

From: [Gil Diekhoff](#)
To: [Princess Ohiagu](#)
Subject: RE: Technical Review -- FOP 01333/Project 36429, Solar Turbines Incorporated/Dallas Overhaul Center
Date: Wednesday, June 5, 2024 3:12:32 PM

Hi Princess,

Unless I'm mistaken, I believe no action is needed at this time.

We already provided a copy to the EPA and all other items seem to be non-issues for now.

Please let me know if there is any required action at this time. If not, I'll use you as the main contact going forward for any changes or required actions.

Thanks for reaching out and look forward to working with you.

Regards,

Gil Diekhoff BS. MS. CSP.
EHS Manager
Solar Turbines Inc.
DeSoto, Texas
(972) 228-6157
Diekhoff_Gil_P@solarturbines.com

Caterpillar: Confidential Green

From: Princess Ohiagu <Princess.Ohiagu@tceq.texas.gov>
Sent: Wednesday, June 5, 2024 11:49 AM
To: Gil Diekhoff <Diekhoff_Gil_P@solarturbines.com>
Subject: Technical Review -- FOP 01333/Project 36429, Solar Turbines Incorporated/Dallas Overhaul Center

CAUTION: EXTERNAL EMAIL

This is a message from Princess.Ohiagu@tceq.texas.gov.
Use caution when opening unexpected emails and do not click on links or
attachments from unknown senders.
For more resources, visit security.cat.com/phishing.

Good afternoon,

I have been assigned to the Federal Operating Permit (FOP) revision application of Permit

No. O1333 for Solar Turbines Incorporated, Dallas Overhaul Center. This application has been assigned Project No. 36429. Please address all correspondence pertaining to this permit application, including any updates, to me at the address below, and use both the Permit and Project reference numbers above to facilitate tracking.

In addition, I wanted to let you know that EPA has, on occasion, objected to Title V permits based on the following:

- a. NSR permit and PBR monitoring sufficiency –please refer to our periodic monitoring guidance for reference of monitoring that EPA has, so far, considered sufficient.
- b. Reference to confidential business information (CBI) in NSR permits and PBR submittals.
- c. High level terms in the SOP Applicable Requirement Summary Table. The high level terms are sometimes used in SOPs when unit attribute forms have not yet been updated due to regulatory amendments.
- d. Accuracy of PBR information provided on the supplemental table and in the permit – please refer to Forms OP-PBRSUP and OP-REQ1 Instructions.

If you have any questions or concerns on any of these items or think you need to do any additional updates, let me know and we can discuss further.

Application updates may now be submitted through Title V STEERS. Any application updates that are submitted by the RO/DAR through STEERS are certified and do not require the submittal of an original signature OP-CRO1. Application updates that are provided through email or physical mail require certification using an original signature OP-CRO1.

Please notify me when these updates have been submitted.

As required on Form OP-1, question IV.D, please remember the FOP application and all application updates must be submitted to EPA Region 6 at R6AirPermitsTX@epa.gov and to the TCEQ regional office having jurisdiction. This submittal information can be found on our website at [Where to Submit FOP Applications and Permit-Related Documents](#).

Please review the “SOP Technical Review Fact Sheet” located at http://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title_V/sop_wdp_factsheet.pdf. This guidance contains important information regarding the review process and application update procedures. Contact me if you have any questions regarding the guidelines, the project schedule, or any other details regarding your application or permit.

Thank you for your cooperation.

Sincerely,

Princess Ohiagu
Operating Permits

Air Permits Division

Texas Commission on Environmental Quality

512 239-2048

Princess.ohiagu@tceq.texas.gov



How are we doing? Fill out our online customer satisfaction survey
at www.tceq.texas.gov/customersurvey

From: [Stuart L. Keil, P.E.](#)
To: [Princess Ohiagu](#)
Cc: [Kimberli Fowler](#); [EPA Region 6](#); [Gil Diekhoff](#); [JASON THOMAS](#); [Kaytlyn Collins](#); [Stuart Keil, P.E.](#)
Subject: Re: Fw: Working Draft Permit -- FOP O1333/Project 36429, Solar Turbines Incorporated/Dallas Overhaul Center
Date: Thursday, January 23, 2025 3:07:53 PM
Attachments: [~WRD0000.jpg](#)
[op-2 012325.docx](#)

Princess, on behalf of Solar Turbines Incorporated, attached is the updated Form OP-2 that you requested.

Please let us know if you need anything more in these matters.

Stuart L. Keil, P.E.
Keil Environmental, Inc.
413 Honeycomb Ridge
Austin, TX 78746
(512) 306-9983 phone
(512) 517-6718 cell

From: Princess Ohiagu <Princess.Ohiagu@tceq.texas.gov>
Sent: Thursday, January 23, 2025 10:55 AM
To: Stuart L. Keil, P.E. <keil@flash.net>
Cc: Kimberli Fowler <kimberli.fowler@tceq.texas.gov>; EPA Region 6 <R6AirPermitsTX@epa.gov>; Gil Diekhoff <Diekhoff_Gil_P@solarturbines.com>; JASON THOMAS <JASON.THOMAS2@solarturbines.com>; Kaytlyn Collins <Kaytlyn.Collins@solarturbines.com>; Stuart Keil, P.E. <stuartlkeil@gmail.com>
Subject: RE: Fw: Working Draft Permit -- FOP O1333/Project 36429, Solar Turbines Incorporated/Dallas Overhaul Center

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Good morning,

For us to complete this review, please the following documentation by the end of business today.

Princess Ohiagu

Operating Permits

Air Permits Division

Texas Commission on Environmental Quality

512 239-2048

Princess.ohiagu@tceq.texas.gov



How are we doing? Fill out our online customer satisfaction survey
at www.tceq.texas.gov/customersurvey

From: Princess Ohiagu
Sent: Friday, January 17, 2025 2:54 PM
To: Stuart L. Keil, P.E. <keil@flash.net>
Cc: Kimberli Fowler <Kimberli.Fowler@tceq.texas.gov>; EPA Region 6 <R6AirPermitsTX@epa.gov>; Gil Diekhoff <Diekhoff_Gil_P@solarturbines.com>; JASON THOMAS <JASON.THOMAS2@solarturbines.com>; Kaytlyn Collins <Kaytlyn.Collins@solarturbines.com>; Stuart Keil, P.E. <stuartlkeil@gmail.com>
Subject: RE: Fw: Working Draft Permit -- FOP O1333/Project 36429, Solar Turbines Incorporated/Dallas Overhaul Center

Thank you for your response.

Please provide an updated OP-2 with the correct information due by Wednesday January 22, 2025.

Princess Ohiagu

Operating Permits

Air Permits Division

Texas Commission on Environmental Quality

512 239-2048

Princess.ohiagu@tceq.texas.gov



How are we doing? Fill out our online customer satisfaction survey
at www.tceq.texas.gov/customersurvey

From: Stuart L. Keil, P.E. <keil@flash.net> ,
Sent: Friday, January 17, 2025 11:03 AM
To: Princess Ohiagu <Princess.Ohiagu@tceq.texas.gov>
Cc: Kimberli Fowler <kimberli.fowler@tceq.texas.gov>; EPA Region 6 <R6AirPermitsTX@epa.gov>; Gil Diekhoff <Diekhoff_Gil_P@solarturbines.com>; JASON THOMAS <JASON.THOMAS2@solarturbines.com>; Kaytlyn Collins

<Kaytlyn.Collins@solarturbines.com>; Stuart Keil. P.E. <stuartlkeil@gmail.com>

Subject: Re: Fw: Working Draft Permit -- FOP O1333/Project 36429, Solar Turbines Incorporated/Dallas Overhaul Center

Princess, my apologies. After further research, I found that on October 7, 2022, the EPA reclassified the DFW area from serious to severe nonattainment for the 0.075 ppm 2008 ozone standard.

Therefore, with a severe nonattainment designation and a major source threshold of 25 tons/yr, the DeSoto site is indeed a major source for VOC.

Sorry for the confusion.

On 1/17/2025 10:02 AM, Stuart L. Keil, P.E. wrote:

Princess, you are correct. The DeSoto site is major for NOx, but not major for VOC.

As a reminder, on June 20, 2024, the EPA reclassified the nine-county DFW area from moderate to serious nonattainment, effective July 22, 2024. The serious nonattainment designation has a 50 tons/yr major source threshold. Since DeSoto's VOC emissions are less than 40 tons/yr, the site is not major for VOC.

Hope this helps and let us know if you need anything more.

From: **Princess Ohiagu** <Princess.Ohiagu@tceq.texas.gov>

Date: Thu, Jan 16, 2025 at 1:51 PM

Subject: RE: Fw: Working Draft Permit -- FOP O1333/Project 36429, Solar Turbines Incorporated/Dallas Overhaul Center

To: Stuart L. Keil, P.E. <keil@flash.net>

Cc: Kimberli Fowler <kimberli.fowler@tceq.texas.gov>, EPA Region 6 <R6AirPermitsTX@epa.gov>, Gil Diekhoff <Diekhoff_Gil_P@solarturbines.com>, JASON THOMAS <JASON.THOMAS2@solarturbines.com>, Kaytlyn Collins <Kaytlyn.Collins@solarturbines.com>, Stuart Keil. P.E. <stuartlkeil@gmail.com>

Good afternoon,

Please confirm whether the site is major for NOX and VOC, the submitted OP-2 indicates NOX only.

Princess Ohiagu

Operating Permits

Air Permits Division

Texas Commission on Environmental Quality

512 239-2048

Princess.ohiagu@tceq.texas.gov



How are we doing? Fill out our online customer satisfaction survey at www.tceq.texas.gov/customerurvey

From: Stuart L. Keil, P.E. <keil@flash.net>
Sent: Friday, November 15, 2024 10:38 AM
To: Princess Ohiagu <Princess.Ohiagu@tceq.texas.gov>
Cc: Kimberli Fowler <kimberli.fowler@tceq.texas.gov>; EPA Region 6 <R6AirPermitsTX@EPA.gov>; Gil Diekhoff <Diekhoff_Gil_P@solarturbines.com>; JASON THOMAS <JASON.THOMAS2@solarturbines.com>; Kaytlyn Collins <Kaytlyn.Collins@solarturbines.com>; Stuart Keil, P.E. <stuartlkeil@gmail.com>
Subject: Re: Fw: Working Draft Permit -- FOP O1333/Project 36429, Solar Turbines Incorporated/Dallas Overhaul Center

Princess, thanks for the opportunity to review the draft Title V permit for the referenced project.

Solar Turbines accepts the draft permit as proposed. However, it is our understanding that this permit needs to include in its appendix a copy of the NSR permit issued on 2/23/24.

Please let us know when you are ready to initiate the public announcement and we will provide the required OP-CRO1.

Thanks for your help in these matters.

Stuart L. Keil, P.E.
Keil Environmental, Inc.
413 Honeycomb Ridge
Austin, TX 78746
(512) 306-9983 phone
(512) 517-6718 cell

From: Princess Ohiagu <Princess.Ohiagu@tceq.texas.gov>
Sent: Thursday, October 31, 2024 4:35:47 PM
To: Gil Diekhoff <Diekhoff_Gil_P@solarturbines.com>
Subject: Working Draft Permit -- FOP O1333/Project 36429, Solar Turbines Incorporated/Dallas Overhaul Center

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Good afternoon,

I have conducted a technical review of *revision* application for *Solar Turbines Incorporated, Dallas Overhaul Center*. An electronic copy of the Working Draft Permit (WDP) is attached for your review. This WDP

contains the TCEQ determination of applicable requirements based on the information submitted in your application, and any updates provided.

The following changes were made to the permit:

- *Revised and updated the Major NSR Summary Table to incorporate the minor changes to the table and the effective issuance date of 02/23/2024.*

Please review the WDP and submit to me any comments you have on the working draft permit by **November 15, 2024**. *Any comments outside the scope of the most recent changes should be submitted as a separate project.*

Please review the second portion of the “SOP Technical Review Fact Sheet” located at http://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title_V/sop_wdp_factsheet.pdf. This guidance contains important information regarding WDP review and comment procedures.

Note that a Certification by Responsible Official (Form OP-CRO1) for any uncertified application information, including application updates supporting the WDP comments, is required. After final review of the WDP, additional changes supported by application updates may require certification. I will advise you of these changes at a later date. Prior to transmittal of the Public Notice/Announcement Authorization Package, a duly signed OP-CRO1 form may be required which includes the specific dates or time-period of all submitted application documentation that was not previously certified. I will advise you of this requirement prior to sending the Public Notice/Announcement Authorization.

Application updates may now be submitted through Title V STEERS. Any application updates that are submitted by the RO/DAR through STEERS are certified and do not require the submittal of an original signature OP-CRO1. Application updates that are provided through email or physical mail require certification using an original signature OP-CRO1.

Please notify me when these updates have been submitted.

As required on Form OP-1, question IV.D, please remember the FOP application and all application updates must be submitted to EPA Region 6 at R6AirPermitsTX@epa.gov and to the TCEQ regional office having jurisdiction. This submittal information can be found on our website at [Where to Submit FOP Applications and Permit-Related Documents](#).

Contact me if you have any questions regarding the guidelines, the project schedule, or any other details regarding your application or

permit.

Thank you for your cooperation.

Sincerely,

Princess Ohiagu

Operating Permits

Air Permits Division

Texas Commission on Environmental Quality

512 239-2048

Princess.ohiagu@tceq.texas.gov



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Caterpillar: Confidential Green

From: Gil Diekhoff <Diekhoff_Gil_P@solarturbines.com>

Sent: Wednesday, June 5, 2024 3:12 PM

To: Princess Ohiagu <Princess.Ohiagu@tceq.texas.gov>

Subject: RE: Technical Review -- FOP O1333/Project 36429, Solar
Turbines Incorporated/Dallas Overhaul Center

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Please let me know if there is any required action at this time. If not, I'll
use you as the main contact going forward for any changes or required
actions.

Thanks for reaching out and look forward to working with you.

Regards,

Gil Diekhoff BS. MS. CSP.

EHS Manager

Solar Turbines Inc.

DeSoto, Texas

(972) 228-6157

Diekhoff_Gil_P@solarturbines.com

Caterpillar: Confidential Green

From: Princess Ohiagu <Princess.Ohiagu@tceq.texas.gov>

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Good afternoon,

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In addition, I wanted to let you know that EPA has, on occasion, objected to Title V permits based on the following:

- a. NSR permit and PBR monitoring sufficiency –please refer to our periodic monitoring guidance for reference of monitoring that EPA has, so far, considered sufficient.
- b. Reference to confidential business information (CBI) in NSR permits and PBR submittals.

- c. High level terms in the SOP Applicable Requirement Summary Table. The high level terms are sometimes used in SOPs when unit attribute forms have not yet been updated due to regulatory amendments.
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Thank you for your cooperation.

Sincerely,

Princess Ohiagu

Operating Permits

Air Permits Division

Texas Commission on Environmental Quality

512 239-2048

Princess.ohiagu@tceq.texas.gov



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**Federal Operating Permit Program
Application for Permit Revision/Renewal
Form OP-2-Table 1
Texas Commission on Environmental Quality**

Date: 01/23/2025	
Permit No.: O1333	
Regulated Entity No.: RN100219963	
Company Name: Solar Turbines Incorporated	
For Submissions to EPA	
Has an electronic copy of this application been submitted (or is being submitted) to EPA? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	
I. Application Type	
Indicate the type of application:	
<input type="checkbox"/> Renewal	
<input checked="" type="checkbox"/> Streamlined Revision (Must include provisional terms and conditions as explained in the instructions.)	
<input type="checkbox"/> Significant Revision	
<input type="checkbox"/> Revision Requesting Prior Approval	
<input type="checkbox"/> Administrative Revision	
<input type="checkbox"/> Response to Reopening	
II. Qualification Statement	
For SOP Revisions Only <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	
For GOP Revisions Only <input type="checkbox"/> YES <input type="checkbox"/> NO	

**Federal Operating Permit Program
Application for Permit Revision/Renewal
Form OP-2-Table 1 (continued)
Texas Commission on Environmental Quality**

III. Major Source Pollutants (Complete this section if the permit revision is due to a change at the site or change in regulations.)

Indicate all pollutants for which the site is a major source based on the site's potential to emit:
(Check the appropriate box[es].)

☒ VOC ☒ NO_x ☐ SO₂ ☐ PM₁₀ ☐ CO ☐ Pb ☐ HAP

Other:

IV. Reference Only Requirements (For reference only)

Has the applicant paid emissions fees for the most recent agency fiscal year (September 1 - August 31)? ☒ YES ☐ NO ☐ N/A

V. Delinquent Fees and Penalties

Notice: This form will not be processed until all delinquent fees and/or penalties owed to the TCEQ or the Office of the Attorney General on behalf of the TCEQ are paid in accordance with the Delinquent Fee and penalty protocol.

**Federal Operating Permit Program
Application for Permit Revision/Renewal
Form OP-2-Table 2
Texas Commission on Environmental Quality**

Date: 01/23/2025
Permit No.: O1333
Regulated Entity No.: RN100219963
Company Name: Solar Turbines Incorporated

Using the table below, provide a description of the revision.

Revision No.	Revision Code		Unit/Group	Process	NSR Authorization	Description of Change and Provisional Terms and Conditions
		New Unit	ID No.	Applicable Form		
1	MS-A	NO	TC7	Major NSR Summary Table	20041, N196M1, PSDTX1590	Regarding the required offsets for Test Cell No. 7, Solar Turbines Incorporated was issued an NSR permit alteration on 2/23/2024 to identify the most recent EBT-approved credits by their TCEQ credit certificate numbers. This alteration creates the need to update the Major NSR Summary Table attached to the Title V permit, the accompanying copy of the federal nonattainment and PSD permit, and the permit issuance date on the Title V permit's NSR Authorization References Table.

From: Johnny Bowers
Sent: Friday, March 8, 2024 9:07 AM
To: Miguel Gallegos
Subject: FW: STEERS Title V Application Submittal (New Application)

Please process. Thanks!

-----Original Message-----

From: steers@tceq.texas.gov <steers@tceq.texas.gov>
Sent: Thursday, March 7, 2024 11:31 AM
To: RFCAIR4 <RFCAIR4@tceq.texas.gov>; TVAPPS <tvapps@tceq.texas.gov>
Subject: STEERS Title V Application Submittal (New Application)

The TV-E application has been successfully submitted by ADAM NAMMARI. The submittal was received at 03/07/2024 11:31 AM.

The Reference number for this submittal is 600670

The confirmation number for this submittal is 527750.

The Area ID for this submittal is 1333.

The Project ID for this submittal is 36429.

The hash code for this submittal is CC46AEFADD63AE2C3C3DD0CE1AE93B071AE7868563A53A3C001DFBE49D4838F2.

You may access the original application submittal and the notice of final action documents from the COR Viewer which is available at <https://ida.tceq.texas.gov/steersstaff/index.cfm?fuseaction=openadmin.submitlog&newsearch=yes>.

If you have any questions, please contact the STEERS Help Line at 512-239-6925 or by e-mail at steers@tceq.texas.gov.

**Federal Operating Permit Program
Application for Permit Revision/Renewal
Form OP-2-Table 1
Texas Commission on Environmental Quality**

Date: 03/07/2024	
Permit No.: O1333	
Regulated Entity No.: RN100219963	
Company Name: Solar Turbines Incorporated	
For Submissions to EPA	
Has an electronic copy of this application been submitted (or is being submitted) to EPA? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	
I. Application Type	
Indicate the type of application:	
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<input checked="" type="checkbox"/> Streamlined Revision (Must include provisional terms and conditions as explained in the instructions.)	
<input type="checkbox"/> Significant Revision	
<input type="checkbox"/> Revision Requesting Prior Approval	
<input type="checkbox"/> Administrative Revision	
<input type="checkbox"/> Response to Reopening	
II. Qualification Statement	
For SOP Revisions Only <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	
For GOP Revisions Only <input type="checkbox"/> YES <input type="checkbox"/> NO	

**Federal Operating Permit Program
Application for Permit Revision/Renewal
Form OP-2-Table 1 (continued)
Texas Commission on Environmental Quality**

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Indicate all pollutants for which the site is a major source based on the site's potential to emit:
(Check the appropriate box[es].)

☐ VOC ☒ NO_x ☐ SO₂ ☐ PM₁₀ ☐ CO ☐ Pb ☐ HAP

Other:

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**Federal Operating Permit Program
Application for Permit Revision/Renewal
Form OP-2-Table 2
Texas Commission on Environmental Quality**

Date: 03/07/2024
Permit No.: O1333
Regulated Entity No.: RN100219963
Company Name: Solar Turbines Incorporated

Using the table below, provide a description of the revision.

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Major NSR Summary Table

Permit Numbers: 20041 and N196M1 and PSDTX1590					Issuance Date:		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lbs/hour	TPY (4)	Special Conditions/ Application Information	Special Conditions/ Application Information	Special Conditions/ Application Information
TC1	Test Cell 1 Gas fuel firing	NO _x	106.9	---	2, 3, 9	9, 10	
		CO	84.8	---			
		VOC	46.6	---			
		PM	5.3	---			
		PM ₁₀	5.3	---			
		PM _{2.5}	5.3	---			
		SO ₂	2.0	---			
TC1	Test Cell 1 Liquid fuel firing	NO _x	181.5	---	2, 3, 9	9, 10	
		CO	88.8	---			
		VOC	20.4	---			
		PM	15.7	---			
		PM ₁₀	15.7	---			
		PM _{2.5}	15.7	---			
		SO ₂	7.5	---			
TC1	Test Cell 1 - Annual Emission Rate Gas and Liquid Fuel Firing	NO _x	---	100.2	2, 3, 9	9, 10	14
		CO	---	27.7			
		VOC	---	9.4			
		PM	---	10.7			
		PM ₁₀	---	10.7			
		PM _{2.5}	---	10.7			
		SO ₂	---	2.9			

Major NSR Summary Table

Permit Numbers: 20041 and N196M1 and PSDTX1590					Issuance Date:		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lbs/hour	TPY (4)	Special Conditions/ Application Information	Special Conditions/ Application Information	Special Conditions/ Application Information
TC2	Test Cell 2 Gas Fuel Firing	NO _x	8.7	---	2, 3, 9	9, 10	
		CO	18.4	---			
		VOC	4.7	---			
		PM	0.7	---			
		PM ₁₀	0.7	---			
		PM _{2.5}	0.7	---			
		SO ₂	0.4	---			
TC2	Test Cell 2 Liquid Fuel Firing	NO _x	13.0	---	2, 3, 9	9, 10	
		CO	37.0	---			
		VOC	4.7	---			
		PM	3.5	---			
		PM ₁₀	3.5	---			
		PM _{2.5}	3.5	---			
		SO ₂	1.5	---			
TC2	Test Cell 2 – Annual Emission Rates Gas and Liquid Fuel Firing	NO _x	---	8.7	2, 3, 9	9, 10	14
		CO	---	9.2			
		VOC	---	0.9			
		PM	---	1.9			
		PM ₁₀	---	1.9			
		PM _{2.5}	---	1.9			
		SO ₂	---	0.8			

Major NSR Summary Table

Permit Numbers: 20041 and N196M1 and PSDTX1590					Issuance Date:		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lbs/hour	TPY (4)	Special Conditions/ Application Information	Special Conditions/ Application Information	Special Conditions/ Application Information
TC3	Test Cell 3 Gas Fuel Firing	NO _x	80.0	---	2, 3, 9	9, 10	
		CO	84.8	---			
		VOC	13.5	---			
		PM	2.5	---			
		PM ₁₀	2.5	---			
		PM _{2.5}	2.5	---			
		SO ₂	1.1	---			
TC3	Test Cell 3 Liquid Fuel Firing	NO _x	120.0	---	2, 3, 9	9, 10	
		CO	45.6	---			
		VOC	7.2	---			
		PM	15.7	---			
		PM ₁₀	15.7	---			
		PM _{2.5}	15.7	---			
		SO ₂	4.8	---			
TC3	Test Cell 3 – Annual Emission Rates Gas and Liquid Fuel Firing	NO _x	---	35.9	2, 3, 9	9, 10	14
		CO	---	19.4			
		VOC	---	1.8			
		PM	---	10.7			
		PM ₁₀	---	10.7			
		PM _{2.5}	---	10.7			
		SO ₂	---	2.7			

Major NSR Summary Table

Permit Numbers: 20041 and N196M1 and PSDTX1590					Issuance Date:		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lbs/hour	TPY (4)	Special Conditions/ Application Information	Special Conditions/ Application Information	Special Conditions/ Application Information
TC4	Test Cell 4 Gas Fuel Firing	NO _x	106.9	---	2, 3, 9	9, 10	
		CO	84.8	---			
		VOC	46.6	---			
		PM	5.3	---			
		PM ₁₀	5.3	---			
		PM _{2.5}	5.3	---			
		SO ₂	2.0	---			
TC4	Test Cell 4 Liquid Fuel Firing	NO _x	181.5	---	2, 3, 9	9, 10	
		CO	41.3	---			
		VOC	14.3	---			
		PM	15.7	---			
		PM ₁₀	15.7	---			
		PM _{2.5}	15.7	---			
		SO ₂	7.5	---			
TC4	Test Cell 4 – Annual Emission Rates Gas and Liquid Fuel Firing	NO _x	---	100.2	2, 3, 9	9, 10	14
		CO	---	27.7			
		VOC	---	9.4			
		PM	---	10.7			
		PM ₁₀	---	10.7			
		PM _{2.5}	---	10.7			
		SO ₂	---	2.9			

Major NSR Summary Table

Permit Numbers: 20041 and N196M1 and PSDTX1590					Issuance Date:		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lbs/hour	TPY (4)	Special Conditions/ Application Information	Special Conditions/ Application Information	Special Conditions/ Application Information
TC5	Test Cell 5 Gas Fuel Firing	NO _x	192.8	---	2, 3, 9	9, 10	
		CO	30.0	---			
		VOC	8.8	---			
		PM	8.5	---			
		PM ₁₀	8.5	---			
		PM _{2.5}	8.5	---			
		SO ₂	3.8	---			
TC5	Test Cell 5 Liquid Fuel Firing	NO _x	338.8	---	2, 3, 9	9, 10	
		CO	30.0	---			
		VOC	8.8	---			
		PM	12.1	---			
		PM ₁₀	12.1	---			
		PM _{2.5}	12.1	---			
		SO ₂	14.1	---			
TC5	Test Cell 5 – Annual Emission Rates Gas and Liquid Fuel Firing	NO _x	---	74.53	2, 3, 9	9, 10	14
		CO	---	25.48			
		VOC	---	5.81			
		PM	---	7.49			
		PM ₁₀	---	7.49			
		PM _{2.5}	---	7.49			
		SO ₂	---	4.15			

Major NSR Summary Table

Permit Numbers: 20041 and N196M1 and PSDTX1590					Issuance Date:		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lbs/hour	TPY (4)	Special Conditions/ Application Information	Special Conditions/ Application Information	Special Conditions/ Application Information
TC6	Test Cell 6 Gas Fuel Firing	NO _x	298.43	---	2, 3, 9	9, 10	
		CO	26.00	---			
		VOC	1.49	---			
		PM	4.21	---			
		PM ₁₀	4.21	---			
		PM _{2.5}	4.21	---			
		SO ₂	3.04	---			
TC6	Test Cell 6 Liquid Fuel Firing	NO _x	409.53	---	2, 3, 9	9, 10	
		CO	26.29	---			
		VOC	7.50	---			
		PM	13.60	---			
		PM ₁₀	13.60	---			
		PM _{2.5}	13.60	---			
		SO ₂	0.35	---			
TC6	Test Cell 6 – Annual Emission Rates Gas and Liquid Fuel Firing	NO _x	---	39.78	2, 3, 9	9, 10	14
		CO	---	49.46			
		VOC	---	4.03			
		PM	---	9.88			
		PM ₁₀	---	9.88			
		PM _{2.5}	---	9.88			
		SO ₂	---	5.24			

Major NSR Summary Table

Permit Numbers: 20041 and N196M1 and PSDTX1590					Issuance Date:		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lbs/hour	TPY (4)	Special Conditions/ Application Information	Special Conditions/ Application Information	Special Conditions/ Application Information
TC7	Test Cell 7 Gas Fuel Firing	NO _x	659.34	---	2, 3, 9	9, 10	
		CO	469.11	---			
		VOC	10.69	---			
		PM	3.66	---			
		PM ₁₀	3.66	---			
		PM _{2.5}	3.66	---			
		SO ₂	4.92	---			
TC7	Test Cell 7 Liquid Fuel Firing	NO _x	989.01	---	2, 3, 9	9, 10	
		CO	470.11	---			
		VOC	10.72	---			
		PM	8.22	---			
		PM ₁₀	8.22	---			
		PM _{2.5}	8.22	---			
		SO ₂	0.60	---			
TC7	Test Cell 7 – Annual Emission Rates Gas and Liquid Fuel Firing	NO _x	---	24.31	2, 3, 9	9, 10	14
		CO	---	6.04			
		VOC	---	0.46			
		PM	---	1.53			
		PM ₁₀	---	1.53			
		PM _{2.5}	---	1.53			
		SO ₂	---	1.88			

Major NSR Summary Table

Permit Numbers: 20041 and N196M1 and PSDTX1590					Issuance Date:		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lbs/hour	TPY (4)	Special Conditions/ Application Information	Special Conditions/ Application Information	Special Conditions/ Application Information
TC7	Test Cell 7 – Annual Emission Rates Gas and Liquid Fuel Firing – 2027 (5)	NO _x	---	49.46	2, 3, 9	9, 10	14
		CO	---	5.84			
		VOC	---	0.46			
		PM	---	1.72			
		PM ₁₀	---	1.72			
		PM _{2.5}	---	1.72			
		SO ₂	---	1.71			
TC7	Test Cell 7 – Annual Emission Rates Gas and Liquid Fuel Firing – 2028 (6)	NO _x	---	58.15	2, 3, 9	9, 10	14
		CO	---	5.74			
		VOC	---	0.47			
		PM	---	1.72			
		PM ₁₀	---	1.72			
		PM _{2.5}	---	1.72			
		SO ₂	---	1.67			
TC7	Test Cell 7 – Annual Emission Rates Gas and Liquid Fuel Firing – 2029 and thereafter (7)	NO _x	---	72.69	2, 3, 9	9, 10	14
		CO	---	7.17			
		VOC	---	0.59			
		PM	---	2.15			
		PM ₁₀	---	2.15			
		PM _{2.5}	---	2.15			
		SO ₂	---	2.09			

Major NSR Summary Table

Permit Numbers: 20041 and N196M1 and PSDTX1590					Issuance Date:		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lbs/hour	TPY (4)	Special Conditions/ Application Information	Special Conditions/ Application Information	Special Conditions/ Application Information
F1	TC1, TC3-5 Process Fugitives (8)	VOC	0.6	0.3			
F2	TC2 Process Fugitives (8)	VOC	0.3	0.1			
F3	TC6 Process Fugitives (8)	VOC	0.01	0.01			
S1	Oil/Water Separator	VOC	0.1	0.3			
S2	TC6 Oil/Water Separator	VOC	0.01	0.05			
S3	TC7 Oil/Water Separator	VOC	0.01	0.05			
CT1	Cooling Tower	VOC	0.08	0.37			
		PM	0.60	2.63			
		PM ₁₀	0.15	0.66			
		PM _{2.5}	0.01	0.03			
		Cl ₂	<0.01	<0.01			
CT3	Cooling Tower	VOC	0.1	0.4			
		PM	0.60	2.63			
		PM ₁₀	0.15	0.66			
		PM _{2.5}	0.01	0.03			
		Cl ₂	<0.01	<0.01			

Major NSR Summary Table

Permit Numbers: 20041 and N196M1 and PSDTX1590					Issuance Date:		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lbs/hour	TPY (4)	Special Conditions/ Application Information	Special Conditions/ Application Information	Special Conditions/ Application Information
CT4	TC6 Cooling Tower	VOC	0.08	0.37			
		PM	0.06	0.26			
		PM ₁₀	0.02	0.09			
		PM _{2.5}	<0.01	<0.01			
		Cl ₂	<0.01	<0.01			
CT5	TC7 Cooling Tower No. 5	VOC	0.08	0.37			
		PM	0.06	0.26			
		PM ₁₀	0.02	0.07			
		PM _{2.5}	<0.01	<0.01			
		Cl ₂	<0.01	<0.01			

(1) Emission point identification - either specific equipment designation or emission point number from plot plan.

(2) Specific point source name. For fugitive sources, use area name or fugitive source name.

- (3)
- NO_x - total oxides of nitrogen
 - CO - carbon monoxide
 - VOC - volatile organic compounds as defined in Title 30 Texas Administrative Code §101.1
 - PM - total particulate matter, suspended in the atmosphere, including PM₁₀ and PM_{2.5}
 - PM₁₀ - total particulate matter equal to or less than 10 microns in diameter, including PM_{2.5}
 - PM_{2.5} - particulate matter equal to or less than 2.5 microns in diameter
 - SO₂ - sulfur dioxide
 - Cl₂ - chlorine

(4) Compliance with annual emission limits (tons per year) is based on a 12-month rolling period.

(5) Emission rates for EPN TC7 are effective for calendar year 2027, and/or for the subsequent calendar year following approval from TCEQ EBT for the NO_x emission credits.

(6) Emission rates for EPN TC7 are effective for calendar year 2028, and/or for the subsequent calendar year following approval from TCEQ EBT for the NO_x emission credits.

(7) Emission rates for EPN TC7 are effective for calendar year 2029, and thereafter, following approval from TCEQ EBT for the NO_x emission credits.

(8) Emission rate is an estimate and is enforceable through compliance with the applicable special condition(s) and permit application representations.

Texas Commission on Environmental Quality

Title V Existing

1333

Site Information (Regulated Entity)

What is the name of the permit area to be authorized?	DALLAS OVERHAUL CENTER
Does the site have a physical address?	Yes
Physical Address	
Number and Street	215 E CENTRE PARK BLVD
City	DESOTO
State	TX
ZIP	75115
County	DALLAS
Latitude (N) (##.#####)	32.6275
Longitude (W) (-###.#####)	96.850277
Primary SIC Code	3511
Secondary SIC Code	
Primary NAICS Code	333611
Secondary NAICS Code	
Regulated Entity Site Information	
What is the Regulated Entity's Number (RN)?	RN100219963
What is the name of the Regulated Entity (RE)?	SOLAR TURBINES DLS OVERHAUL CENTER
Does the RE site have a physical address?	Yes
Physical Address	
Number and Street	215 E CENTRE PARK BLVD
City	DESOTO
State	TX
ZIP	75115
County	DALLAS
Latitude (N) (##.#####)	32.6275
Longitude (W) (-###.#####)	-96.850277
Facility NAICS Code	
What is the primary business of this entity?	INDUSTRIAL CHEMICAL MANUFACTURING PLANT

Customer (Applicant) Information

How is this applicant associated with this site?	Owner Operator
What is the applicant's Customer Number (CN)?	CN600127518
Type of Customer	Corporation
Full legal name of the applicant:	
Legal Name	Solar Turbines Incorporated
Texas SOS Filing Number	5330206
Federal Tax ID	953621514
State Franchise Tax ID	19536215148

State Sales Tax ID	
Local Tax ID	
DUNS Number	42261099
Number of Employees	101-250
Independently Owned and Operated?	No

Responsible Official Contact

Person TCEQ should contact for questions about this application:

Organization Name	SOLAR TURBINES INCORPORATED
Prefix	MR
First	ADAM
Middle	
Last	NAMMARI
Suffix	
Credentials	
Title	PLANT MANAGER
Enter new address or copy one from list:	
Mailing Address	
Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	215 E CENTRE PARK BLVD
Routing (such as Mail Code, Dept., or Attn:)	
City	DESOTO
State	TX
ZIP	75115
Phone (###-###-####)	9722285535
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	9722286180
E-mail	NAMMARI_ADAM_Z@SOLARTURBINES.COM

Technical Contact

Person TCEQ should contact for questions about this application:

Select existing TC contact or enter a new contact.	GIL DIEKHOFF(SOLAR TURBINES ...)
Organization Name	SOLAR TURBINES INCORPORATED
Prefix	MR
First	GIL
Middle	
Last	DIEKHOFF
Suffix	
Credentials	
Title	EHS MANAGER
Enter new address or copy one from list:	
Mailing Address	
Address Type	Domestic

Mailing Address (include Suite or Bldg. here, if applicable)

215 E CENTRE PARK BLVD

Routing (such as Mail Code, Dept., or Attn:)

City

DESOTO

State

TX

ZIP

75115

Phone (###-###-####)

9722286157

Extension

Alternate Phone (###-###-####)

Fax (###-###-####)

9722286180

E-mail

DIEKHOFF_GIL_P@SOLARTURBINES.COM

Title V General Information - Existing

1) Permit Type:	SOP
2) Permit Latitude Coordinate:	32 Deg 37 Min 39 Sec
3) Permit Longitude Coordinate:	96 Deg 51 Min 1 Sec
4) Is this submittal a new application or an update to an existing application?	New Application
4.1. What type of permitting action are you applying for?	Streamlined Revision
4.1.1. Are there any permits that should be voided upon issuance of this permit application through permit conversion?	No
4.1.2. Are there any permits that should be voided upon issuance of this permit application through permit consolidation?	No
5) Does this application include Acid Rain Program or Cross-State Air Pollution Rule requirements?	No

Title V Attachments Existing

Attach OP-1 (Site Information Summary)

Attach OP-2 (Application for Permit Revision/Renewal)

[File Properties]

File Name

OP_2_op-2 030124.docx

Hash

AF190EF1620407AC2FA7061D8DAE49A410AAAC93791A7C9003639121FB3673CE

MIME-Type

application/vnd.openxmlformats-officedocument.wordprocessingml.document

Attach OP-REQ1 (Application Area-Wide Applicability Determinations and General Information)

Attach OP-REQ2 (Negative Applicable Requirement Determinations)

Attach OP-REQ3 (Applicable Requirements Summary)

Attach OP-PBRSUP (Permits by Rule Supplemental Table)

Attach OP-SUMR (Individual Unit Summary for Revisions)

Attach OP-MON (Monitoring Requirements)

Attach OP-UA (Unit Attribute) Forms

If applicable, attach OP-AR1 (Acid Rain Permit Application)

Attach OP-CRO2 (Change of Responsible Official Information)

Attach OP-DEL (Delegation of Responsible Official)

Attach any other necessary information needed to complete the permit.

[File Properties]

File Name	Solar Turbines NSR ERC Minor Revision Request 030724.pdf
Hash	9B700566EC66FCA68525FBE4AAD2346A3A938379ABB40E6426F39684D11EF617
MIME-Type	application/pdf

An additional space to attach any other necessary information needed to complete the permit.

[File Properties]

File Name	Major NSR Summary Table 20041 030124.docx
Hash	AC9B0F2CC310EC594F2C5B39A9E1E2AE0EC2E50385001DB4FD143581198347EF
MIME-Type	application/vnd.openxmlformats-officedocument.wordprocessingml.document

Expedite Title V

1) Per Texas Health and Safety Code, Section 382.05155, does the applicant want to expedite the processing of this application?	No
---	----

Certification

I certify that I am the Responsible Official for this application and that, based on information and belief formed after reasonable inquiry, the statements and information on this form are true, accurate, and complete.

1. I am Adam Z Nammari, the owner of the STEERS account ER055736.
2. I have the authority to sign this data on behalf of the applicant named above.
3. I have personally examined the foregoing and am familiar with its content and the content of any attachments, and based upon my personal knowledge and/or inquiry of any individual responsible for information contained herein, that this information is true, accurate, and complete.
4. I further certify that I have not violated any term in my TCEQ STEERS participation agreement and that I have no reason to believe that the confidentiality or use of my password has been compromised at any time.
5. I understand that use of my password constitutes an electronic signature legally equivalent to my written signature.
6. I also understand that the attestations of fact contained herein pertain to the implementation, oversight and enforcement of a state and/or federal environmental program and must be true and complete to the best of my knowledge.
7. I am aware that criminal penalties may be imposed for statements or omissions that I know or have reason to believe are untrue or misleading.
8. I am knowingly and intentionally signing Title V Existing 1333.
9. My signature indicates that I am in agreement with the information on this form, and authorize its submittal to the TCEC

OWNER OPERATOR Signature: Adam Z Nammari OWNER OPERATOR

Account Number:	ER055736
Signature IP Address:	198.180.154.21
Signature Date:	2024-03-07
Signature Hash:	DFC06867F6986AA213A7CB3359890FAF586282D9C819543B27365A00C9A50118
Form Hash Code at time of Signature:	CC46AEFADD63AE2C3C3DD0CE1AE93B071AE7868563A53A3C001DFBE49D4838F2

Submission

Reference Number:	The application reference number is 600670
Submitted by:	The application was submitted by ER055736/Adam Z Nammari
Submitted Timestamp:	The application was submitted on 2024-03-07 at 11:31:18 CST
Submitted From:	The application was submitted from IP address 198.180.154.21
Confirmation Number:	The confirmation number is 527750
Steers Version:	The STEERS version is 6.73
Permit Number:	The permit number is 1333

Additional Information

Application Creator: This account was created by Stuart L Keil

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
TITLE V PERMIT O1333

STREAMLINED REVISION REQUEST

SOLAR TURBINES INCORPORATED
DESOTO, DALLAS COUNTY
ACCOUNT ID NO. DB-1494-I
CUSTOMER NO. 600127518
REGULATED ENTITY NO. 100219963

March 7, 2024

Prepared by:



Stuart L. Keil, P.E.

Stuart L. Keil, P.E.
Keil Environmental, Inc.
413 Honeycomb Ridge
Austin, Texas 78746
TBPELS Registration No. F-4725

Solar Turbines Incorporated
March 2024

TABLE OF CONTENTS

Attachment

Attachments

Application for Permit Revision/Renewal, Form OP-2	A
Major NSR Summary Table	B
Copy of the Current NSR Permit Nos. 20041, N196M1 and PSDTX1590	C

Solar Turbines Incorporated
March 2024

**APPENDIX A
APPLICATION FOR PERMIT REVISION/RENEWAL,
FORM OP-2**

**Federal Operating Permit Program
Application for Permit Revision/Renewal
Form OP-2-Table 1
Texas Commission on Environmental Quality**

Date: 03/07/2024	
Permit No.: O1333	
Regulated Entity No.: RN100219963	
Company Name: Solar Turbines Incorporated	
For Submissions to EPA	
Has an electronic copy of this application been submitted (or is being submitted) to EPA? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	
I. Application Type	
Indicate the type of application:	
<input type="checkbox"/> Renewal	
<input checked="" type="checkbox"/> Streamlined Revision (Must include provisional terms and conditions as explained in the instructions.)	
<input type="checkbox"/> Significant Revision	
<input type="checkbox"/> Revision Requesting Prior Approval	
<input type="checkbox"/> Administrative Revision	
<input type="checkbox"/> Response to Reopening	
II. Qualification Statement	
For SOP Revisions Only <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	
For GOP Revisions Only <input type="checkbox"/> YES <input type="checkbox"/> NO	

Federal Operating Permit Program
Application for Permit Revision/Renewal
Form OP-2-Table 1 (continued)
Texas Commission on Environmental Quality

III. Major Source Pollutants (Complete this section if the permit revision is due to a change at the site or change in regulations.)

Indicate all pollutants for which the site is a major source based on the site's potential to emit:

(Check the appropriate box[es].)

☐ VOC ☒ NO_x ☐ SO₂ ☐ PM₁₀ ☐ CO ☐ Pb ☐ HAP

Other:

IV. Reference Only Requirements (For reference only)

Has the applicant paid emissions fees for the most recent agency fiscal year (September 1 - August 31)? ☒ YES ☐ NO ☐ N/A

V. Delinquent Fees and Penalties

Notice: This form will not be processed until all delinquent fees and/or penalties owed to the TCEQ or the Office of the Attorney General on behalf of the TCEQ are paid in accordance with the Delinquent Fee and penalty protocol.

**Federal Operating Permit Program
Application for Permit Revision/Renewal
Form OP-2-Table 2
Texas Commission on Environmental Quality**

Date: 03/07/2024
Permit No.: O1333
Regulated Entity No.: RN100219963
Company Name: Solar Turbines Incorporated

Using the table below, provide a description of the revision.

Revision No.	Revision Code	New Unit	Unit/Group	Process	NSR Authorization	Description of Change and Provisional Terms and Conditions
			ID No.	Applicable Form		
1	MS-A	NO	TC7	Major NSR Summary Table	20041, N196M1, PSDTX1590	Regarding the required offsets for Test Cell No. 7, Solar Turbines Incorporated was issued an NSR permit alteration on 2/23/2024 to identify the most recent EBT-approved credits by their TCEQ credit certificate numbers. This alteration creates the need to update the Major NSR Summary Table attached to the Title V permit, the accompanying copy of the federal nonattainment and PSD permit, and the permit issuance date on the Title V permit's NSR Authorization References Table.

Solar Turbines Incorporated
March 2024

ATTACHMENT B
MAJOR NSR SUMMARY TABLE

Major NSR Summary Table

Permit Numbers: 20041 and N196M1 and PSDTX1590					Issuance Date:		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lbs/hour	TPY (4)	Special Conditions/ Application Information	Special Conditions/ Application Information	Special Conditions/ Application Information
TC1	Test Cell 1 Gas fuel firing	NO _x	106.9	---	2, 3, 9	9, 10	
		CO	84.8	---			
		VOC	46.6	---			
		PM	5.3	---			
		PM ₁₀	5.3	---			
		PM _{2.5}	5.3	---			
		SO ₂	2.0	---			
TC1	Test Cell 1 Liquid fuel firing	NO _x	181.5	---	2, 3, 9	9, 10	
		CO	88.8	---			
		VOC	20.4	---			
		PM	15.7	---			
		PM ₁₀	15.7	---			
		PM _{2.5}	15.7	---			
		SO ₂	7.5	---			
TC1	Test Cell 1 - Annual Emission Rate Gas and Liquid Fuel Firing	NO _x	---	100.2	2, 3, 9	9, 10	14
		CO	---	27.7			
		VOC	---	9.4			
		PM	---	10.7			
		PM ₁₀	---	10.7			
		PM _{2.5}	---	10.7			
		SO ₂	---	2.9			

Major NSR Summary Table

Permit Numbers: 20041 and N196M1 and PSDTX1590					Issuance Date:		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lbs/hour	TPY (4)	Special Conditions/ Application Information	Special Conditions/ Application Information	Special Conditions/ Application Information
TC2	Test Cell 2 Gas Fuel Firing	NO _x	8.7	---	2, 3, 9	9, 10	
		CO	18.4	---			
		VOC	4.7	---			
		PM	0.7	---			
		PM ₁₀	0.7	---			
		PM _{2.5}	0.7	---			
		SO ₂	0.4	---			
TC2	Test Cell 2 Liquid Fuel Firing	NO _x	13.0	---	2, 3, 9	9, 10	
		CO	37.0	---			
		VOC	4.7	---			
		PM	3.5	---			
		PM ₁₀	3.5	---			
		PM _{2.5}	3.5	---			
		SO ₂	1.5	---			
TC2	Test Cell 2 – Annual Emission Rates Gas and Liquid Fuel Firing	NO _x	---	8.7	2, 3, 9	9, 10	14
		CO	---	9.2			
		VOC	---	0.9			
		PM	---	1.9			
		PM ₁₀	---	1.9			
		PM _{2.5}	---	1.9			
		SO ₂	---	0.8			

Major NSR Summary Table

Permit Numbers: 20041 and N196M1 and PSDTX1590					Issuance Date:		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lbs/hour	TPY (4)	Special Conditions/ Application Information	Special Conditions/ Application Information	Special Conditions/ Application Information
TC3	Test Cell 3 Gas Fuel Firing	NO _x	80.0	---	2, 3, 9	9, 10	
		CO	84.8	---			
		VOC	13.5	---			
		PM	2.5	---			
		PM ₁₀	2.5	---			
		PM _{2.5}	2.5	---			
		SO ₂	1.1	---			
TC3	Test Cell 3 Liquid Fuel Firing	NO _x	120.0	---	2, 3, 9	9, 10	
		CO	45.6	---			
		VOC	7.2	---			
		PM	15.7	---			
		PM ₁₀	15.7	---			
		PM _{2.5}	15.7	---			
		SO ₂	4.8	---			
TC3	Test Cell 3 – Annual Emission Rates Gas and Liquid Fuel Firing	NO _x	---	35.9	2, 3, 9	9, 10	14
		CO	---	19.4			
		VOC	---	1.8			
		PM	---	10.7			
		PM ₁₀	---	10.7			
		PM _{2.5}	---	10.7			
		SO ₂	---	2.7			

Major NSR Summary Table

Permit Numbers: 20041 and N196M1 and PSDTX1590					Issuance Date:		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lbs/hour	TPY (4)	Special Conditions/ Application Information	Special Conditions/ Application Information	Special Conditions/ Application Information
TC4	Test Cell 4 Gas Fuel Firing	NO _x	106.9	---	2, 3, 9	9, 10	
		CO	84.8	---			
		VOC	46.6	---			
		PM	5.3	---			
		PM ₁₀	5.3	---			
		PM _{2.5}	5.3	---			
		SO ₂	2.0	---			
TC4	Test Cell 4 Liquid Fuel Firing	NO _x	181.5	---	2, 3, 9	9, 10	
		CO	41.3	---			
		VOC	14.3	---			
		PM	15.7	---			
		PM ₁₀	15.7	---			
		PM _{2.5}	15.7	---			
		SO ₂	7.5	---			
TC4	Test Cell 4 – Annual Emission Rates Gas and Liquid Fuel Firing	NO _x	---	100.2	2, 3, 9	9, 10	14
		CO	---	27.7			
		VOC	---	9.4			
		PM	---	10.7			
		PM ₁₀	---	10.7			
		PM _{2.5}	---	10.7			
		SO ₂	---	2.9			

Major NSR Summary Table

Permit Numbers: 20041 and N196M1 and PSDTX1590					Issuance Date:		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lbs/hour	TPY (4)	Special Conditions/ Application Information	Special Conditions/ Application Information	Special Conditions/ Application Information
TC5	Test Cell 5 Gas Fuel Firing	NO _x	192.8	---	2, 3, 9	9, 10	
		CO	30.0	---			
		VOC	8.8	---			
		PM	8.5	---			
		PM ₁₀	8.5	---			
		PM _{2.5}	8.5	---			
		SO ₂	3.8	---			
TC5	Test Cell 5 Liquid Fuel Firing	NO _x	338.8	---	2, 3, 9	9, 10	
		CO	30.0	---			
		VOC	8.8	---			
		PM	12.1	---			
		PM ₁₀	12.1	---			
		PM _{2.5}	12.1	---			
		SO ₂	14.1	---			
TC5	Test Cell 5 – Annual Emission Rates Gas and Liquid Fuel Firing	NO _x	---	74.53	2, 3, 9	9, 10	14
		CO	---	25.48			
		VOC	---	5.81			
		PM	---	7.49			
		PM ₁₀	---	7.49			
		PM _{2.5}	---	7.49			
		SO ₂	---	4.15			

Major NSR Summary Table

Permit Numbers: 20041 and N196M1 and PSDTX1590					Issuance Date:		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lbs/hour	TPY (4)	Special Conditions/ Application Information	Special Conditions/ Application Information	Special Conditions/ Application Information
TC6	Test Cell 6 Gas Fuel Firing	NO _x	298.43	---	2, 3, 9	9, 10	
		CO	26.00	---			
		VOC	1.49	---			
		PM	4.21	---			
		PM ₁₀	4.21	---			
		PM _{2.5}	4.21	---			
		SO ₂	3.04	---			
TC6	Test Cell 6 Liquid Fuel Firing	NO _x	409.53	---	2, 3, 9	9, 10	
		CO	26.29	---			
		VOC	7.50	---			
		PM	13.60	---			
		PM ₁₀	13.60	---			
		PM _{2.5}	13.60	---			
		SO ₂	0.35	---			
TC6	Test Cell 6 – Annual Emission Rates Gas and Liquid Fuel Firing	NO _x	---	39.78	2, 3, 9	9, 10	14
		CO	---	49.46			
		VOC	---	4.03			
		PM	---	9.88			
		PM ₁₀	---	9.88			
		PM _{2.5}	---	9.88			
		SO ₂	---	5.24			

Major NSR Summary Table

Permit Numbers: 20041 and N196M1 and PSDTX1590					Issuance Date:		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lbs/hour	TPY (4)	Special Conditions/ Application Information	Special Conditions/ Application Information	Special Conditions/ Application Information
TC7	Test Cell 7 Gas Fuel Firing	NO _x	659.34	---	2, 3, 9	9, 10	
		CO	469.11	---			
		VOC	10.69	---			
		PM	3.66	---			
		PM ₁₀	3.66	---			
		PM _{2.5}	3.66	---			
		SO ₂	4.92	---			
TC7	Test Cell 7 Liquid Fuel Firing	NO _x	989.01	---	2, 3, 9	9, 10	
		CO	470.11	---			
		VOC	10.72	---			
		PM	8.22	---			
		PM ₁₀	8.22	---			
		PM _{2.5}	8.22	---			
		SO ₂	0.60	---			
TC7	Test Cell 7 – Annual Emission Rates Gas and Liquid Fuel Firing	NO _x	---	24.31	2, 3, 9	9, 10	14
		CO	---	6.04			
		VOC	---	0.46			
		PM	---	1.53			
		PM ₁₀	---	1.53			
		PM _{2.5}	---	1.53			
		SO ₂	---	1.88			

Major NSR Summary Table

Permit Numbers: 20041 and N196M1 and PSDTX1590					Issuance Date:		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lbs/hour	TPY (4)	Special Conditions/ Application Information	Special Conditions/ Application Information	Special Conditions/ Application Information
TC7	Test Cell 7 – Annual Emission Rates Gas and Liquid Fuel Firing – 2027 (5)	NO _x	---	49.46	2, 3, 9	9, 10	14
		CO	---	5.84			
		VOC	---	0.46			
		PM	---	1.72			
		PM ₁₀	---	1.72			
		PM _{2.5}	---	1.72			
		SO ₂	---	1.71			
TC7	Test Cell 7 – Annual Emission Rates Gas and Liquid Fuel Firing – 2028 (6)	NO _x	---	58.15	2, 3, 9	9, 10	14
		CO	---	5.74			
		VOC	---	0.47			
		PM	---	1.72			
		PM ₁₀	---	1.72			
		PM _{2.5}	---	1.72			
		SO ₂	---	1.67			
TC7	Test Cell 7 – Annual Emission Rates Gas and Liquid Fuel Firing – 2029 and thereafter (7)	NO _x	---	72.69	2, 3, 9	9, 10	14
		CO	---	7.17			
		VOC	---	0.59			
		PM	---	2.15			
		PM ₁₀	---	2.15			
		PM _{2.5}	---	2.15			
		SO ₂	---	2.09			

Major NSR Summary Table

Permit Numbers: 20041 and N196M1 and PSDTX1590					Issuance Date:		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lbs/hour	TPY (4)	Special Conditions/ Application Information	Special Conditions/ Application Information	Special Conditions/ Application Information
F1	TC1, TC3-5 Process Fugitives (8)	VOC	0.6	0.3			
F2	TC2 Process Fugitives (8)	VOC	0.3	0.1			
F3	TC6 Process Fugitives (8)	VOC	0.01	0.01			
S1	Oil/Water Separator	VOC	0.1	0.3			
S2	TC6 Oil/Water Separator	VOC	0.01	0.05			
S3	TC7 Oil/Water Separator	VOC	0.01	0.05			
CT1	Cooling Tower	VOC	0.08	0.37			
		PM	0.60	2.63			
		PM ₁₀	0.15	0.66			
		PM _{2.5}	0.01	0.03			
		Cl ₂	<0.01	<0.01			
CT3	Cooling Tower	VOC	0.1	0.4			
		PM	0.60	2.63			
		PM ₁₀	0.15	0.66			
		PM _{2.5}	0.01	0.03			
		Cl ₂	<0.01	<0.01			

Major NSR Summary Table

Permit Numbers: 20041 and N196M1 and PSDTX1590					Issuance Date:		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lbs/hour	TPY (4)	Special Conditions/ Application Information	Special Conditions/ Application Information	Special Conditions/ Application Information
CT4	TC6 Cooling Tower	VOC	0.08	0.37			
		PM	0.06	0.26			
		PM ₁₀	0.02	0.09			
		PM _{2.5}	<0.01	<0.01			
		Cl ₂	<0.01	<0.01			
CT5	TC7 Cooling Tower No. 5	VOC	0.08	0.37			
		PM	0.06	0.26			
		PM ₁₀	0.02	0.07			
		PM _{2.5}	<0.01	<0.01			
		Cl ₂	<0.01	<0.01			

(1) Emission point identification - either specific equipment designation or emission point number from plot plan.

(2) Specific point source name. For fugitive sources, use area name or fugitive source name.

- (3)
- NO_x - total oxides of nitrogen
 - CO - carbon monoxide
 - VOC - volatile organic compounds as defined in Title 30 Texas Administrative Code §101.1
 - PM - total particulate matter, suspended in the atmosphere, including PM₁₀ and PM_{2.5}
 - PM₁₀ - total particulate matter equal to or less than 10 microns in diameter, including PM_{2.5}
 - PM_{2.5} - particulate matter equal to or less than 2.5 microns in diameter
 - SO₂ - sulfur dioxide
 - Cl₂ - chlorine

(4) Compliance with annual emission limits (tons per year) is based on a 12-month rolling period.

(5) Emission rates for EPN TC7 are effective for calendar year 2027, and/or for the subsequent calendar year following approval from TCEQ EBT for the NO_x emission credits.

(6) Emission rates for EPN TC7 are effective for calendar year 2028, and/or for the subsequent calendar year following approval from TCEQ EBT for the NO_x emission credits.

(7) Emission rates for EPN TC7 are effective for calendar year 2029, and thereafter, following approval from TCEQ EBT for the NO_x emission credits.

(8) Emission rate is an estimate and is enforceable through compliance with the applicable special condition(s) and permit application representations.

Solar Turbines Incorporated
March 2024

ATTACHMENT C
COPY OF THE CURRENT NSR PERMIT
NOS. 20041, N196M1 AND PSDTX1590

Jon Niermann, *Chairman*
Bobby Janecka, *Commissioner*
Catarina R. Gonzales, *Commissioner*
Kelly Keel, *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

February 23, 2024

MR ADAM Z NAMMARI
GENERAL MANAGER
SOLAR TURBINES INCORPORATED
215 E CENTRE PARK BLVD
DESOTO TX 75115-2481

Re: Permit Alteration
Permit Number: 20041
Expiration Date: December 23, 2025
Solar Turbines Incorporated
Solar Turbines Dallas Overhaul Center
Desoto, Dallas County
Regulated Entity Number: RN100219963
Customer Reference Number: CN600127518
Associated Permit Numbers: N196M1 and PSDTX1590

Dear Mr. Nammari:

SOLAR TURBINES INCORPORATED has requested alteration of the conditions and Maximum Allowable Emission Rates Table (MAERT) of the above-referenced permit.

In accordance with Title 30 Texas Administrative Code §116.116(c), Permit Number 20041 is altered. Enclosed are the new general conditions, altered special conditions, and altered MAERT. Please attach these to your permit.

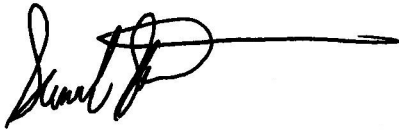
All preconstruction authorizations (including authorization for emissions of greenhouse gases, if applicable) should be obtained prior to start of construction.

If you need further information or have any questions, please contact Ms. Oreoluwa Adetutu at (512) 239-1251 or write to the Texas Commission on Environmental Quality, Office of Air, Air Permits Division, MC-163, P.O. Box 13087, Austin, Texas 78711-3087.

Mr. Adam Z Nammari
Page 2
February 23, 2024

Re: Permit Number: 20041

Sincerely,

A handwritten signature in black ink, appearing to read 'Samuel Short', followed by a long horizontal line extending to the right.

Samuel Short, Deputy Director
Air Permits Division
Office of Air
Texas Commission on Environmental Quality

Enclosure

cc: Air Section Manager, Region 4 - Dallas/Fort Worth
Air Permits Section Chief, New Source Review Section (6PD-R), U.S. Environmental Protection
Agency, Region 6, Dallas

Project Number: 366375



Texas Commission on Environmental Quality Air Quality Permit

A Permit Is Hereby Issued To
Solar Turbines Incorporated
Authorizing the Construction and Operation of
Solar Turbines Dallas Overhaul Center
Located at Desoto, Dallas County, Texas
Latitude 32.6275 Longitude -96.850277

Permits: 20041, N196M1 and PSDTX1590

Revision Date: February 23, 2024

Expiration Date: December 23, 2025



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 (TAC) Section 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]
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)]
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 in a timely manner; comply with any additional recordkeeping requirements specified in special conditions in 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 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 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 "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.

Common Acronyms in Air Permits

°C = Temperature in degrees Celsius	GLC _{max} = maximum (predicted) ground-level concentration
°F = Temperature in degrees Fahrenheit	gpm = gallon per minute
°K = Temperature in degrees Kelvin	gr/1000scf = grain per 1000 standard cubic feet
µg = microgram	gr/dscf = grain per dry standard cubic feet
µg/m ³ = microgram per cubic meter	H ₂ CO = formaldehyde
acfm = actual cubic feet per minute	H ₂ S = hydrogen sulfide
AMOC = alternate means of control	H ₂ SO ₄ = sulfuric acid
AOS = alternative operating scenario	HAP = hazardous air pollutant as listed in § 112(b) of the Federal Clean Air Act or Title 40 Code of Federal Regulations Part 63, Subpart C
AP-42 = Air Pollutant Emission Factors, 5th edition	HC = hydrocarbons
APD = Air Permits Division	HCl = hydrochloric acid, hydrogen chloride
API = American Petroleum Institute	Hg = mercury
APWL = air pollutant watch list	HGB = Houston/Galveston/Brazoria
BPA = Beaumont/ Port Arthur	hp = horsepower
BACT = best available control technology	hr = hour
BAE = baseline actual emissions	IFR = internal floating roof tank
bbl = barrel	in H ₂ O = inches of water
bbl/day = barrel per day	in Hg = inches of mercury
bhp = brake horsepower	IR = infrared
BMP = best management practices	ISC3 = Industrial Source Complex, a dispersion model
Btu = British thermal unit	ISCST3 = Industrial Source Complex Short-Term, a dispersion model
Btu/scf = British thermal unit per standard cubic foot or feet	K = Kelvin; extension of the degree Celsius scaled-down to absolute zero
CAA = Clean Air Act	LACT = lease automatic custody transfer
CAM = compliance-assurance monitoring	LAER = lowest achievable emission rate
CEMS = continuous emissions monitoring systems	lb = pound
cfm = cubic feet (per) minute	lb/day = pound per day
CFR = Code of Federal Regulations	lb/hr = pound per hour
CN = customer ID number	lb/MMBtu = pound per million British thermal units
CNG = compressed natural gas	LDAR = Leak Detection and Repair (Requirements)
CO = carbon monoxide	LNG = liquefied natural gas
COMS = continuous opacity monitoring system	LPG = liquefied petroleum gas
CPMS = continuous parametric monitoring system	LT/D = long ton per day
DFW = Dallas/ Fort Worth (Metroplex)	m = meter
DE = destruction efficiency	m ³ = cubic meter
DRE = destruction and removal efficiency	m/sec = meters per second
dscf = dry standard cubic foot or feet	MACT = maximum achievable control technology
dscfm = dry standard cubic foot or feet per minute	MAERT = Maximum Allowable Emission Rate Table
ED = (TCEQ) Executive Director	MERA = Modeling and Effects Review Applicability
EF = emissions factor	mg = milligram
EFR = external floating roof tank	mg/g = milligram per gram
EGU = electric generating unit	mL = milliliter
EI = Emissions Inventory	MMBtu = million British thermal units
ELP = El Paso	MMBtu/hr = million British thermal units per hour
EPA = (United States) Environmental Protection Agency	MSDS = material safety data sheet
EPN = emission point number	MSS = maintenance, startup, and shutdown
ESL = effects screening level	MW = megawatt
ESP = electrostatic precipitator	NAAQS = National Ambient Air Quality Standards
FCAA = Federal Clean Air Act	NESHAP = National Emission Standards for Hazardous Air Pollutants
FCCU = fluid catalytic cracking unit	NGL = natural gas liquids
FID = flame ionization detector	NNSR = nonattainment new source review
FIN = facility identification number	NO _x = total oxides of nitrogen
ft = foot or feet	NSPS = New Source Performance Standards
ft/sec = foot or feet per second	
g = gram	
gal/wk = gallon per week	
gal/yr = gallon per year	
GLC = ground level concentration	

PAL = plant-wide applicability limit
PBR = Permit(s) by Rule
PCP = pollution control project
PEMS = predictive emission monitoring system
PID = photo ionization detector
PM = periodic monitoring
PM = total particulate matter, suspended in the atmosphere, including PM₁₀ and PM_{2.5}, as represented
PM_{2.5} = particulate matter equal to or less than 2.5 microns in diameter
PM₁₀ = total particulate matter equal to or less than 10 microns in diameter, including PM_{2.5}, as represented
POC = products of combustion
ppb = parts per billion
ppm = parts per million
ppmv = parts per million (by) volume
psia = pounds (per) square inch, absolute
psig = pounds (per) square inch, gage
PTE = potential to emit
RA = relative accuracy
RATA = relative accuracy test audit
RM = reference method
RVP = Reid vapor pressure
scf = standard cubic foot or feet
scfm = standard cubic foot or feet (per) minute
SCR = selective catalytic reduction
SIL = significant impact levels
SNCR = selective non-catalytic reduction
SO₂ = sulfur dioxide
SOCMI = synthetic organic chemical manufacturing industry
SRU = sulfur recovery unit
TAC = Texas Administrative Code
TCAA = Texas Clean Air Act
TCEQ = Texas Commission on Environmental Quality
TD = Toxicology Division
TLV = threshold limit value
TMDL = total maximum daily load
tpd = tons per day
tpy = tons per year
TVP = true vapor pressure
VOC = volatile organic compounds as defined in Title 30 Texas Administrative Code § 101.1
VRU = vapor recovery unit or system

Special Conditions

Permit Number 20041, N196M1, and PSDTX1590

Emission Standards

1. This permit covers only those sources of emissions listed in the attached table entitled "Emission Sources - Maximum Allowable Emission Rates (MAERT)," and those sources are limited to the emission limits and other conditions specified in that attached table. Compliance with the annual emission limits shall be based on a rolling 12-month year rather than the calendar year.

If any condition or limitation of this permit or of any Texas Commission on Environmental Quality (TCEQ) regulation is more stringent than another, then the more stringent condition or limitation shall govern and be the standard by which compliance will be demonstrated.

Opacity / Visible Emissions

2. Opacity of emissions from Emission Point Nos. (EPNs): TC2 and TC3 must not exceed 20 percent; EPNs: TC1, TC4, TC6 and TC7 must not exceed 15 percent and EPN: TC5 must not exceed 10 percent averaged over a six-minute period except for those periods described in Title 30 Texas Administrative Code § 111.111(a)(1)(E). Opacity shall be determined by using the U.S. Environmental Protection Agency Method 9. **(08/21)**
3. A visual check of the test cell exhaust shall be made on each turbine immediately after startup, while idling, and at each test load. If excess visible emissions are expected to be present for more than the six minutes allowed in 30 TAC § 111.111(a)(1)(E) for the initial start-up, or if excess visible emissions occur while idling or after a test load change, the unit under test shall be shut down as soon as practicable and not restarted until the cause of the excess emissions has been corrected. **(08/21)**

Fuel Limitations

4. Fuel fired in the turbines under testing is limited to one of the following:
 - A. Pipeline-quality, sweet natural gas containing no more than 5.0 grains total sulfur per 100 dry standard cubic feet.
 - B. Distillate fuel oil containing no more than 0.05 weight percent total sulfur for EPNs: TC1 through TC5. **(12/14)**
 - C. Distillate fuel oil for EPNs: TC6 and TC7 is limited to a sulfur content of 15 parts per million, wet. **(08/21)**
 - D. Distillate fuel oil firing is limited as follows: **(08/21)**
 - (1) Distillate fuel oil shall not be fired in EPNs TC1 through TC5 for more than a total of 16 hours per 24-hour period;
 - (2) No more than two test cells among EPNs TC1 through TC5 shall fire distillate fuel oil concurrently;
 - (3) Distillate fuel firing in EPN TC7 shall not occur when distillate fuel is also fired in more than two other cells among EPNs TC1 through TC6.

Operational Limitations

5. All parking lots and plant roads shall be paved and regularly cleaned to achieve maximum control of dust emissions.
6. Contaminated lubricating oil drained from the turbines shall be washed down the waste oil handling system as soon as practicable.
7. All lubricating oil and fuel oil spills shall be cleaned up immediately or washed into the waste oil handling system as soon as practicable.
8. Waste lubricating oil shall be stored in closed containers until shipped off-site by an authorized waste disposal service.

Continuous Demonstration of Compliance

9. To demonstrate compliance with Special Condition No. 1, actual emissions of nitrogen oxides, carbon monoxide, volatile organic compounds, and particulate matter from each test cell will be calculated according to the following formula: **(08/10)**

Emissions = Nominal or Engine-Specific Emission Factor x Actual Fuel Usage during the Test

- A. Emissions must be in pounds per hour (lb/hr);
- B. The emission factor must be in pounds of pollutant per pound of fuel (lb of emissions/lb of fuel) or pounds of emissions per million British thermal units (lb of emissions/MMBtu), must be pollutant specific, considering the fuel type and emission controls, and be the nominal emission factors used to develop guaranteed emission levels provided to customers or engine-specific emission factors. These factors are to be derived from the manufacturer's emission test database or from an emissions model if the turbines have not been tested before, and these factors may be corrected for ambient conditions at the test cell; and **(08/21)**
- C. The actual fuel usage during the test will be expressed in pounds or MMBtu per hour (lb/hr or MMBtu/hr), as applicable, depending on the units used in Special Condition 9.B, above.

Actual emissions of sulfur dioxide (SO₂) will be calculated by assuming that the fuel has the maximum sulfur content allowed under Special Condition No. 4 and that 100 percent of the sulfur in the fuel is converted to SO₂. The permit holder may base these calculations either on full load fuel consumption for the duration of the test or on the actual fuel consumption during each test.

Recordkeeping Requirements

10. In addition to the recordkeeping requirements specified in General Condition No. 7, the following records shall be maintained at the plant site on a five-year rolling retention basis and be made available at the request of personnel of the TCEQ or any air pollution control agency with jurisdiction. **(08/21)**
 - A. The following data shall be recorded for each turbine test: model of turbine tested, the type of fuel fired, the duration of the test, and whether water injection was used.

- B. The data required in Special Condition No. 9.A shall be recorded daily, and a summary shall be produced monthly that represents emissions from each test cell in lb/hr on a daily basis and tons emitted for the previous 12-month period. The data shall be reduced using the calculation methods specified in Special Condition No. 9.
- C. The daily, monthly, and annual records required in Special Condition No. 10.A and 10.B shall be kept in a central location with examples of the method of data reduction including units, conversion factors, assumptions, and the basis of the assumptions.
- D. To demonstrate compliance with Special Condition No. 4, the permit holder must keep records of fuel analyses, as obtained from the supplier on an annual basis for natural gas and on a shipment basis for liquid fuel, or must maintain a contract with the fuel supplier that guarantees compliance. **(06/02)**
- E. The holder of this permit shall document the check for visible emissions in order to show compliance with Special Condition No. 3. **(01/07)**
- F. Records of annual emissions from Test Cell 7 (EPN TC7) shall be maintained which demonstrate compliance with the annualized MAERT and Nonattainment New Source Review (NNSR) - Emission Reductions limitations in this permit. These records of emissions shall be calculated utilizing the methodology found in Special Condition No. 9. **(08/21)**
- G. The holder of this permit shall document hazardous air pollutant emissions resulting from the operation of all sources at the site to demonstrate compliance with Special Condition No. 17. **(09/04)**

Nonattainment New Source Review (NNSR) - Emission Reductions

- 11. This Nonattainment New Source Review (NNSR) permit is issued/approved based on the requirement that the permit holder offset the project emission increase for facilities authorized by this permit prior to the commencement of operation, through participation in the TCEQ Emission Banking and Trading (EBT) Program in accordance with the rules in 30 TAC Chapter 101, Subchapter H. **(08/21)**
- 12. This NNSR permit is issued/approved based on the use of 47.8 tpy of NO_x emission credits from TCEQ Emission Reduction Credit Certificate (ERCC) No. 2803. This ERCC provides offsets at the ratio of 1.2 to 1 for 39.8 tpy of NO_x from EPN: TC6. The NO_x emission rate is for calculation purposes only and is not an enforceable allowable emission rate. **(02/15)**
- 13. This NNSR permit is issued/approved based on the future requirement to obtain and provide 87.3 tpy of NO_x emission reduction credits, as specified in Special Condition No. 14, to offset the 72.69 tpy emission increase for EPN: TC7 authorized by this permit at a ratio of 1.2 to 1. The permit holder shall use the total number of tons of NO_x credits each year as outlined in the table below to offset the NO_x project emission increase for the facility, as follows: **(02/24)**

Calendar Year or Later	Emissions Increase tpy	Credits to be Provided tpy
2023	9.89	11.9
2024	10.78	13.0
2025	11.67	14.0

Calendar Year or Later	Emissions Increase tpy	Credits to be Provided tpy
2026	24.31	29.2
2027	49.46	59.4
2028	58.15	69.8
2029 and thereafter	72.69	87.3

- A. The permit holder shall use 14.0 tpy of NO_x ERCs from TCEQ credit certificate numbers 4013, 4014, 4015, 4016, 4017, and 4018 to offset NO_x project increase for the facility authorized by this permit at a ratio of 1.2 to 1.0 for calendar years 2023, 2024, and 2025.
 - B. The permit holder was approved to use 26.3 tpy of NO_x ERCs from TCEQ credit certificate numbers 4112, 4113, and 4114 to offset the NO_x project increase for the facility authorized by this permit at a ratio of 1.2 to 1.0. A total of 15.2 tpy will satisfy the NO_x project emission increase for the facility through calendar year 2026. The additional 11.1 tpy will be applied towards the Credits to be Provided value for calendar year 2027.
14. The permit holder shall obtain approval from the TCEQ EBT Program for the credits being used and then submit a permit alteration request to the TCEQ Air Permits Division (and copy the TCEQ Regional Office) to identify approved credits by TCEQ credit certificate number. The following options are available: **(08/21)**
- A. Obtain and use NO_x Emission Reduction Credits (ERCs). A completed ERC use application shall be submitted to the TCEQ EBT Program at least 90 days before the year of operation of the facilities covered by this permit. The permit holder shall obtain approval from the TCEQ EBT Program for the credits being used and then submit a permit alteration or amendment request to the TCEQ Air Permits Division (and copy the TCEQ Regional Office) to identify approved credits by TCEQ credit certificate number.
 - B. Obtain and use NO_x Discrete Emission Reduction Credits (DERCs) for each year of authorized operation. The permit holder shall submit a completed DERC intent to use application form by August 1st prior to the continuing of operations each year, and the intent to use must be reviewed and approved by the TCEQ EBT Program for compliance with 30 Texas Administrative Code §101.376(f). Additionally, the permit holder shall submit a permit alteration or amendment request to the TCEQ Air Permits Division (and copy the TCEQ Regional Office) to identify the DERCs by TCEQ DERC certificate number to cover, at a minimum, one year of operation of the permitted facilities.
 - (1) In accordance with 30 Texas Administrative Code §101.372(i) in areas having an ozone season of less than 12 months (as defined in 40 Code of Federal Regulations Part 58, Appendix D), NO_x discrete emission credits generated outside the ozone season may not be used during the ozone season.
 - C. A combination of ERCs and DERCs can be used provided that the total credits satisfy the amounts specified in Special Condition No. 13 and that the appropriate EBT Program usage applications and the appropriate Air Permits Division alteration or amendment applications are submitted. **(08/21)**

Additional Permit Requirements

15. A copy of this permit shall be kept at the plant site and made available at the request of personnel from the TCEQ or the local air pollution control agency with appropriate jurisdiction.
16. The holder of this permit shall physically identify and mark in a conspicuous location all equipment that has the potential of emitting air contaminants as follows:
 - A. The facility identification numbers as submitted to the Emissions Inventory Section of the TCEQ.
 - B. The EPNs as listed on the maximum allowable emission rates table.
17. The holder of this permit shall operate the facilities at this site such that for hazardous air pollutants (HAPs), which have been listed pursuant to § 112(b) of the Federal Clean Air Act:
 - A. Emissions of any single HAP shall not exceed 10 tons per year (tpy).
 - B. Emissions of all HAPs combined shall not exceed 25 tpy. **(09/04)**

Referenced Authorizations

18. The following sources and/or activities are authorized under a Permit by Rule (PBR) by Title 30 Texas Administrative Code Chapter 106 (30 TAC Chapter 106). These lists are not intended to be all inclusive and can be altered without modifications to this permit. **(08/21)**

Authorization	Source or Activity
PBR 106.472	Diesel Fuel Tank No. 2 (EPN: DFT2)

Date: February 23, 2024

Emission Sources - Maximum Allowable Emission Rates

Permit Number 20041, N196M1, and PSDTX1590

This table lists the maximum allowable emission rates and all sources of air contaminants on the applicant's property covered by this permit. The emission rates shown are those derived from information submitted as part of the application for permit and are the maximum rates allowed for these facilities, sources, and related activities. Any proposed increase in emission rates may require an application for a modification of the facilities covered by this permit.

Air Contaminants Data

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates	
			lb/hour	TPY (4)
TC1	Test Cell 1 Gas fuel firing	NO _x	106.9	-
		CO	84.8	-
		VOC	46.6	-
		PM	5.3	-
		PM ₁₀	5.3	-
		PM _{2.5}	5.3	-
		SO ₂	2.0	-
TC1	Test Cell 1 Liquid fuel firing	NO _x	181.5	-
		CO	88.8	-
		VOC	20.4	-
		PM	15.7	-
		PM ₁₀	15.7	-
		PM _{2.5}	15.7	-
		SO ₂	7.5	-
TC1	Test Cell 1 - Annual Emission Rate Gas and Liquid Fuel Firing	NO _x	-	100.2
		CO	-	27.7
		VOC	-	9.4
		PM	-	10.7
		PM ₁₀	-	10.7
		PM _{2.5}	-	10.7
		SO ₂	-	2.9

Emission Sources - Maximum Allowable Emission Rates

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates	
			lb/hour	TPY (4)
TC2	Test Cell 2 Gas Fuel Firing	NO _x	8.7	-
		CO	18.4	-
		VOC	4.7	-
		PM	0.7	-
		PM ₁₀	0.7	-
		PM _{2.5}	0.7	-
		SO ₂	0.4	-
TC2	Test Cell 2 Liquid Fuel Firing	NO _x	13.0	-
		CO	37.0	-
		VOC	4.7	-
		PM	3.5	-
		PM ₁₀	3.5	-
		PM _{2.5}	3.5	-
		SO ₂	1.5	-
TC2	Test Cell 2 – Annual Emission Rates Gas and Liquid Fuel Firing	NO _x	-	8.7
		CO	-	9.2
		VOC	-	0.9
		PM	-	1.9
		PM ₁₀	-	1.9
		PM _{2.5}	-	1.9
		SO ₂	-	0.8

Emission Sources - Maximum Allowable Emission Rates

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates	
			lb/hour	TPY (4)
TC3	Test Cell 3 Gas Fuel Firing	NO _x	80.0	-
		CO	84.8	-
		VOC	13.5	-
		PM	2.5	-
		PM ₁₀	2.5	-
		PM _{2.5}	2.5	-
		SO ₂	1.1	-
TC3	Test Cell 3 Liquid Fuel Firing	NO _x	120.0	-
		CO	45.6	-
		VOC	7.2	-
		PM	15.7	-
		PM ₁₀	15.7	-
		PM _{2.5}	15.7	-
		SO ₂	4.8	-
TC3	Test Cell 3 – Annual Emission Rates Gas and Liquid Fuel Firing	NO _x	-	35.9
		CO	-	19.4
		VOC	-	1.8
		PM	-	10.7
		PM ₁₀	-	10.7
		PM _{2.5}	-	10.7
		SO ₂	-	2.7

Emission Sources - Maximum Allowable Emission Rates

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates	
			lb/hour	TPY (4)
TC4	Test Cell 4 Gas Fuel Firing	NO _x	106.9	-
		CO	84.8	-
		VOC	46.6	-
		PM	5.3	-
		PM ₁₀	5.3	-
		PM _{2.5}	5.3	-
		SO ₂	2.0	-
TC4	Test Cell 4 Liquid Fuel Firing	NO _x	181.5	-
		CO	41.3	-
		VOC	14.3	-
		PM	15.7	-
		PM ₁₀	15.7	-
		PM _{2.5}	15.7	-
		SO ₂	7.5	-
TC4	Test Cell 4 Gas and Liquid Fuel Firing	NO _x	-	100.2
		CO	-	27.7
		VOC	-	9.4
		PM	-	10.7
		PM ₁₀	-	10.7
		PM _{2.5}	-	10.7
		SO ₂	-	2.9

Emission Sources - Maximum Allowable Emission Rates

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates	
			lb/hour	TPY (4)
TC5	Test Cell 5 Gas Fuel Firing	NO _x	192.8	-
		CO	30.0	-
		VOC	8.8	-
		PM	8.5	-
		PM ₁₀	8.5	-
		PM _{2.5}	8.5	-
		SO ₂	3.8	-
TC5	Test Cell 5 Liquid Fuel Firing	NO _x	338.8	-
		CO	30.0	-
		VOC	8.8	-
		PM	12.1	-
		PM ₁₀	12.1	-
		PM _{2.5}	12.1	-
		SO ₂	14.1	-
TC5	Test Cell 5 – Annual Emission Rates Gas and Liquid Fuel Firing	NO _x	-	74.53
		CO	-	25.48
		VOC	-	5.81
		PM	-	7.49
		PM ₁₀	-	7.49
		PM _{2.5}	-	7.49
		SO ₂	-	4.15

Emission Sources - Maximum Allowable Emission Rates

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates	
			lb/hour	TPY (4)
TC6	Test Cell 6 Gas Fuel Firing	NO _x	298.43	-
		CO	26.00	-
		VOC	1.49	-
		PM	4.21	-
		PM ₁₀	4.21	-
		PM _{2.5}	4.21	-
		SO ₂	3.04	-
TC6	Test Cell 6 Liquid Fuel Firing	NO _x	409.53	-
		CO	26.29	-
		VOC	7.50	-
		PM	13.60	-
		PM ₁₀	13.60	-
		PM _{2.5}	13.60	-
		SO ₂	0.35	-
TC6	Test Cell 6 – Annual Emission Rates Gas and Liquid Fuel Firing	NO _x	-	39.78
		CO	-	49.46
		VOC	-	4.03
		PM	-	9.88
		PM ₁₀	-	9.88
		PM _{2.5}	-	9.88
		SO ₂	-	5.24

Emission Sources - Maximum Allowable Emission Rates

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates	
			lb/hour	TPY (4)
TC7	Test Cell 7 Gas Fuel Firing	NO _x	659.34	-
		CO	469.11	-
		VOC	10.69	-
		PM	3.66	-
		PM ₁₀	3.66	-
		PM _{2.5}	3.66	-
		SO ₂	4.92	-
TC7	Test Cell 7 Liquid Fuel Firing	NO _x	989.01	-
		CO	470.11	-
		VOC	10.72	-
		PM	8.22	-
		PM ₁₀	8.22	-
		PM _{2.5}	8.22	-
		SO ₂	0.60	-
TC7	Test Cell 7 – Annual Emission Rates Gas and Liquid Fuel Firing	NO _x	-	24.31
		CO	-	6.04
		VOC	-	0.46
		PM	-	1.53
		PM ₁₀	-	1.53
		PM _{2.5}	-	1.53
		SO ₂	-	1.88

Emission Sources - Maximum Allowable Emission Rates

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates	
			lb/hour	TPY (4)
TC7	Test Cell 7 – Annual Emission Rates Gas and Liquid Fuel Firing – 2027 (5)	NO _x	-	49.46
		CO	-	5.84
		VOC	-	0.46
		PM	-	1.72
		PM ₁₀	-	1.72
		PM _{2.5}	-	1.72
		SO ₂	-	1.71
TC7	Test Cell 7 – Annual Emission Rates Gas and Liquid Fuel Firing – 2028 (6)	NO _x	-	58.15
		CO	-	5.74
		VOC	-	0.47
		PM	-	1.72
		PM ₁₀	-	1.72
		PM _{2.5}	-	1.72
		SO ₂	-	1.67
TC7	Test Cell 7 – Annual Emission Rates (7) Gas and Liquid Fuel Firing – 2029 and thereafter	NO _x	-	72.69
		CO	-	7.17
		VOC	-	0.59
		PM	-	2.15
		PM ₁₀	-	2.15
		PM _{2.5}	-	2.15
		SO ₂	-	2.09

Emission Sources - Maximum Allowable Emission Rates

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates	
			lb/hour	TPY (4)
F1	TC1, TC3-5 Process Fugitives (8)	VOC	0.6	0.3
F2	TC2 Process Fugitives (8)	VOC	0.3	0.1
F3	TC6 Process Fugitives (8)	VOC	0.01	0.01
S1	Oil/Water Separator	VOC	0.1	0.3
S2	TC6 Oil/Water Separator	VOC	0.01	0.05
S3	TC7 Oil/Water Separator	VOC	0.01	0.05
CT1	Cooling Tower	VOC	0.08	0.37
		PM	0.60	2.63
		PM ₁₀	0.15	0.66
		PM _{2.5}	0.01	0.03
		Cl ₂	<0.01	<0.01
CT3	Cooling Tower	VOC	0.1	0.4
		PM	0.60	2.63
		PM ₁₀	0.15	0.66
		PM _{2.5}	0.01	0.03
		Cl ₂	<0.01	<0.01
CT4	TC6 Cooling Tower	VOC	0.08	0.37
		PM	0.06	0.26
		PM ₁₀	0.02	0.09
		PM _{2.5}	<0.01	<0.01
		Cl ₂	<0.01	<0.01

Emission Sources - Maximum Allowable Emission Rates

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates	
			lb/hour	TPY (4)
CT5	TC7 Cooling Tower No. 5	VOC	0.08	0.37
		PM	0.06	0.26
		PM ₁₀	0.02	0.07
		PM _{2.5}	<0.01	<0.01
		Cl ₂	<0.01	<0.01

- (1) Emission point identification - either specific equipment designation or emission point number from plot plan.
(2) Specific point source name. For fugitive sources, use area name or fugitive source name.
(3) NO_x - total oxides of nitrogen
CO - carbon monoxide
VOC - volatile organic compounds as defined in Title 30 Texas Administrative Code § 101.1
PM - total particulate matter, suspended in the atmosphere, including PM₁₀ and PM_{2.5}
PM₁₀ - total particulate matter equal to or less than 10 microns in diameter, including PM_{2.5}
PM_{2.5} - particulate matter equal to or less than 2.5 microns in diameter
SO₂ - sulfur dioxide
Cl₂ - chlorine
(4) Compliance with annual emission limits (tons per year) is based on a 12 month rolling period.
(5) Emission rates for EPN: TC7 are effective for calendar year 2027, and/or for the subsequent calendar year following approval from TCEQ EBT for the NO_x emission credits
(6) Emission rates for EPN: TC7 are effective for calendar year 2028, and/or for the subsequent calendar year following approval from TCEQ EBT for the NO_x emission credits
(7) Emission rates for EPN: TC7 are effective for calendar year 2029 and thereafter, following approval from TCEQ EBT for the NO_x emission credits.
(8) Emission rate is an estimate and is enforceable through compliance with the applicable special condition(s) and permit application representations.

Date: February 23, 2024