



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
AIR QUALITY PERMIT



A Permit Is Hereby Issued To
Halyard Energy Henderson, LLC
Authorizing the Construction and Operation of
Halyard Henderson Energy Center
Located at Larue, Henderson County, Texas
Latitude 32° 4' 12" Longitude 95° 41' 0"

Permit: 122733

Issuance Date: _____

Expiration Date: _____

[Handwritten signature]

For the Commission

- 1. Facilities covered by this permit shall be constructed and operated as specified in the application for the permit. All representations regarding construction plans and operation procedures contained in the permit application shall be conditions upon which the permit is issued. Variations from these representations shall be unlawful unless the permit holder first makes application to the Texas Commission on Environmental Quality (commission) Executive Director to amend this permit in that regard and such amendment is approved. [Title 30 Texas Administrative Code 116.116 (30 TAC 116.116)] 1
2. Voiding of Permit. A permit or permit amendment is automatically void if the holder fails to begin construction within 18 months of the date of issuance, discontinues construction for more than 18 months prior to completion, or fails to complete construction within a reasonable time. Upon request, the executive director may grant an 18-month extension. Before the extension is granted the permit may be subject to revision based on best available control technology, lowest achievable emission rate, and netting or offsets as applicable. One additional extension of up to 18 months may be granted if the permit holder demonstrates that emissions from the facility will comply with all rules and regulations of the commission, the intent of the Texas Clean Air Act (TCAA), including protection of the public's health and physical property; and (b)(1)the permit holder is a party to litigation not of the permit holder's initiation regarding the issuance of the permit; or (b)(2) the permit holder has spent, or committed to spend, at least 10 percent of the estimated total cost of the project up to a maximum of \$5 million. A permit holder granted an extension under subsection (b)(1) of this section may receive one subsequent extension if the permit holder meets the conditions of subsection (b)(2) of this section. [30 TAC 116.120(a), (b) and (c)]
3. Construction Progress. Start of construction, construction interruptions exceeding 45 days, and completion of construction shall be reported to the appropriate regional office of the commission not later than 15 working days after occurrence of the event. [30 TAC 116.115(b)(2)(A)]
4. Start-up Notification. The appropriate air program regional office shall be notified prior to the commencement of operations of the facilities authorized by the permit in such a manner that a representative of the commission may be present. The permit holder shall provide a separate notification for the commencement of operations for each unit of phased construction, which may involve a series of units commencing operations at different times. Prior to operation of the facilities authorized by the permit, the permit holder shall identify the source or sources of allowances to be utilized for compliance with Chapter 101, Subchapter H, Division 3 of this title (relating to Mass Emissions Cap and Trade Program). [30 TAC 116.115(b)(2)(B)(iii)]
5. Sampling Requirements. If sampling is required, the permit holder shall contact the commission's Office of Compliance and Enforcement prior to sampling to obtain the proper data forms and procedures. All sampling and testing procedures must be approved by the executive director and coordinated with the regional representatives of the commission. The permit holder is

also responsible for providing sampling facilities and conducting the sampling operations or contracting with an independent sampling consultant. [30 TAC 116.115(b)(2)(C)]

6. **Equivalency of Methods.** The permit holder must demonstrate or otherwise justify the equivalency of emission control methods, sampling or other emission testing methods, and monitoring methods proposed as alternatives to methods indicated in the conditions of the permit. Alternative methods shall be applied for in writing and must be reviewed and approved by the executive director prior to their use in fulfilling any requirements of the permit. [30 TAC 116.115(b)(2)(D)]
7. **Recordkeeping.** The permit holder shall maintain a copy of the permit along with records containing the information and data sufficient to demonstrate compliance with the permit, including production records and operating hours; keep all required records in a file at the plant site. If, however, the facility normally operates unattended, records shall be maintained at the nearest staffed location within Texas specified in the application; make the records available at the request of personnel from the commission or any air pollution control program having jurisdiction; comply with any additional recordkeeping requirements specified in special conditions attached to the permit; and retain information in the file for at least two years following the date that the information or data is obtained. [30 TAC 116.115(b)(2)(E)]
8. **Maximum Allowable Emission Rates.** The total emissions of air contaminants from any of the sources of emissions must not exceed the values stated on the table attached to the permit entitled "Emission Sources--Maximum Allowable Emission Rates." [30 TAC 116.115(b)(2)(F)]¹
9. **Maintenance of Emission Control.** The permitted facilities shall not be operated unless all air pollution emission capture and abatement equipment is maintained in good working order and operating properly during normal facility operations. The permit holder shall provide notification for upsets and maintenance in accordance with 30 TAC 101.201, 101.211, and 101.221 of this title (relating to Emissions Event Reporting and Recordkeeping Requirements; Scheduled Maintenance, Startup, and Shutdown Reporting and Recordkeeping Requirements; and Operational Requirements). [30 TAC 116.115(b)(2)(G)]
10. **Compliance with Rules.** Acceptance of a permit by an applicant constitutes an acknowledgment and agreement that the permit holder will comply with all rules, regulations, and orders of the commission issued in conformity with the TCAA and the conditions precedent to the granting of the permit. If more than one state or federal rule or regulation or permit condition is applicable, the most stringent limit or condition shall govern and be the standard by which compliance shall be demonstrated. Acceptance includes consent to the entrance of commission employees and agents into the permitted premises at reasonable times to investigate conditions relating to the emission or concentration of air contaminants, including compliance with the permit. [30 TAC 116.115(b)(2)(H)]
11. **This** permit may not be transferred, assigned, or conveyed by the holder except as provided by rule. [30 TAC 116.110(e)]
12. **There** may be additional special conditions attached to a permit upon issuance or modification of the permit. Such conditions in a permit may be more restrictive than the requirements of Title 30 of the Texas Administrative Code. [30 TAC 116.115(c)]
13. **Emissions** from this facility must not cause or contribute to a condition of "air pollution" as defined in Texas Health and Safety Code (THSC) 382.003(3) or violate THSC 382.085. If the executive director determines that such a condition or violation occurs, the holder shall implement additional abatement measures as necessary to control or prevent the condition or violation.
14. **The** permit holder shall comply with all the requirements of this permit. Emissions that exceed the limits of this permit are not authorized and are violations of this permit.¹

¹ Please be advised that the requirements of this provision of the general conditions may not be applicable to greenhouse gas emissions.

Special Conditions

Permit Number 122733

Emission Rates and Permit Representations

1. This permit authorizes an electric generating facility (EGF) and associated operations located near Larue in Henderson County.

This permit covers only those sources of emissions listed in the attached table entitled "Emission Sources - Maximum Allowable Emission Rates," and those sources are limited to the emission limits and other conditions specified in the attached table. The annual rates are based on any consecutive 12-month period. In addition, this permit authorizes planned maintenance, startup, and shutdown (MSS) activities which comply with the emission limits in the maximum allowable emission rates table (MAERT).

2. This permit authorizes two natural gas fired combustion generators (CTGs) to operate in simple cycle mode [Emission Point Numbers (EPNs): CTG.03-1 and CTG.03-2 or CTG.05-1 and CTG.05-2 or CTSF5-1 and CTSF5-2] from the following options:
 - A. Option 1: Two General Electric Model 7FA.03 CTGs each rated at nominal capability of 193 gross megawatts (MW).
 - B. Option 2: Two General Electric Model 7FA.05 CTGs each rated at nominal capability of 231 gross megawatts (MW).
 - C. Option 3: Two Siemens Model SGT6-5000 F5ee CTGs each rated at nominal capability of 242 gross megawatts (MW).
3. The phrase "the gas turbines" in this permit refers to the two simple-cycle combustion gas turbines identified with EPN Nos. CTG.03-1 and CTG.03-2 or CTG.05-1 and CTG.05-2 or CTSF5-1 and CTSF5-2. The phrase "each gas turbine" in this permit refers to one of the gas turbines as identified by one of the EPNs listed in this condition.

Emission Standards and Operating Specifications

4. Fuel for the gas turbines authorized by this permit shall be limited to firing pipeline-quality natural gas containing no more than 5.0 grains total sulfur per 100 dry standard cubic feet (dscf) on an hourly basis, and 0.5 grains total sulfur per 100 dscf on an annual basis.

5. The concentration of nitrogen oxide (NO_x) in the stack gases from each gas turbine shall not exceed a three-hour rolling average concentration of 9 parts per million by volume dry (ppmvd). The concentration of carbon monoxide (CO) in the stack gases from each gas turbine shall not exceed a three-hour rolling average concentration of 9 ppmvd. The NO_x and CO concentrations shall be corrected to 15 percent oxygen (O₂). The emission limits identified in this special condition do not apply during MSS activities.
6. Each gas turbine is limited to 2,500 operating hours on a rolling 12-month period.
7. The Firewater Pump and Emergency Generator (EPNs FWP-01 and EGEN-01) are authorized to fire diesel fuel containing no more than 15 parts per million by weight (ppmw) sulfur and each engine is limited to a maximum of 100 non-emergency hours of operation annually.
8. Except during MSS activities, the opacity shall not exceed five percent (5%) averaged over a six-minute period from each stack or vent. During MSS activities, the opacity shall not exceed fifteen percent (15%) (or other applicable opacity limit specified in 30 TAC § 111.111(a)(1)). Each determination shall be made by first observing for visible emissions while each gas turbine is in operation. Observations shall be made at least 15 feet and no more than 0.25 miles from the emission point. If visible emissions are observed from an emission point, then the opacity shall be determined and documented within 24 hours for that emission point using Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60), Appendix A, Test Method 9. Contributions from uncombined water shall not be included in determining compliance with this condition. Observations shall be performed and recorded quarterly. If the opacity exceeds 5% during normal operations or 15% during MSS activities, corrective action to eliminate the source of visible emissions shall be taken promptly and documented within one (1) week of first observation.
9. Upon request by the Executive Director of the Texas Commission on Environmental Quality (TCEQ) or any air pollution control program having jurisdiction, the holder of this permit shall provide a sample and/or an analysis of the fuel fired in the gas turbines or shall allow air pollution control agency representatives to obtain a sample for analysis.

Planned Maintenance, Start-up and Shutdown

10. The holder of this permit shall minimize emissions during planned MSS activities by operating the facility and associated air pollution control equipment in accordance with good air pollution control practices, safe operating practices, and protection of the facility.

11. Emissions during planned startup and shutdown activities will be minimized by limiting the duration of operation in planned startup and shutdown mode as follows:
 - A. A planned startup of the gas turbines is defined as the period that begins with first fire/ignition and ends when the CTG achieves approximately 50% load. A planned startup for that CTG is limited to 60 consecutive minutes.
 - B. A planned shutdown of the gas turbines is defined as the period that begins when the CTG switches from approximately 50% load with the intent to shut down and ends when combustion stops. A planned shutdown for that CTG is limited to 60 consecutive minutes.

Federal Applicability

12. These facilities shall comply with applicable requirements of the EPA regulations in 40 CFR Part 60 on Standards of Performance for New Stationary Sources promulgated for:
 - A. Applicable General Conditions of Subpart A.
 - B. The gas turbines are subject to the applicable requirements of Subpart GG for GE 7FA.03 turbines or Subpart KKKK for GE 7FA.05 or Siemens F5ee turbines.
 - C. The diesel engines for the Fire Water Pump (EPN: FWP-01) and Emergency Generator (EPN: EGEN-01) are subject to the applicable requirements of Subpart IIII.
13. The diesel engines for the Fire Water Pump (EPN: FWP-01) and Emergency Generator (EPN: EGEN-01) are subject to the applicable requirements of 40 CFR Part 63 on National Emission Standards for Hazardous Air Pollutants by Source Category, Subpart ZZZZ.
14. If any condition of this permit is more stringent than the regulations so incorporated, then for the purposes of complying with this permit, the permit shall govern and be the standard by which compliance shall be demonstrated.

Initial Determination of Compliance

15. Sampling ports and platforms shall be incorporated into the design of all exhaust stacks according to the specifications set forth in the attachment entitled "Chapter 2, Stack Sampling Facilities." Alternate sampling facility designs may be submitted for approval by the TCEQ Regional Director.
16. The holder of this permit shall perform stack sampling and other testing as required to establish the actual quantities of air contaminants being emitted into the atmosphere from the gas turbines. The holder of this permit shall perform stack sampling and other testing if requested by the TCEQ Regional Director to establish the actual quantities of air contaminants being emitted into the atmosphere from the gas turbines. Sampling shall be conducted in accordance with the appropriate procedures of the TCEQ Sampling Procedures Manual and in accordance with EPA Test Methods or by other equivalent methods approved by the TCEQ Regional Director.

Fuel sampling using the methods and procedures of 40 CFR § 60.334(h) may be conducted in lieu of stack sampling for sulfur dioxide (SO₂). If fuel sampling is used, compliance with New Source Performance Standards (NSPS), Subpart GG or KKKK SO₂ limits shall be based on one hundred percent (100%) conversion of the sulfur in the fuel to SO₂. Any deviations from those procedures must be approved by the Executive Director of the TCEQ prior to sampling. The TCEQ Executive Director or his designated representative shall be afforded the opportunity to observe all such sampling.

The holder of this permit is responsible for providing sampling and testing facilities and conducting the sampling and testing operations at his expense.

- A. The TCEQ Regional Office shall be contacted as soon as testing is scheduled but not less than 30 days prior to sampling to schedule a pretest meeting. The notice shall include:
 - (1) Date for pretest meeting.
 - (2) Date sampling will occur.
 - (3) Name of firm conducting sampling.
 - (4) Type of sampling equipment to be used.
 - (5) Method or procedure to be used in sampling.
 - (6) Procedure used to determine turbine loads during and after the sampling period.

The purpose of the pretest meeting is to review the necessary sampling and testing procedures, to provide the proper data forms for recording pertinent data, and to review the format procedures for submitting the test reports. A written proposed description of any deviation from sampling procedures specified in permit conditions or TCEQ or EPA sampling procedures shall be made available to the TCEQ prior to the pretest meeting. The TCEQ Regional Director shall approve or disapprove of any deviation from specified sampling procedures. Requests to waive testing for any air contaminant specified in this condition shall be submitted to the TCEQ Office of Air, Air Permits Division. Test waivers and alternate or equivalent procedure proposals for NSPS testing which must have EPA approval shall be submitted to the EPA and copied to TCEQ Regional Director.

- B. Air contaminants and diluents from the gas turbines to be sampled and analyzed include NO_x, CO, volatile organic compounds (VOC), SO₂, opacity, and O₂. (As noted above, fuel sampling using the methods and procedures of 40 CFR § 60.334(h) may be conducted in lieu of stack sampling for SO₂).
- C. Each CTG shall be tested at or above ninety percent (90%) of maximum load operations.
- D. Sampling, as required by this condition, shall occur within 60 days after achieving the maximum production, but no later than 180 days after initial start-up of each gas turbine. Additional sampling shall occur as may be required by the TCEQ or EPA.
- E. Within 60 days after the completion of the testing and sampling required herein, two (2) copies of the sampling reports shall be sent to the TCEQ Regional Office.

Continuous Determination of Compliance

- 17. The holder of this permit shall install, calibrate, maintain, and operate a continuous emissions monitoring system (CEMS) to measure and record the concentrations of NO_x, CO, and diluent gases (O₂ or carbon dioxide [CO₂]), from each gas turbine exhaust stack.
 - A. The CEMS shall meet the design and performance specifications, pass the field tests, and meet the installation requirements and the data analysis and reporting requirements specified in the applicable Performance Specification Nos. 1 through 9, 40 CFR Part 60, Appendix B, or an acceptable alternative. If

there are no applicable performance specifications in 40 CFR Part 60, Appendix B, contact the TCEQ Office of Air, Air Permits Division in Austin for requirements to be met. The CEMS shall comply with the following requirements:

The holder of this permit shall assure that the CEMS meets the applicable quality-assurance requirements specified in 40 CFR Part 60, Appendix F, Procedure 1, or an acceptable alternative. Relative accuracy exceedances, as specified in 40 CFR Part 60, Appendix F, § 5.2.3, and any CEMS downtime and all cylinder gas audit exceedances of ± 5 percent accuracy shall be reported semiannually to the TCEQ Regional Director, and necessary corrective action shall be taken. Supplemental stack concentration measurements may be required at the discretion of the TCEQ Regional Director.

- B. The monitoring data shall be reduced to hourly average values at least once every day, using a minimum of four equally-spaced data points from each one-hour period. At least two (2) valid data points shall be generated during the hourly period in which zero and span is performed.
- C. All monitoring data and quality-assurance data shall be maintained by the source for a period of five (5) years and shall be made available to the TCEQ Executive Director or designated representative upon request. The hourly average data from the CEMS may be used to determine compliance with the conditions of this permit. Hourly average concentrations from each gas turbine shall be summed to tons per year (TPY) each month and used to determine compliance with the emission limits of this permit.
- D. The TCEQ Regional Office shall be notified at least 21 days prior to any required relative accuracy test audit in order to provide them the opportunity to observe the testing.
- E. If applicable, the CEMS for each gas turbine stack may be required to meet the design and performance specifications, pass the field tests, and meet the installation requirements and data analysis and reporting requirements specified in the applicable performance specifications in 40 CFR Part 75, Appendix A. The requirements of 40 CFR Part 75, Appendix A and B, respectively, are deemed an acceptable alternative to the performance specifications and quality assurance requirements of 40 CFR Part 60 for the NO_x and O_2 CEMS.

18. If any emission monitor fails to meet specified performance, it shall be repaired or replaced as soon as reasonably possible.
19. The holder of this permit shall install, calibrate, maintain, and operate fuel flow meters to monitor and record the average hourly natural gas consumption of the gas turbines. The systems shall be accurate to ± 5.0 percent of the gas turbine exhaust maximum flow.
20. The permit holder shall determine the emissions during planned MSS activities for use in demonstrating compliance with Special Condition No. 1 as follows:
 - A. For each pollutant whose emissions during normal facility operations are measured with a CEMS that has been certified to measure each pollutant's emissions over the entire range of a planned MSS activity, the permit holder shall measure the emissions of the pollutant during the planned MSS activity using the CEMS.
 - B. For each pollutant not described in Special Condition No. 20A, the permit holder shall calculate each pollutant's emissions during all occurrences of each type of planned MSS activity for each calendar month using the frequency of the planned MSS activity identified in work orders or equivalent records and the emissions of each pollutant during the planned MSS activity as represented in the planned MSS permit application. In lieu of using the emissions of each pollutant during the planned MSS activity as represented in the planned MSS permit application to calculate such emissions, the permit holder may determine the emissions of each pollutant during the planned MSS activity using an appropriate method, including but not limited to, any of the methods described in paragraphs 1 through 4 below, provided that the permit holder maintains appropriate records supporting such determination:
 - (1) Use of emission factor(s), facility-specific parameter(s), and/or engineering knowledge of the facility's operations.
 - (2) Use of emissions data measured (by a CEMS or during emissions testing) during the same type of planned MSS activity occurring at or on a similar facility, and correlation of that data with the facility's relevant operating parameters, including, but not limited to, electric load, temperature, fuel input, and fuel sulfur content.
 - (3) Use of emissions testing data collected during a planned MSS activity occurring at or on the facility, and correlation of that data with the facility's relevant operating parameters, including, but not limited to, electric load, temperature, fuel input, and fuel sulfur content.

- (4) Use of parametric emissions monitoring system (PEMS) data applicable to the facility.

Recordkeeping Requirements

21. The following records shall be kept at the plant for the life of the permit. All records required in this permit shall be made available at the request of personnel from the TCEQ, EPA, or any air pollution control agency with jurisdiction.
 - A. A copy of this permit.
 - B. Permit application dated August 15, 2014, and subsequent representations submitted to the TCEQ.
 - C. A complete copy of the testing reports and records of the initial performance testing completed pursuant to Special Condition No. 16 to demonstrate initial compliance.
 - D. Stack sampling results or other air emissions testing (other than CEMS data) that may be conducted on units authorized under this permit after the date of issuance of this permit.
22. The following information shall be maintained by the holder of this permit in a form suitable for inspection for a period of five (5) years after collection and shall be made immediately available upon request to representatives of the TCEQ, EPA, or any local air pollution control program having jurisdiction:
 - A. The NO_x, CO, and dilutant gases, O₂ or CO₂, CEMS emissions data to demonstrate compliance with the emission limits listed in Special Condition No. 5 and the MAERT.
 - B. Raw data files of all CEMS data including calibration checks and adjustments and maintenance performed on these systems.
 - C. Records of normal hours of operation for each gas turbine on a monthly and rolling 12-month basis, and records of planned MSS activities pursuant to Special Condition No. 20, including the date, time, and duration of those activities, emissions from those activities, and periods when CEMS data have been excluded for purposes of demonstrating compliance with Special Condition Nos. 10 and 11.
 - D. Records of the hours of operation of the firewater pump and emergency diesel

- generator, including date, time, duration of operation.
- E. Records of fuel sampling conducted pursuant to 40 CFR Part 60, Subpart GG or Subpart KKKK as applicable.
 - F. Records of visible emissions and opacity observations and any corrective actions taken as specified in Special Condition No. 8.
 - G. Records of the sulfur content of the diesel fuel fired in the emergency generator and fire water pump engines. Fuel delivery receipts are an acceptable record.
 - H. Records of natural gas fuel usage, including calibration checks of the fuel flow monitoring system, and the sulfur content of the natural gas being fired in the gas turbines to show compliance with Special Condition No. 4.

Additional Permit Requirements

- 23. No later than 60 days prior to startup of the first CTG, the permit holder shall submit an alteration to remove the CTG option that was not chosen for construction, any associated special conditions, and any associated emissions from the MAERT.

Dated 2015

Construction Permit Source Analysis & Technical Review

Company	Halyard Energy Henderson, LLC	Permit Number	122733
City	Larue	Project Number	216318
County	Henderson	Account Number	N/A
Project Type	Initial	Regulated Entity Number	RN107670341
Project Reviewer	Joe Janecka, P.E.	Customer Reference Number	CN604656827
Site Name	Halyard Henderson Energy Center		

Project Overview

Halyard Energy Henderson, LLC (Halyard) submitted an application for construction of an electric generating facility composed of two simple cycle gas-fired turbines near Larue in Henderson County. The application was reviewed and the permit developed to authorize one of three turbine options: General Electric (GE) 7FA.03, GE 7FA.05, or Siemens F5ee.

All planned MSS activities are authorized in the permit and their allowable emission rates depend on the turbine option selected.

Emission Summary

Air Contaminant	Proposed Allowable Emission Rates (tpy)		
	GE 7FA0.3 option	GE 7FA0.5 option	Siemens F5ee option
CO	168.06	246.44	249.2
NO _x	160.07	178.49	190.17
PM	24.11	20.63	26.43
PM ₁₀	24.11	20.63	26.43
PM _{2.5}	24.11	20.63	26.43
SO ₂	3.44	2.7	4.04
VOC	16.61	42.41	31.41
H ₂ SO ₄	0.24	0.26	0.28

Compliance History Evaluation - 30 TAC Chapter 60 Rules

A compliance history report was reviewed on:	09/18/2014
Compliance period:	09/01/2009 to 08/31/2014
Site rating & classification:	UNCLASSIFIED
Company rating & classification:	UNCLASSIFIED
If the rating is 50<RATING<55, what was the outcome, if any, based on the findings in the formal report:	N/A
Has the permit changed on the basis of the compliance history or rating?	No

Public Notice Information - 30 TAC Chapter 39 Rules

Rule Citation	Requirement
39.403	Date Application Received: 08/14/2014
	Date Administratively Complete: 08/25/2014
	Small Business Source? No
	Date Leg Letters mailed: 08/25/2014
39.603	Date Published: 09/04/2014
	Publication Name: <i>Athens Daily Review</i>
	Pollutants: organic compounds, nitrogen oxides, carbon monoxide, sulfur dioxide, sulfuric acid mist, particulate matter including particulate matter with diameters of 10 microns or less and 2.5 microns or less and hazardous air pollutants

Construction Permit Source Analysis & Technical Review

Permit No. 122733
Page 2

Regulated Entity No. RN107670341

Rule Citation	Requirement
	Date Affidavits/Copies Received: 09/17/2014
	Is bilingual notice required? No. An alternative language program exists; however, a Spanish newspaper or publication of general circulation could not be found in the area.
	Date Certification of Sign Posting / Application Availability Received: 04/02/2015
39.604	Public Comments Received? Yes
	Hearing Requested? Yes
	Meeting Request? Yes
	Date Response to Comments sent to OCC: See PN-2 responses below
	Consideration of Comments: See PN-2 responses below
	Is 2nd Public Notice required? Yes
39.419	Date 2nd Public Notice/Preliminary Decision Letter Mailed: 04/02/2015
39.413	Date County Judge, Mayor, and COG letters mailed: N/A
	Date Federal Land Manager letter mailed: N/A
39.605	Date affected states letter mailed: N/A
39.603	Date Published: April 15, 2015
	Publication Name: Athens Daily Review
	Pollutants: organic compounds, nitrogen oxides, carbon monoxide, sulfur dioxide, sulfuric acid mist, particulate matter including particulate matter with diameters of 10 microns or less and 2.5 microns or less and hazardous air pollutants
	Date Affidavits/Copies Received: 05/20//2015
	Is bilingual notice required? No
	Language: N/A
	Date Published: N/A
	Publication Name: N/A
	Date Affidavits/Copies Received: N/A
	Date Certification of Sign Posting / Application Availability Received: 05/20/2015
	Public Comments Received? Yes
	Meeting Request? Yes
	Date Meeting Held: April 23, 2015
	Hearing Request? Yes
	Date Hearing Held:
	Request(s) withdrawn? Four of six requests withdrawn, two remain.
	Date Withdrawn:

Construction Permit Source Analysis & Technical Review

Permit No. 122733
Page 3

Regulated Entity No. RN107670341

Rule Citation	Requirement
	Consideration of Comments:
39.421	Date RTC, Technical Review & Draft Permit Conditions sent to OCC: 08/20/2015
	Request for Reconsideration Received?
	Final Action:
	Are letters Enclosed?

Construction Permit & Amendment Requirements - 30 TAC Chapter 116 Rules

Rule Citation	Requirement
116.111(a)(2)(G)	Is the facility expected to perform as represented in the application? Yes
116.111(a)(2)(A)(i)	Are emissions from this facility expected to comply with all TCEQ air quality Rules & Regulations, and the intent of the Texas Clean Air Act? Yes
116.111(a)(2)(B)	Emissions will be measured using the following method: CEMS will be installed to measure turbine NO_x and CO emissions. There will be a fuel consumption CEMS to monitor emissions based on all other products of combustion, such as VOC, SO₂, and H₂SO₄. Records of diesel fuel, including sulfur content, will be used to monitor emissions based on emission calculations for the emergency engines.
	Comments on emission verification: None
116.111(a)(2)(D)	Subject to NSPS? Yes
	Subparts A, GG, IIII, & KKKK
116.111(a)(2)(E)	Subject to NESHAP? No
116.111(a)(2)(F)	Subject to NESHAP (MACT) for source categories? Yes
	Subparts A & ZZZZ
116.111(a)(2)(H)	Nonattainment review applicability: The facility is not located in a nonattainment area; therefore, nonattainment NSR review does not apply.
116.111(a)(2)(I)	PSD review applicability: The facility is not a "named source"; therefore, the PSD major source definition for criteria pollutants is 250 tpy. The facility does not meet or exceed that emission rate potential for any pollutants; therefore, PSD does not apply.
116.111(a)(2)(L)	Is Mass Emissions Cap and Trade applicable to the new or modified facilities? No If yes, did the proposed facility, group of facilities, or account obtain allowances to operate: N/A
116.140 - 141	Permit Fee: \$75,000 Fee certification: Rec No. R434274

Title V Applicability - 30 TAC Chapter 122 Rules

Rule Citation	Requirement
122.10(13)	Title V applicability: Because emissions from criteria pollutants will exceed 100 tpy, the site is subject to Title V and will need to submit an application for a federal operating permit under that program.
122.602	Periodic Monitoring (PM) applicability: Periodic monitoring is applicable because the site is a major source subject to 30 TAC Chapter 122. Periodic monitoring in the form of quarterly visible emissions/opacity observations; maintaining records showing the sulfur content of diesel fuel fired in the emergency generator and fire water pump and the hours of operation of these facilities; continuous monitoring of natural gas consumption for the CTGs; and continuous emissions monitoring of NO _x and CO for the CTGs are used to demonstrate compliance with the permit limits.

Construction Permit Source Analysis & Technical Review

Permit No. 122733
Page 4

Regulated Entity No. RN107670341

122.604 **Compliance Assurance Monitoring (CAM) applicability:**
The site has no control devices; therefore, CAM is not applicable.

Request for Comments

Received From	Program/Area Name	Reviewed By/Date	Comments
Region:	5 – Site review	Jason Sutherland 09/16/2014	Proceed with permit review (Site Review)
	5 – Draft Permit	Michelle Baetz, Gregg Orr/ 03/17/2015	Based on latest version (v3 from review with applicant) proceed with review
City:	Larue	N/A	
County:	Henderson	N/A	
ADMT:	ADMT	Reece Parker/ 03/09/2015	The AQA is acceptable for all review types and pollutants.
EB&T:	N/A		
Toxicology:	N/A		
Compliance:	N/A		
Legal:			
Comment resolution and/or unresolved issues:			

Process/Project Description

The project will consist of the construction and operation of two Combustion Turbines and associated emissions sources including a Firewater Pump, an Emergency Generator, two Diesel Storage Tanks, a Natural Gas-fired Heater, and Miscellaneous Maintenance Activities.

Combustion Turbines- Normal Operations

The combustion turbines combust natural gas to rotate a generator in order to produce electrical power. The main components of each combustion turbine are a compressor, combustor, turbine, and generator. The compressor pressurizes combustion air which is supplied to the combustor where the fuel is mixed with the combustion air and burned. The hot exhaust gases from the combustor enter the turbine where the gases expand across the turbine blades, driving the shaft to power the electric generator. The exhaust gases from the combustors will be sent to the respective stacks. In addition, there will be a natural gas-fired heater to heat the natural gas supply going to the combustion turbines.

The combustion turbines will be natural gas-fired and operated in simple cycle configuration, with a maximum total power generation capacity of approximately 386 MW to 464 MW. The combustion turbines that Halyard is proposing to install are either two GE 7FA.03 turbines (EPNs CTG.03-1 & CTG.03-2), two GE 7FA.05 turbines (EPNs CTG.05-1 & CTG.05-2), or two Siemens F5ee turbines (EPNs CTSF5-1 & CTSF5-2). These models have a maximum base-load gross electric power output of 193 MW to 232 MW per turbine. The combustion turbines will be equipped with Dry low NO_x (DLN) burners to control NO_x emissions. Halyard will select one of these three types of turbines and operate them up to 2,500 hrs/yr per turbine of Normal and Startup/Shutdown (SUSD) operation.

The combustion turbines will typically be operated at 100% load, with both turbines operating simultaneously. In order to meet the peak demands in power throughout the year, the combustion turbines will require frequent SUSDs. The details of the SUSDs and their durations are provided in the following section and in emission calculations in Appendix A of the application. Each turbine exhaust system will be equipped with a CEMS to monitor NO_x and CO.

Combustion Turbines- Maintenance, Startup, and Shutdown (MSS) Activities

Since the facility will be a peaker unit, electricity will be generated during hours of peak electricity demand all year long, necessitating frequent startups and shutdowns. A startup (SU) begins at first fire and ends when the turbine achieves approximately 50% load. A shutdown (SD) begins at the point the combustion turbine switches from combustion mode, or passes below approximately 50% load with the intent to shut down, until the end of combustion. Each SU and SD is limited to 60 minutes. Short-term start-up and shutdown emissions for the turbines are listed separately for each turbine

Construction Permit Source Analysis & Technical Review

Permit No. 122733
Page 5

Regulated Entity No. RN107670341

emission point.

Additionally, Halyard may perform the following maintenance activities at the proposed facility that are related to the Combustion Turbines:

- Turbine Washing,
- Fuel Gas Venting During Turbine MSS,
- Turbine Maintenance and Tuning, and
- DLN Burners Tuning.

These emissions are not anticipated to affect the annual emission limits.

Diesel Water Pump

The proposed facility will have a diesel-fired emergency fire water pump engine (EPN FWP-01). The maximum rating of the fire water pump engine will be 175 horsepower (hp). The engine will be limited to operating for 100 hours per year during non-emergency situations like maintenance and testing. The engine will be used solely for emergency situations apart from required maintenance and testing.

Diesel Emergency Generator

The facility will have a diesel-fired emergency generator (EPN EGEN-01) with a maximum rated output of 385 hp. The engine will be limited to operating for 100 hours per year during non-emergency situations like maintenance and testing. The engine will be used solely for emergency situations apart from required maintenance and testing.

Diesel Storage Tanks

The facility will have two diesel storage tanks (EPNs TK-01 and TK-02) (250-gallon and 500-gallon capacities respectively) to supply diesel to the fire water pump and emergency generator.

Natural Gas-Fired Heater

The site will have a single natural gas heater with two 4.5 million British thermal units per hour (MMBtu/hr) natural gas-fired burners exhausting to two stacks (EPNs HTR-01 and HTR-02). The heater will be used to heat the natural gas on an as-needed basis prior to its use as fuel for the combustion turbines to remove any condensed liquids that may damage the combustion sections of the turbines.

Fugitive Components

EPN FUG represents fugitive emissions from components in natural gas service, including components at the Metering Station and Natural Gas Pressure Regulator Station.

Miscellaneous Maintenance Activities

Miscellaneous maintenance activities will be performed periodically to ensure that the equipment operates in a manner that is safe, efficient, and environmentally sound. Miscellaneous maintenance-related activities with potential emissions are included with this application. These activities include the following:

- Air Intake Filter Maintenance,
- CEMS Calibration, and
- Inspection, repair, adjusting, testing and calibration of analytical equipment, and process instruments including sight glasses, meters, and gauges.

The emissions from these maintenance activities are represented by EPNs MMA1 and MMA2.

The above activities are based on engineering and operations knowledge available at this time. The actual maintenance activities performed at the site may have slight variations in procedure or equipment configuration.

Pollution Prevention, Sources, Controls and BACT- [30 TAC 116.111(a)(2)(C)]

In addition to a review of control technology for steady state operations, the best available control technology (BACT) analysis includes startup and shutdown emissions and the numerical emission limits in the permit reflect this analysis. Although the units may not meet the ppm by volume dry (ppmvd) limits during startup and shutdown, they will meet the mass emission limits (pounds per hour and tons per year) unless a separate limit was established, and startup and

Construction Permit Source Analysis & Technical Review

Permit No. 122733
Page 6

Regulated Entity No. RN107670341

shutdown events will be limited by Special Condition Nos. 10 and 11. Typical startup and shutdown of the turbine are conducted in accordance with manufacturer's recommendations to minimize emissions and maximize efficiencies.

As part of the BACT review process, the Texas Commission on Environmental Quality (TCEQ) evaluates information from the Environmental Protection Agency's (EPA's) RACT/BACT/LAER Clearinghouse (RBLC), on-going permitting in Texas and other states, and the TCEQ's continuing review of emissions control developments.

Combustion Turbine Generators (CTGs)

NO_x:

Each CTG is gas fired and equipped with DLN to control NO_x emissions to 9 ppmvd at 15% O₂ during steady state operations. DLN is a combustion zone technology that pre-mixes fuel and air to reduce thermal NO_x formation without the need for water or steam injection. Since the CTGs are each limited to 2500 hours per year of operation, based on a rolling 12-month period, installing a selective catalytic reduction unit (SCR) would not be economically reasonable. Recently issued permits in Texas for peaking turbines include Tradinghouse (issued 2/7/14), Guadalupe Power Partners (issued 10/2/2013) and DeCordova (8/29/2013). These permits have a NO_x concentration limit of 9 ppmvd at 15% O₂. Therefore, the use of DLN to control NO_x emissions to 9 ppmvd at 15% O₂ is consistent with recently issued permits for similar facilities and is BACT for the CTGs.

CO:

With DLN (designed to increase oxidation of CO to CO₂) and operating the CTGs according to good combustion practices, CO emissions will be controlled to 9 ppmvd at 15% O₂ during steady state operations for the turbines. Since the CTGs are restricted to the annual operating hours specified in the paragraph above for NO_x, installing an oxidation catalyst would not be economically reasonable. Recently issued peaking turbine permits in Texas have been issued at 9 ppmvd at 15% O₂. Therefore, the use of DLN and good combustion practices to control CO emissions to 9 ppmvd at 15% O₂ is consistent with recently issued permits for similar facilities and is BACT for the CTGs.

Volatile Organic Compounds (VOCs):

Similar to CO emissions generation, VOC emissions will result from the incomplete combustion of the natural gas. The primary factors influencing the generation of VOC emissions are temperature and fuel residence time within the combustion zone. According to the TCEQ's current combustion source BACT requirements, Tier I BACT for VOC emissions from gas-fired simple-cycle combustion turbines is 2 ppmvd at 15% O₂.

Halyard proposes to minimize VOC emissions from the proposed simple-cycle peaking units through the use of good combustion practices and burner design.

Through maintenance of optimum combustion conditions and practices and firing the CTGs with pipeline-quality natural gas, VOC emissions will be controlled to 1.4 ppmvd at 15% O₂ during steady state operations for the worst-case vendor guarantee for any of the three turbine options. This meets BACT.

Particulate Matter (PM/PM₁₀/PM_{2.5}):

In general, particulate matter (PM) is emitted from combustion processes as a result of inorganic constituents contained in the fuel, PM in the inlet air, and incomplete combustion of the organic constituents in the fuel. Because the combustion turbines will fire only natural gas, PM/PM₁₀/PM_{2.5} emissions are anticipated to be relatively low. Consistent with recent permits for simple cycle turbines, for which the TCEQ has determined that firing pipeline-quality natural gas is BACT for PM, Halyard will fire pipeline-quality natural gas and apply good combustion practices to minimize emissions of PM/PM₁₀/PM_{2.5} from the proposed units.

Halyard will demonstrate that BACT for PM/PM₁₀/PM_{2.5} is achieved through the initial stack testing and proper operation of the combustion turbines.

Sulfur Compounds (SO₂/H₂SO₄):

Emissions of SO₂ and H₂SO₄ from the CTGs will occur from the oxidation of sulfur in the natural gas during combustion, with the majority of the sulfur converted to SO₂ and a small fraction converting to H₂SO₄. The CTGs will be fired with pipeline-quality natural gas with a sulfur content not exceeding 5.0 grains total sulfur per 100 dry standard cubic feet (dscf) on an hourly basis, and 0.5 grains total sulfur per 100 dscf on an annual basis, which will minimize the formation of

Construction Permit Source Analysis & Technical Review

Permit No. 122733
Page 7

Regulated Entity No. RN107670341

SO₂ and H₂SO₄. This meets BACT.

Turbine Planned MSS:

During periods of planned MSS, control devices and process equipment are operated outside the optimal range they were designed to work most effectively, and it is technically infeasible to meet the primary BACT emission rates.

Therefore, secondary BACT limits are necessary during these periods to minimize emissions. BACT will be achieved by minimizing the duration of the MSS events (consistent with standard operating procedures) to minimize the amount of time the equipment is outside the optimal performance mode and meeting the emission limitations on the MAERT.

Also, planned MSS activities must be performed using good air pollution control practices and safe operating practices to minimize emissions.

Natural Gas Heater

A small 9.0 MMBtu/hr natural gas-fired gas line heater is also proposed. Given the nature and quantity of emissions, no control is BACT.

Emergency Engines

An emergency generator and a firewater pump are proposed. BACT for each unit will be achieved through the installation of an engine which meets the requirements of 40 CFR 60, Subpart IIII. The engines will fire ultra-low sulfur diesel fuel, containing no more than 15 parts per million (ppm) sulfur by weight. The firewater pump and the emergency generator are limited to 100 hours of non-emergency operation per year each.

Diesel Fuel Storage Tanks

Two tanks for the emergency diesel-fired engines with capacities less than 25 million gallons will be painted white and have submerged fill tubes to minimize VOC emissions. This represents BACT for the size and contents of the tanks.

Fugitive Emissions

The fugitive emissions include VOC from the natural gas fuel lines (EPN FUG). Given the nature and small quantity of the emissions, no control is BACT.

Lube Oil Vents and Miscellaneous Maintenance Activities

Although listed separately, these emission points represent sources associated with the normal operation of the turbines. Following the turbine manufacturer's operations and maintenance procedures will minimize emissions from those sources as well as the turbines' emissions, and is considered BACT.

Impacts Evaluation - 30 TAC 116.111(a)(2)(J)

Was modeling conducted?	Yes	Type of Modeling:	AERMOD	
Will GLC of any air contaminant cause violation of NAAQS?				No
Is this a sensitive location with respect to nuisance?				No
[\$116.111(a)(2)(A)(ii)] Is the site within 3000 feet of any school?				No
Additional site/land use information: The site is a "greenfield" location, with no other industrial facilities nearby.				

Summary of Modeling Results

The air quality analysis was acceptable for all review types and pollutants. The results are summarized below.

Construction Permit Source Analysis & Technical Review

Permit No. 122733
Page 8

Regulated Entity No. RN107670341

Table 1. Site-wide Modeling Results for State Property Line

Pollutant	Averaging Time	GLCmax ($\mu\text{g}/\text{m}^3$)	Standard ($\mu\text{g}/\text{m}^3$)
SO ₂	1-hr	0.9	1021
H ₂ SO ₄	1-hr	0.02	50
H ₂ SO ₄	24-hr	0.003	15

Table 2. Modeling Results for Minor NSR De Minimis

Pollutant	Averaging Time	GLCmax ($\mu\text{g}/\text{m}^3$)	De Minimis ($\mu\text{g}/\text{m}^3$)
SO ₂	1-hr	0.9	7.8
SO ₂	3-hr	0.7	25
SO ₂	24-hr	0.3	5
SO ₂	Annual	0.05	1
PM ₁₀	24-hr	1.1	5
PM _{2.5}	24-hr	1	1.2
PM _{2.5}	Annual	0.14	0.3
NO ₂	1-hr	7.3	7.5
NO ₂	Annual	0.3	1
CO	1-hr	705	2000
CO	8-hr	352	500

The 1-hr NO₂ GLC_{MAX} is the highest five-year average of the maximum predicted 1-hr concentrations determined for each receptor. The annual NO₂ GLC_{MAX} is the maximum predicted concentration associated with five years of meteorological data.

The GLC_{MAX} for all other pollutants and averaging times are the maximum predicted concentrations associated with one year of meteorological data.

The justification for selecting the EPA's interim 1-hr NO₂ and 1-hr SO₂ De Minimis levels was based on the assumptions underlying EPA's development of the 1-hr NO₂ and 1-hr SO₂ De Minimis levels. As explained in EPA guidance memoranda¹ the EPA believes it is reasonable as an interim approach to use a De Minimis level that represents 4% of the 1-hr NO₂ and 1-hr SO₂ NAAQS.

Halyard provided an evaluation of ambient PM_{2.5} monitoring data, consistent with EPA guidance for PM_{2.5}², for using the PM_{2.5} De Minimis levels. Background concentrations for PM_{2.5} were obtained from the EPA AIRS monitor 483491051 located at Corsicana Airport, Corsicana, Navarro County. The three-year average (2011-2013) of the 98th

¹ www.epa.gov/region07/air/nsr/nsrmemos/appwso2.pdf, www.epa.gov/nsr/documents/20100629no2guidance.pdf

² www.epa.gov/ttn/scram/guidance/guide/Guidance_for_PM25_Permit_Modeling.pdf

**Construction Permit
Source Analysis & Technical Review**

Permit No. 122733
Page 9

Regulated Entity No. RN107670341

percentile of the annual distribution of the 24-hr concentrations was used for the 24-hr value (21 µg/m³) and the three-year average (2011-2013) of the annual concentrations was used for the annual value (9 µg/m³). The use of this monitor is reasonable based on the applicants analysis of county-wide emissions, population, and emissions near the project and monitor sites.

Permit Concurrence and Related Authorization Actions

Is the applicant in agreement with special conditions?	Yes
Company representative(s):	Raghu Soule
Contacted Via:	Email
Date of contact:	02/26/2015
Other permit(s) or permits by rule affected by this action:	None
List permit and/or PBR number(s) and actions required or taken:	None

Project Reviewer	Date	Team Leader/Section Manager/Backup	Date
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TCEQ Interoffice Memorandum

To: Joe Janecka, P.E.
Combustion/Coatings Section

Thru: Daniel Menendez, Team Leader
Air Dispersion Modeling Team (ADMT)

From: Reece Parker and Dan Jamieson
ADMT

Date: March 9, 2015

Subject: **Air Quality Analysis Audit – Halyard Energy Henderson LLC (RN107670341)**

1. Project Identification Information

Permit Application Number: 122733
NSR Project Number: 216318
ADMT Project Number: 4469
NSRP Document Number: 525701
County: Henderson
ArcReader Published Map: [\\tceq4apmgisdata\GISWRK\APD\MODEL\PROJECTS\4469\4469.pmf](http://tceq4apmgisdata\GISWRK\APD\MODEL\PROJECTS\4469\4469.pmf)

Air Quality Analysis: Submitted by Trinity Consultants, November 2014, on behalf of Halyard Energy Henderson LLC. Additional information and modeling files were submitted January, February, and March 2015.

2. Report Summary

The air quality analysis is acceptable for all review types and pollutants. The results are summarized below.

A. Minor Source NSR Analysis

Table 1. Site-wide Modeling Results for State Property Line

Pollutant	Averaging Time	GLCmax ($\mu\text{g}/\text{m}^3$)	Standard ($\mu\text{g}/\text{m}^3$)
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TCEQ Interoffice Memorandum

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SO ₂	3-hr	0.7	25
SO ₂	24-hr	0.3	5
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PM ₁₀	24-hr	1.1	5
PM _{2.5}	24-hr	1	1.2
PM _{2.5}	Annual	0.14	0.3
NO ₂	1-hr	7.3	7.5
NO ₂	Annual	0.3	1
CO	1-hr	705	2000
CO	8-hr	352	500

The 1-hr NO₂ GLCmax is the highest five-year average of the maximum predicted 1-hr concentrations determined for each receptor. The annual NO₂ GLCmax is the maximum predicted concentration associated with five years of meteorological data.

The GLCmax for all other pollutants and averaging times are the maximum predicted concentrations associated with one year of meteorological data.

The justification for selecting the EPA's interim 1-hr NO₂ and 1-hr SO₂ De Minimis levels was based on the assumptions underlying EPA's development of the 1-hr NO₂ and 1-hr SO₂ De Minimis levels. As explained in EPA guidance memoranda^{1,2}, the EPA believes it is reasonable as an interim approach to use a De Minimis level that represents 4% of the 1-hr NO₂ and 1-hr SO₂ NAAQS.

¹ www.epa.gov/region07/air/nsr/nsrmemos/appwso2.pdf

TCEQ Interoffice Memorandum

The applicant provided an evaluation of ambient PM_{2.5} monitoring data, consistent with EPA guidance for PM_{2.5}³, for using the PM_{2.5} De Minimis levels. Background concentrations for PM_{2.5} were obtained from the EPA AIRS monitor 483491051 located at Corsicana Airport, Corsicana, Navarro County. The three-year average (2011-2013) of the 98th percentile of the annual distribution of the 24-hr concentrations was used for the 24-hr value (21 µg/m³) and the three-year average (2011-2013) of the annual concentrations was used for the annual value (9 µg/m³). The use of this monitor is reasonable based on the applicants analysis of county-wide emissions, population, and emissions near the project and monitor sites.

3. Model Used and Modeling Techniques

AERMOD (Version 14134) was used in a refined screening mode.

The proposed project consists of two turbines. Three different turbine models with two different configurations for each model are being considered for the proposed site: the General Electric 7FA.03 Option 1, the General Electric 7FA.03 Option 2, the General Electric 7FA.05 Option 1, the General Electric 7FA.05 Option 2, the SiemensF5ee Option 1, and the SiemensF5ee Option 2. To determine the worst-case operating scenario, each of the proposed turbine model/configuration options was modeled. The results presented above represent the results from the worst-case scenario.

The applicant also modeled emissions associated with the turbines undergoing startup/shutdown (SUSD) operations.

A. Land Use

Medium roughness and elevated terrain were used in the modeling analysis. These selections are consistent with the AERSURFACE analysis, topographic map, DEMs, and aerial photography. The selection of medium roughness is reasonable.

B. Meteorological Data

Surface Station and ID: Corsicana, TX (Station #: 53912)
Upper Air Station and ID: Shreveport, LA (Station #: 13957)
Meteorological Dataset: 2008-2012 for NO₂; 2012 for all other pollutants
Profile Base Elevation: 136 meters

² www.epa.gov/nsr/documents/20100629no2guidance.pdf

³ www.epa.gov/ttn/scram/guidance/guide/Guidance_for_PM25_Permit_Modeling.pdf

TCEQ Interoffice Memorandum

C. Receptor Grid

The grid modeled was sufficient in density and spatial coverage to capture representative maximum ground-level concentrations.

D. Building Wake Effects (Downwash)

Input data to Building Profile Input Program Prime (Version 04274) are consistent with the plot plan and modeling report.

4. Modeling Emissions Inventory

The modeled emission point and area source parameters and rates were consistent with the modeling report. The source characterizations used to represent the sources were appropriate.

The emergency generator and firewater pump engines were evaluated following EPA guidance on intermittent emissions for the 1-hr NO₂ NAAQS analysis. According to the applicant, each engine is tested no more than 100 hours per year, and on the same day. Annual average emission rates were used for the 1-hr NO₂ NAAQS modeling based on 100 operational hours per year.

For the PM₁₀/PM_{2.5} NAAQS analyses, the modeled emission rates were based on the duration of operations within a 24-hr period:

- The modeled emission rates of the emergency generator and firewater pump engines were based on the duration of testing the engines in a 24-hr period (one hour).
- The SUSD emissions of the turbines were modeled using emission rates based on six hours of operation per day.
- The modeled emission rates for other MSS activities (turbine washing, turbine filter change-out, and dust hopper dumping) were based on the duration of the activities in a 24-hr period (one hour for each activity).

NO_x to NO₂ conversion factors of 0.75 and 0.8 were applied to the modeled annual and 1-hr NO_x emission rates, respectively, which is consistent with guidance for combustion sources.

TCEQ Interoffice Memorandum

Except for SO₂ and the items noted above, maximum allowable hourly emission rates were used for the short-term averaging time analyses, and annual average emission rates were used for the annual averaging time analyses. For SO₂, maximum allowable hourly emission rates were used for the short-term and annual averaging time analyses.



Compliance History Report

PUBLISHED Compliance History Report for CN604656827, RN107670341, Rating Year 2014 which includes Compliance History (CH) components from September 1, 2009, through August 31, 2014.

Customer, Respondent, or Owner/Operator:	CN604656827, Halyard Energy Henderson, LLC	Classification: UNCLASSIFIED	Rating: -----
Regulated Entity:	RN107670341, HALYARD HENDERSON ENERGY CENTER	Classification: UNCLASSIFIED	Rating: -----
Complexity Points:	5	Repeat Violator: NO	
CH Group:	06 - Electric Power Generation		
Location:	FROM THE INTERSECTION OF TEXAS FARM TO MARKET 2588 AND COUNTY ROAD 4402 DRIVE 0.3 MILES WEST ON COUNTY ROAD 4402 AND THE SITE WILL BE ON THE RIGHT HENDERSON, TX		
TCEQ Region:	REGION 05 - TYLER		
ID Number(s):			
AIR NEW SOURCE PERMITS	PERMIT 122733		

Compliance History Period: September 01, 2009 to August 31, 2014 **Rating Year:** 2014 **Rating Date:** 09/01/2014

Date Compliance History Report Prepared: October 15, 2015

Agency Decision Requiring Compliance History: Permit - Issuance, renewal, amendment, modification, denial, suspension, or revocation of a permit.

Component Period Selected: September 01, 2009 to August 31, 2014

TCEQ Staff Member to Contact for Additional Information Regarding This Compliance History.

Name: TCEQ Staff Member

Phone: (512) 239-1353

Site and Owner/Operator History:

- 1) Has the site been in existence and/or operation for the full five year compliance period? NO
- 2) Has there been a (known) change in ownership/operator of the site during the compliance period? NO
- 3) If **YES** for #2, who is the current owner/operator? N/A
- 4) If **YES** for #2, who was/were the prior owner(s)/operator(s)? N/A
- 5) If **YES**, when did the change(s) in owner or operator occur? N/A

Components (Multimedia) for the Site Are Listed in Sections A - J

A. Final Orders, court judgments, and consent decrees:

N/A

B. Criminal convictions:

N/A

C. Chronic excessive emissions events:

N/A

D. The approval dates of investigations (CCEDS Inv. Track. No.):

N/A

E. Written notices of violations (NOV) (CCEDS Inv. Track. No.):

A notice of violation represents a written allegation of a violation of a specific regulatory requirement from the commission to a regulated entity. A notice of violation is not a final enforcement action, nor proof that a violation has actually occurred.

N/A

F. Environmental audits:

N/A

G. Type of environmental management systems (EMSs):

N/A

H. Voluntary on-site compliance assessment dates:

N/A

I. Participation in a voluntary pollution reduction program:

N/A

J. Early compliance:

N/A

Sites Outside of Texas:

N/A