10). Oxides of nitrogen (NOX) and volatile organic compounds (VOCs) are considered precursors to ozone. This area of Utah County is in attainment for all other criteria pollutants. This Notice of Intent (NOI) air permit application has been developed to request an Approval Order (AO) for the facility. Will-Power proposes to install [REDACTED]

This report, prepared by the Staff of the New Source Review Section (NSR), contains a review of the air quality impact analysis (AQIA) including the information, data, assumptions and modeling results used to determine if the facility will be in compliance with applicable State and Federal concentration standards.

II. APPLICABLE RULE(S)

Utah Air Quality Rules:

R307-401-6	Condition for Issuing an Approval Order
R307-410-3	Use of Dispersion Models
R307-410-4	Modeling of Criteria Pollutants in Attainment Areas

III. MODELING METHODOLOGY

A. Applicability

Emissions from the facility include [REDACTED]

B. Assumptions

1. Topography/Terrain

The Plant is at an elevation of [REDACTED] feet with terrain features that have an affect on concentration predictions.

a. Zone: [REDACTED]

b. Approximate Location:

UTM (NAD83): [REDACTED]

2. Urban or Rural Area Designation

After a review of the appropriate 7.5 minute quadrangles, it was concluded the area is "rural" for air modeling purposes.

3. Ambient Air

It was determined the Plant boundary used in the AQIA meets the State's definition of ambient air.

4. Building Downwash

The source was modeled with the AERMOD model. All structures at the plant were used in the model to account for their influence on downwash.

5. Meteorology

Five (5) years of off-site surface and upper air data were used in the analysis consisting of the following:

Surface – Salt Lake City, UT NWS: 2017-2021
Upper Air – Salt Lake City, UT NWS: 2017-2021

6. Background

The background concentrations for PM₁₀, PM_{2.5}, and NO₂ were based on concentrations measured in Herriman, Utah. The background concentrations for CO were based on concentrations measured in Lindon, Utah.

7. Receptor and Terrain Elevations

The modeling domain used by the Applicant consisted of receptors including property boundary receptors. This area of the state contains mountainous terrain and the modeling domain has simple and complex terrain features in the near and far fields. Therefore, receptor points representing actual terrain elevations from the area were used in the analysis.

8. Model and Options

The State-accepted AERMOD model was used to predict air pollutant concentrations under a simple/complex terrain/wake effect situation. In quantifying concentrations, the regulatory default option was selected.

9. Air Pollutant Emission Rates

See Appendix A for Source Emission Rates

10. Source Location and Parameters

See Appendix B for Source Parameters

IV. RESULTS AND CONCLUSIONS

A. National Ambient Air Quality Standards

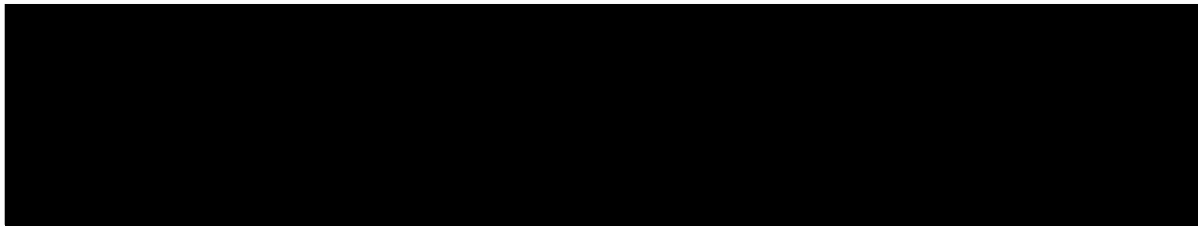
The below table provides a comparison of the predicted total air quality concentrations with the NAAQS. The predicted total concentrations are less than the NAAQS.

Air Pollutant	Period	Prediction (µg/m ³)	Class II Significant Impact Level (µg/m ³)	Background (µg/m ³)	Nearby Sources* (µg/m ³)	Total (µg/m ³)	NAAQS (µg/m ³)	Percent NAAQS
NO ₂	1-Hour							
NO ₂	Annual							
PM _{2.5}	24-Hour							
PM _{2.5}	Annual							
CO	1-Hour							

CO	8-Hour	[REDACTED]
PM ₁₀	24-Hour	[REDACTED]

Air Pollutant	Period	Prediction ($\mu\text{g}/\text{m}^3$)	TSL ($\mu\text{g}/\text{m}^3$)	Percent TSL
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

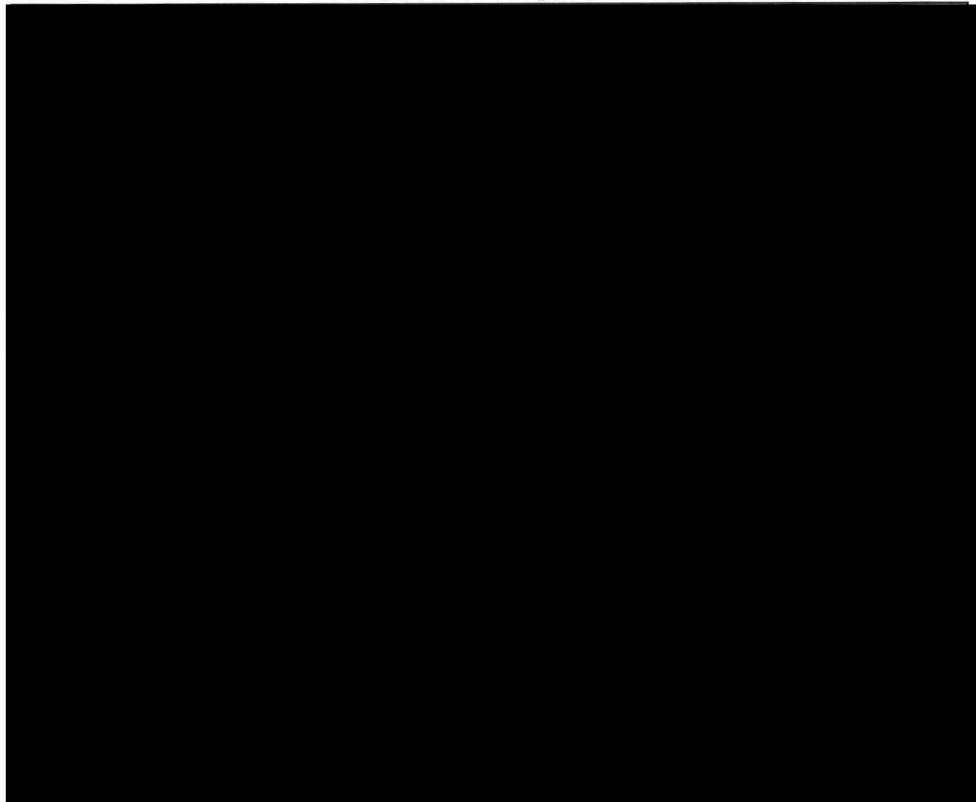
V. PERMIT CONDITIONS

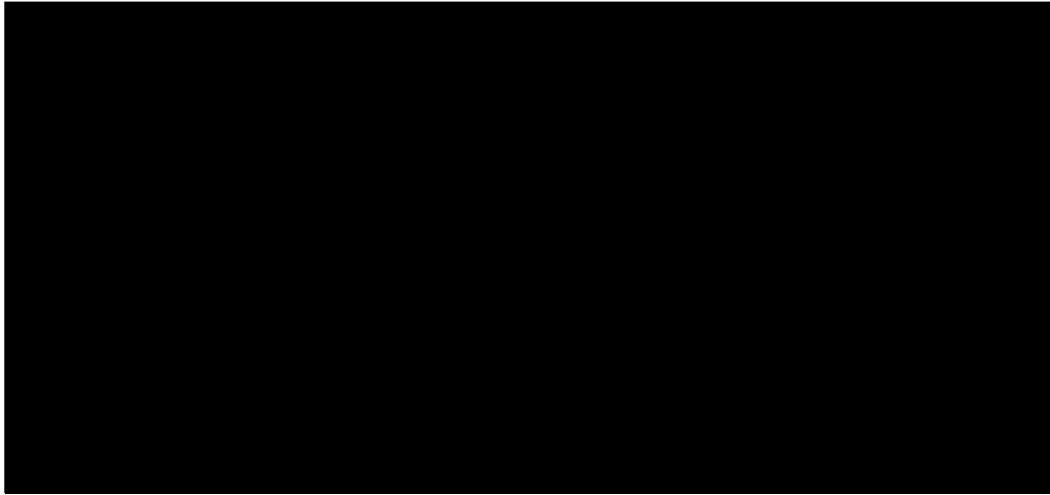


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Appendix A – Source Emission Rates

Will-Power – NO₂ Sources

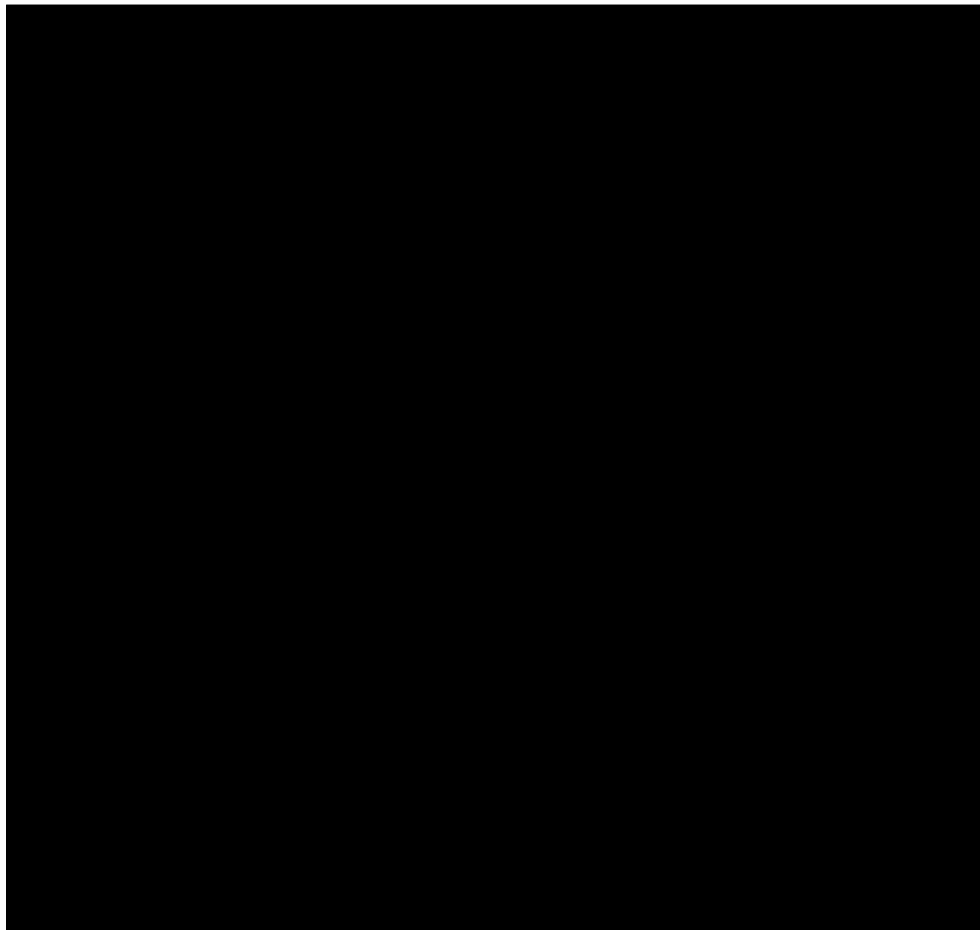


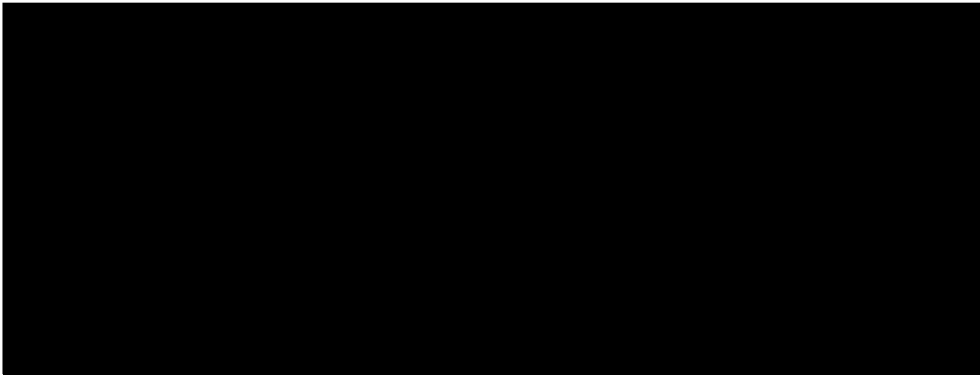


Total



Will-Power – PM_{2.5} Sources

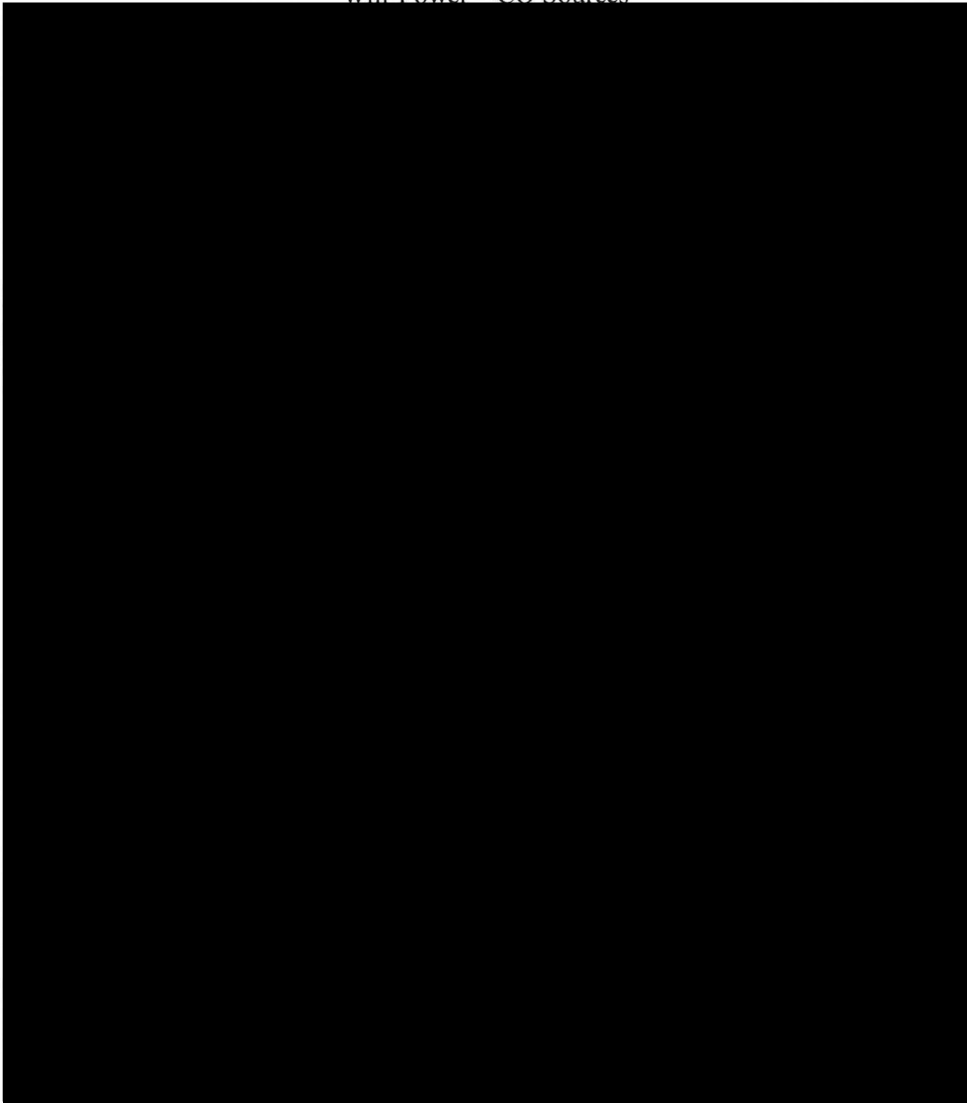


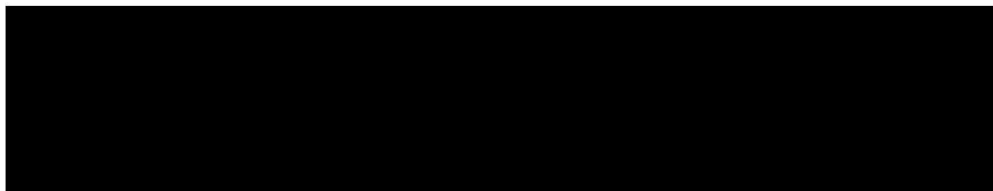


Total



Will-Power – CO Sources





Total



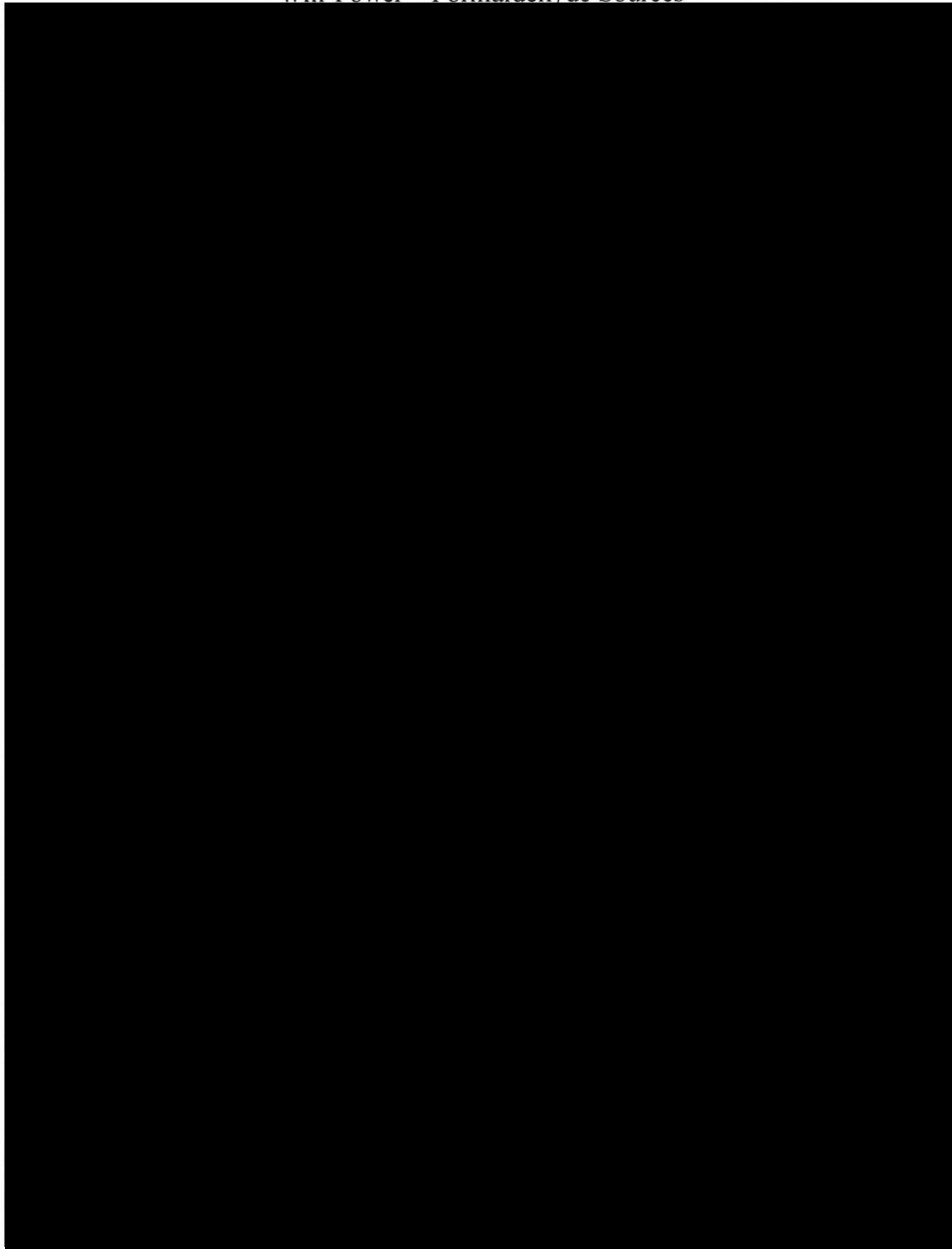
Will-Power – PM₁₀ Sources



Total



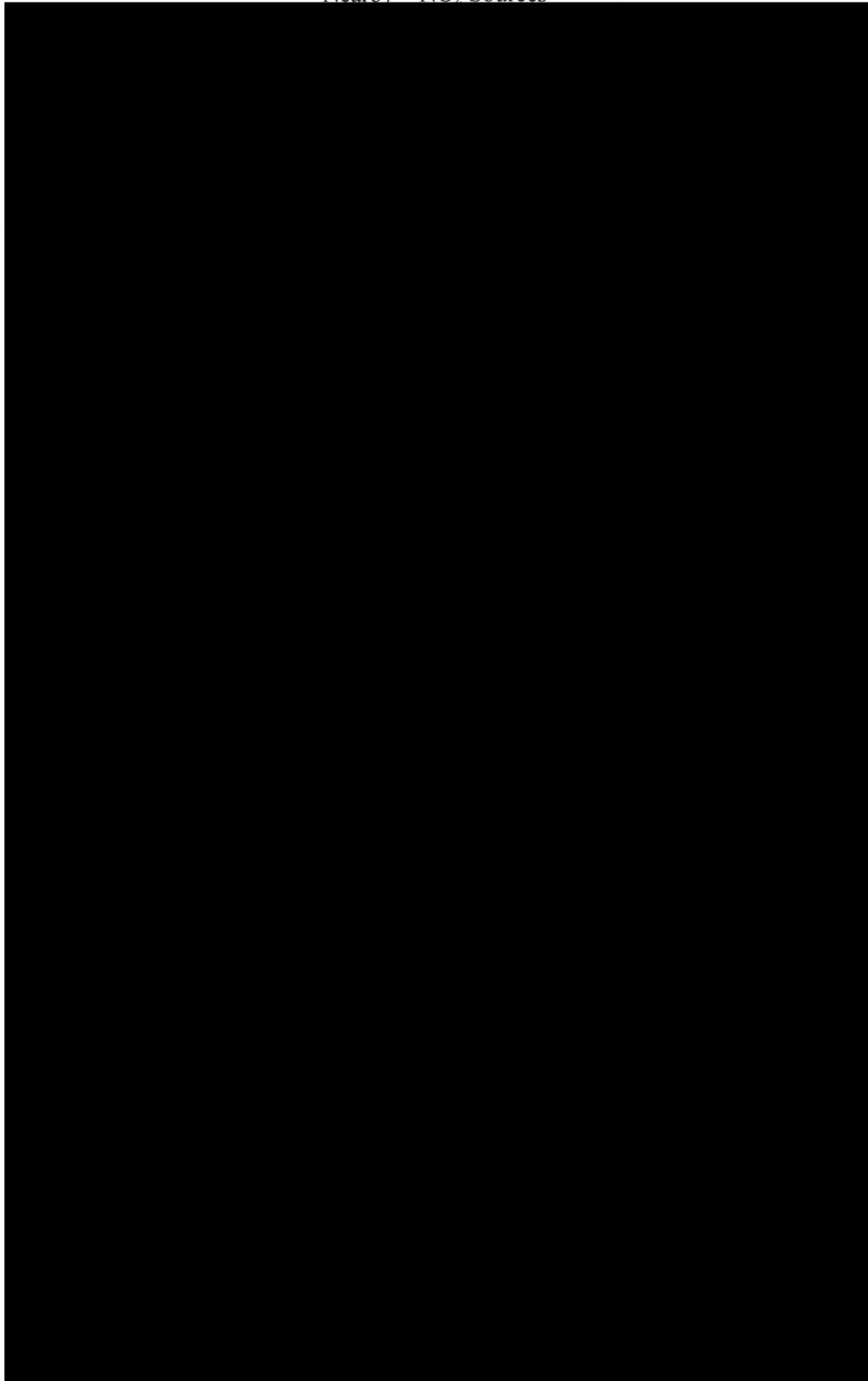
Will-Power – Formaldehyde Sources

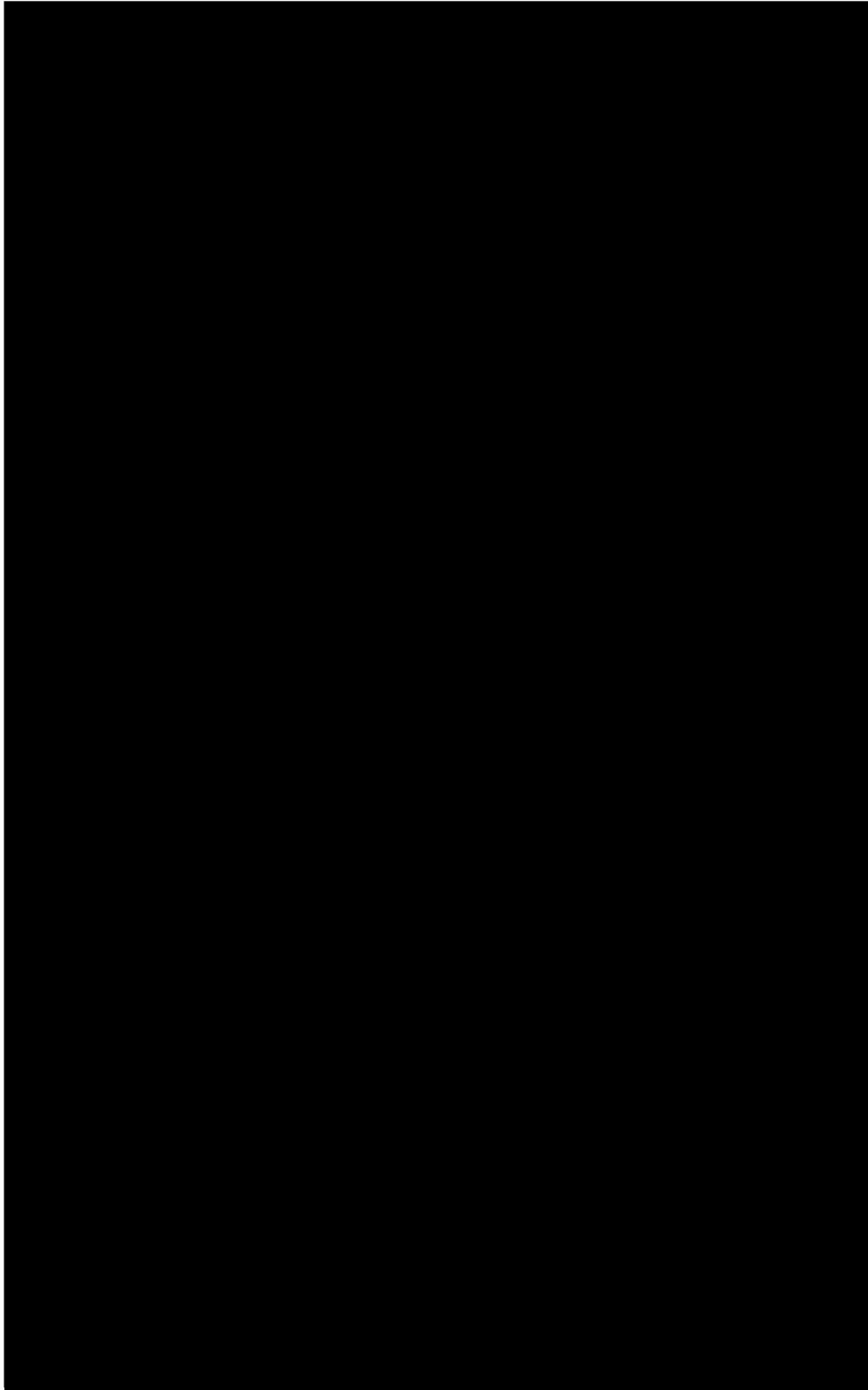


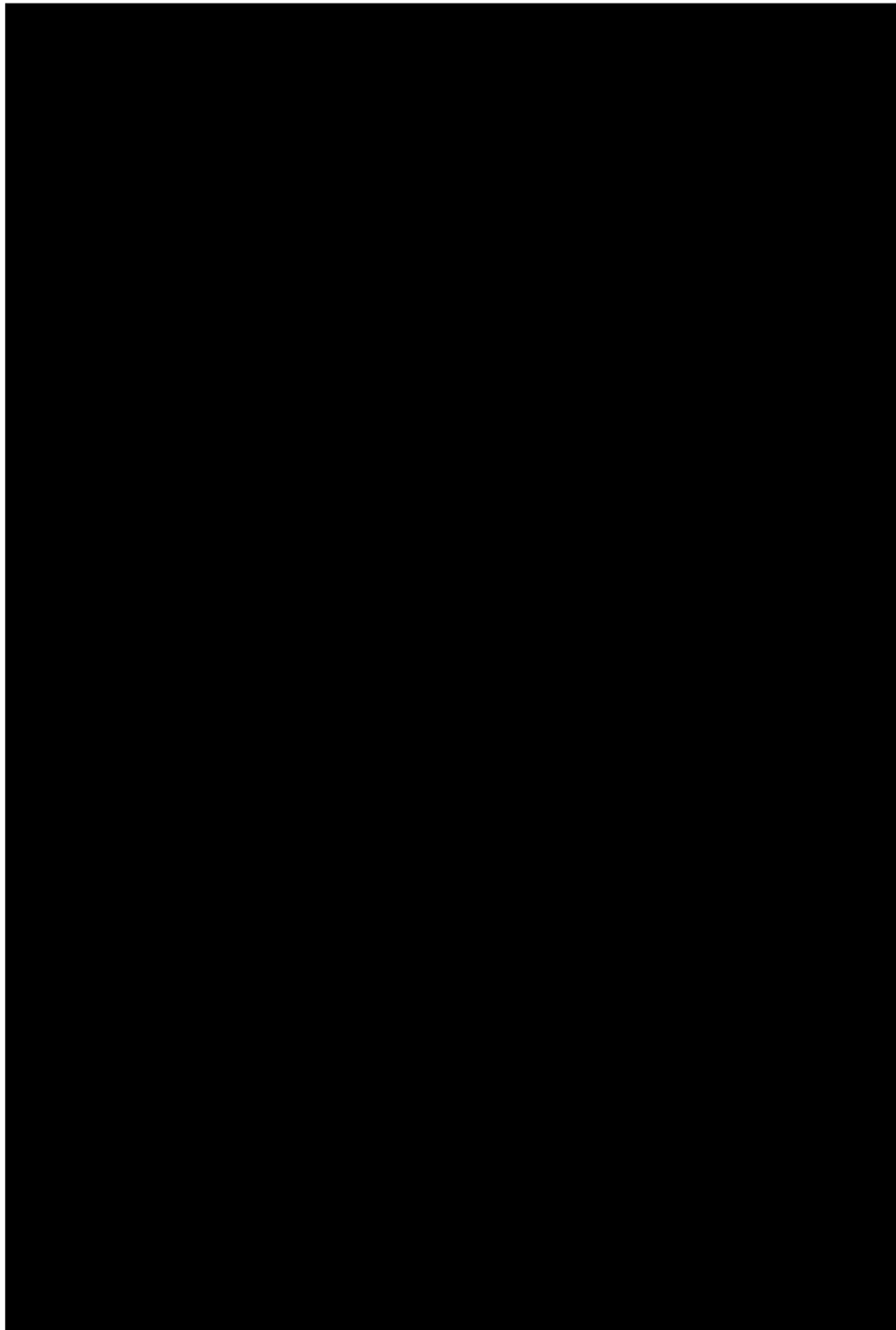
Total



Nearby – NO₂ Sources



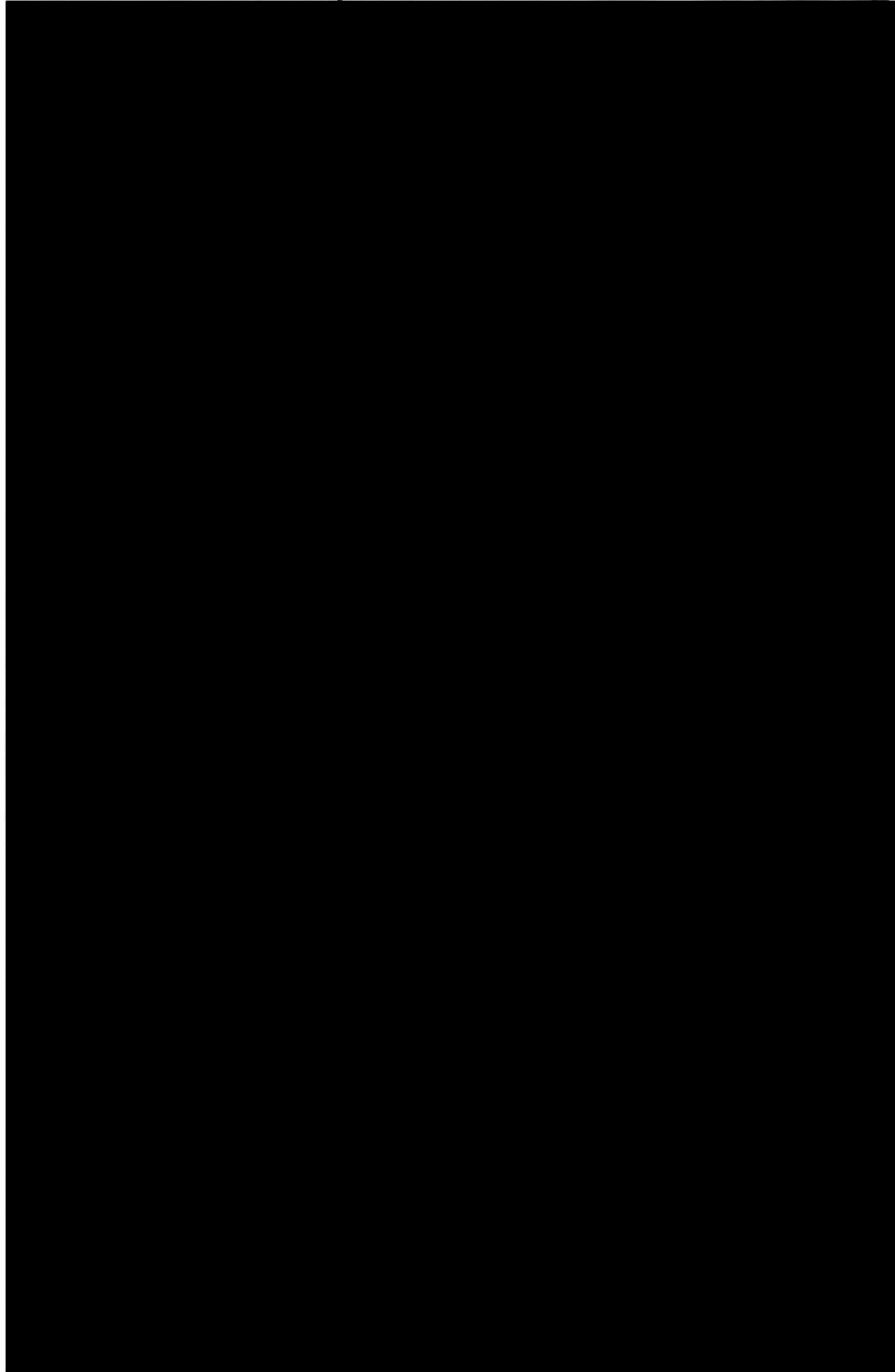




Total



Nearby – PM₁₀ and PM_{2.5} Sources

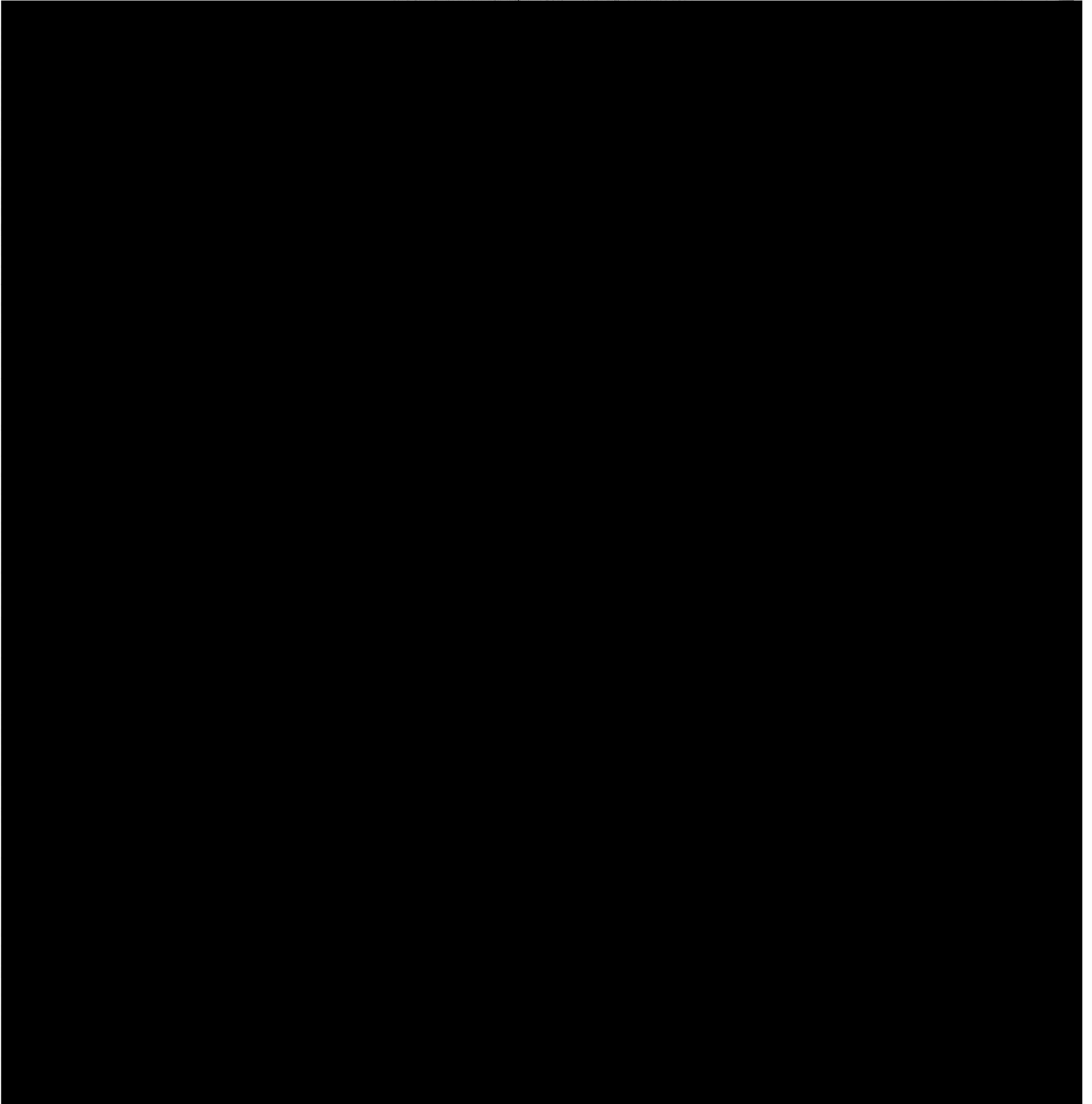


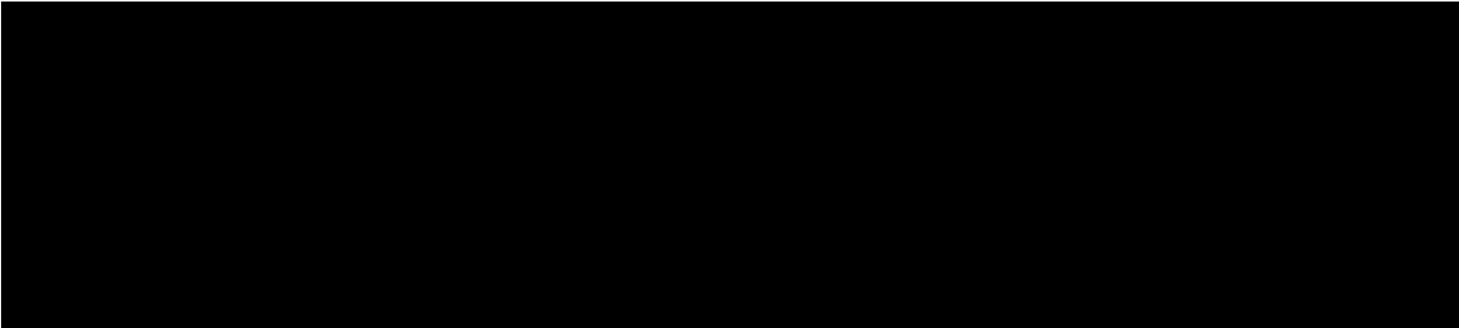


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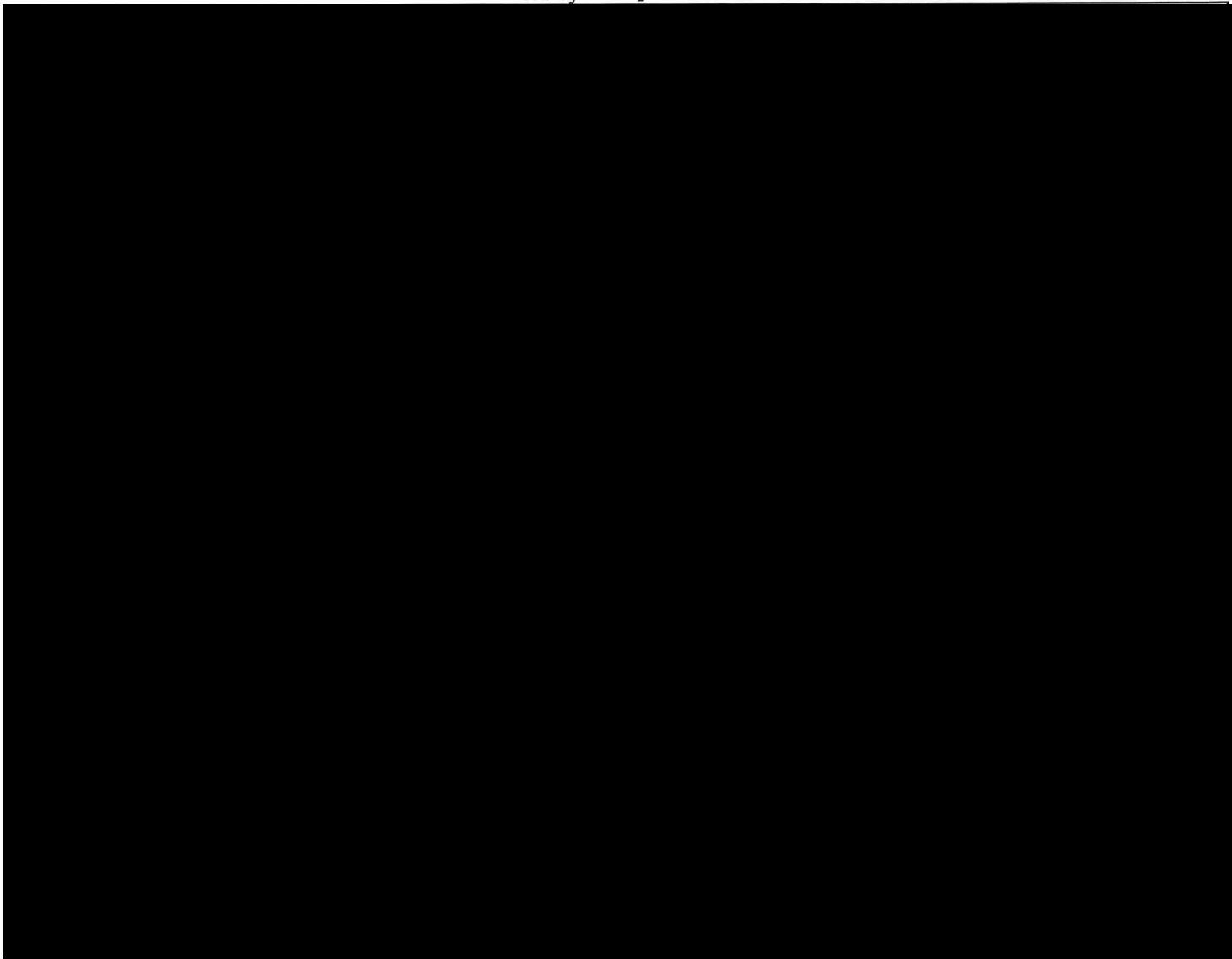


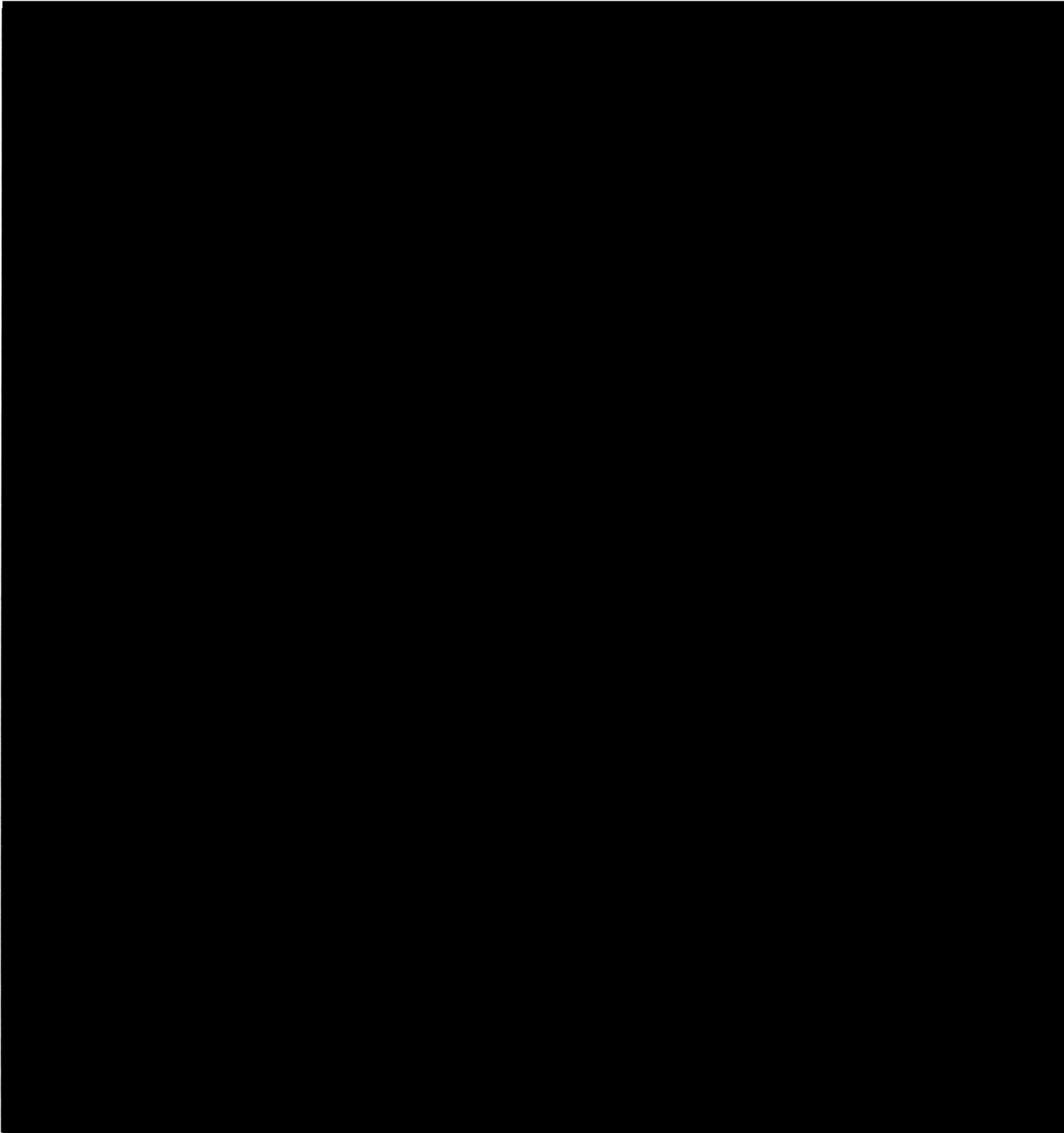
Will-Power UT, LLC – NO₂ Sources

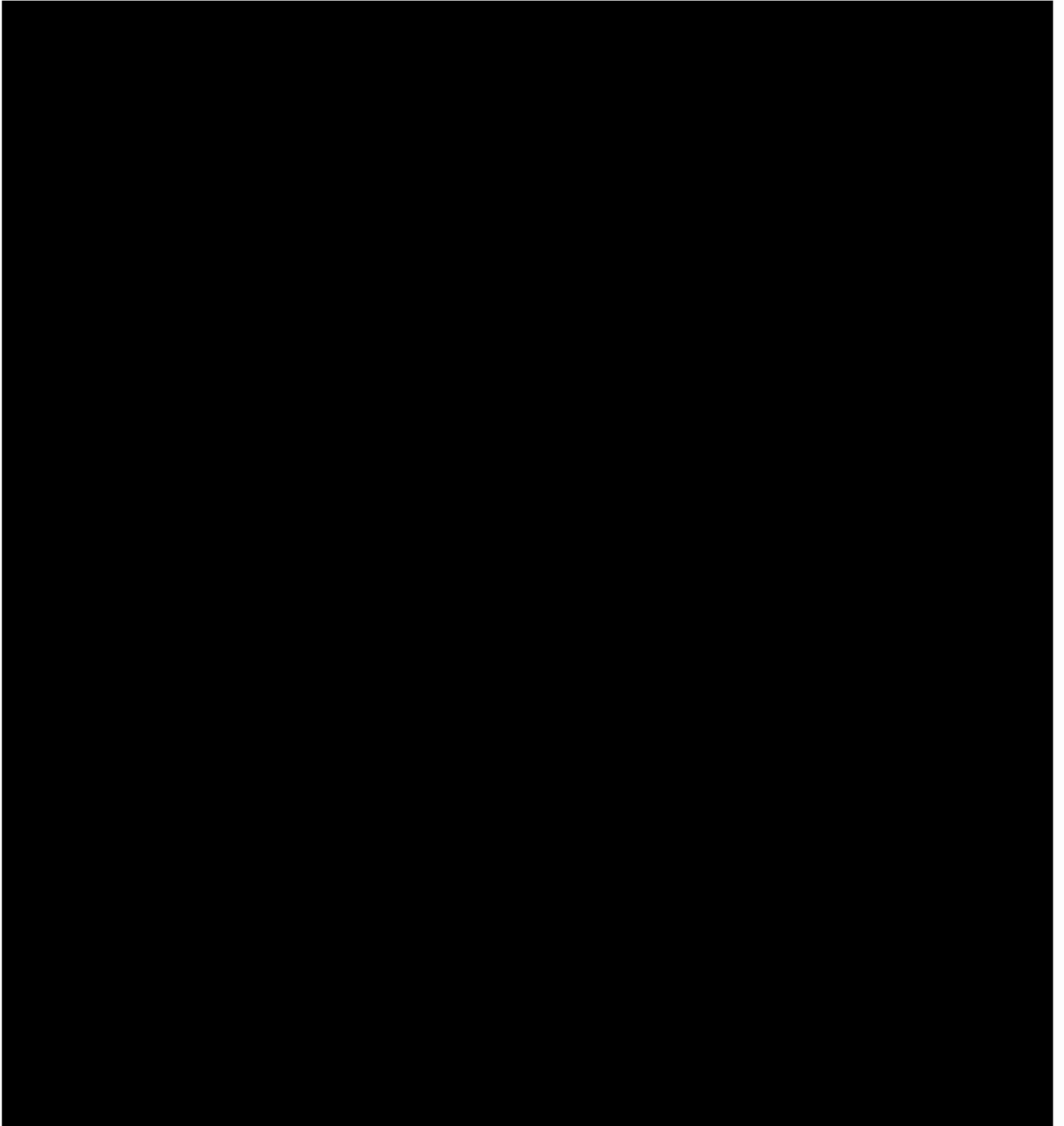


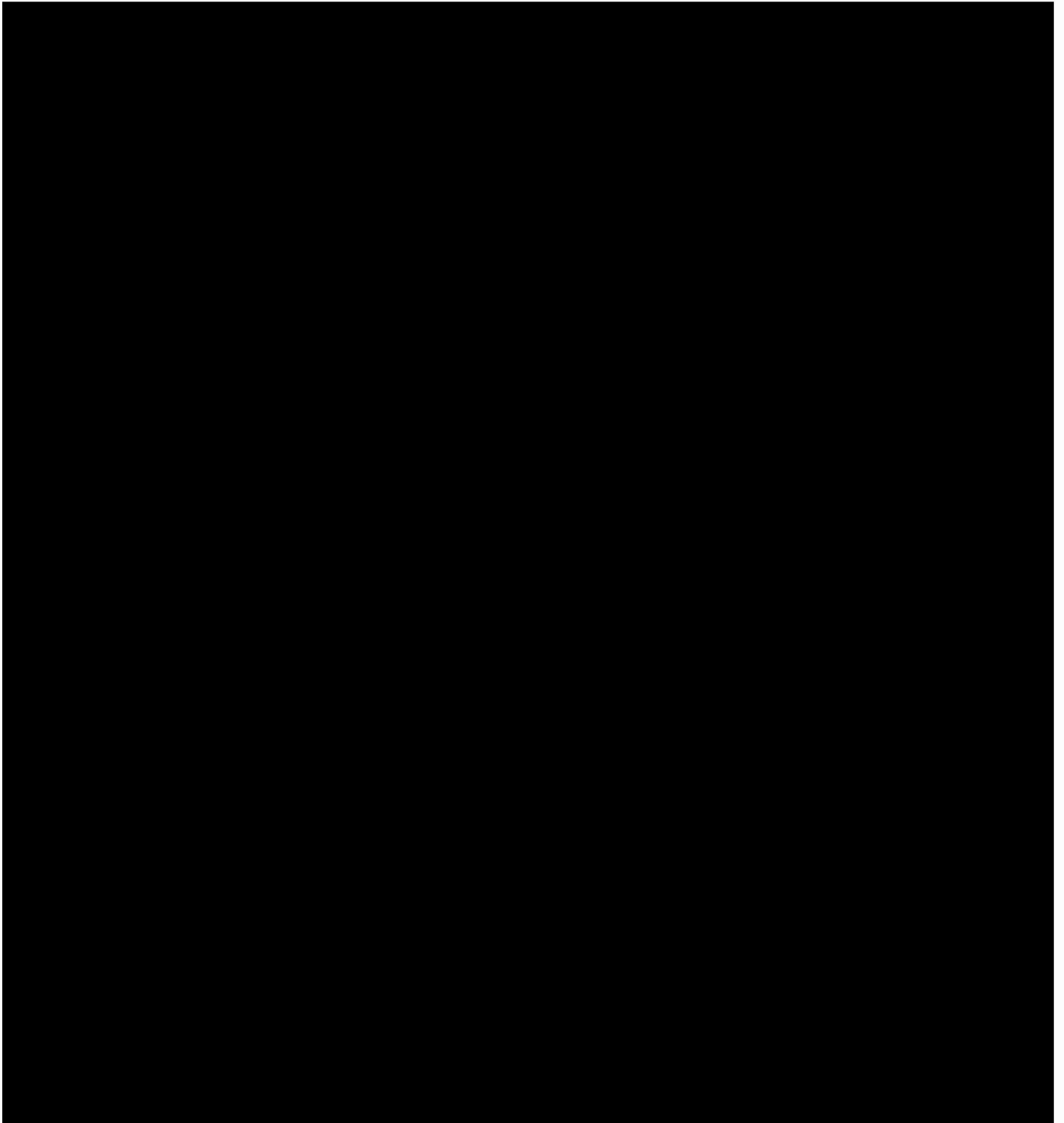


Nearby – NO₂ Sources









Nearby – PM₁₀ and PM_{2.5} Sources

