

Texas Commission on Environmental Quality

Title V Existing

3999

Site Information (Regulated Entity)

What is the name of the permit area to be authorized?	TEJAS POWER GENERATION UNIT 1
Does the site have a physical address?	Yes
Physical Address	
Number and Street	12100 HIRAM CLARKE RD
City	HOUSTON
State	TX
ZIP	77045
County	HARRIS
Latitude (N) (##.#####)	29.646388
Longitude (W) (-###.#####)	95.451944
Primary SIC Code	4911
Secondary SIC Code	
Primary NAICS Code	221112
Secondary NAICS Code	
Regulated Entity Site Information	
What is the Regulated Entity's Number (RN)?	RN106425242
What is the name of the Regulated Entity (RE)?	TEJAS POWER GENERATION UNIT 1
Does the RE site have a physical address?	Yes
Physical Address	
Number and Street	12100 HIRAM CLARKE RD
City	HOUSTON
State	TX
ZIP	77045
County	HARRIS
Latitude (N) (##.#####)	29.6464
Longitude (W) (-###.#####)	-95.45182
Facility NAICS Code	
What is the primary business of this entity?	ELECTRICITY GENERATION

Customer (Applicant) Information

How is this applicant associated with this site?	Owner Operator
What is the applicant's Customer Number (CN)?	CN605784297
Type of Customer	Corporation
Full legal name of the applicant:	
Legal Name	Tejas Power Generation, LLC
Texas SOS Filing Number	703925023
Federal Tax ID	760626033
State Franchise Tax ID	32000821820
State Sales Tax ID	

Local Tax ID	
DUNS Number	117459757
Number of Employees	0-20
Independently Owned and Operated?	No

Responsible Official Contact

Person TCEQ should contact for questions about this application:

Organization Name	Shell Renewables and Energy Solutions
Prefix	MS
First	Dana
Middle	
Last	McDiffett
Suffix	
Credentials	
Title	VP-Operations
Enter new address or copy one from list:	
Mailing Address	
Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	150 N DAIRY ASHFORD RD # E5
Routing (such as Mail Code, Dept., or Attn:)	
City	HOUSTON
State	TX
ZIP	77079
Phone (###-###-####)	8323370025
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	
E-mail	dana.mcdiffett@shell.com

Designated Representative Contact

Person TCEQ should contact for questions about this application:

Select existing DR contact or enter a new contact.

Organization Name	LEAH GULLY(SHELL RENEWABLE...)
Prefix	SHELL RENEWABLE ASSET MANAGEMENT INTERNATIONAL
First	MS
Middle	LEAH
Last	GULLY
Suffix	
Credentials	
Title	ELECTRICAL ENGINEER
Enter new address or copy one from list:	
Mailing Address	
Address Type	Domestic

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

150 N DAIRY ASHFORD RD

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

City

HOUSTON

State

TX

Zip

77079

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

8323379276

Extension

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

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

E-mail

leah.fairhead@shell.com

Technical Contact

Person TCEQ should contact for questions about this application:

Select existing TC contact or enter a new contact.

JOHN PANDOLPH(TEJAS POWER GEN...)

Organization Name

TEJAS POWER GENERATION LLC

Prefix

MR

First

JOHN

Middle

Last

PANDOLPH

Suffix

Credentials

Title

SENIOR ENVIRONMENTAL SPECIALIST

Enter new address or copy one from list:

Mailing Address

Address Type

Domestic

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

202 PECAN DR

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

City

LEAGUE CITY

State

TX

ZIP

77573

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

2815461630

Extension

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

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

E-mail

john.pandolph@naes.com

Title V General Information - Existing

1) Permit Type:

SOP

2) Permit Latitude Coordinate:

29 Deg 38 Min 47 Sec

3) Permit Longitude Coordinate:

95 Deg 27 Min 7 Sec

4) Is this submittal a new application or an update to an existing application?

Update

4.1. Select the permit/project number for which this update should be applied.

3999-37990

5) Does this application include Acid Rain Program or Cross-State Air Pollution Rule

Yes

requirements?

Title V Attachments Existing

Attach OP-1 (Site Information Summary)

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

Attach OP-ACPS (Application Compliance Plan and Schedule)

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)

[File Properties]

File Name	OP_CRO2_OP-CR02 DM sig.pdf
Hash	631B74EF0FC1B477819C2532902AD843512E131A450AC16714BAE67EFD45761A
MIME-Type	application/pdf

Attach OP-DEL (Delegation of Responsible Official)

Attach Void Request Form

Attach any other necessary information needed to complete the permit.

[File Properties]

File Name	DM OP-CRO1 form SIGNED.pdf
Hash	00C59981D9DBF56F4A906DB873C32A8ECFE29E225C6C85D9351D66728213C8AF
MIME-Type	application/pdf

[File Properties]

File Name	RE_ Working Draft Permit -- FOP O3999_Project 37990 Tejas Power Generation LLC_Tejas Power Generation Unit 1 - Respond by 7_23_2025.pdf
Hash	2CC7B6E3F1FBDB469A044390743F9E98F753EF804302B29B021AB05B59309333

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

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 Dana Mcdiffett, the owner of the STEERS account ER115250.
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 3999.
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: Dana Mcdiffett OWNER OPERATOR

Account Number:	ER115250
Signature IP Address:	170.85.101.93
Signature Date:	2025-08-08
Signature Hash:	DACDBB8B634A770DD9CC47F3A1D89EB0A550C5F4146F0093694326B13F29837D
Form Hash Code at time of Signature:	179F321229B138C18F124FA14D5BEEE3C662C95FCE4540F79980155D55BD0D51

Certification

I certify that I am the Designated Representative for this application and am authorized to make this submission on behalf of the owners and operators of the source or units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

1. I am Dana Mcdiffett, the owner of the STEERS account ER115250.
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.
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OWNER OPERATOR Signature: Dana Mcdiffett OWNER OPERATOR

Account Number:	ER115250
Signature IP Address:	170.85.101.93
Signature Date:	2025-08-08
Signature Hash:	DACDBB8B634A770DD9CC47F3A1D89EB0A550C5F4146F0093694326B13F29837D
Form Hash Code at time of Signature:	179F321229B138C18F124FA14D5BEEE3C662C95FCE4540F79980155D55BD0D51

Submission

Reference Number:	The application reference number is 803012
Submitted by:	The application was submitted by ER115250/Dana Mcdiffett
Submitted Timestamp:	The application was submitted on 2025-08-08 at 13:04:00 CDT
Submitted From:	The application was submitted from IP address 170.85.101.93
Confirmation Number:	The confirmation number is 670225
Steers Version:	The STEERS version is 6.92
Permit Number:	The permit number is 3999

Additional Information

Application Creator: This account was created by John S Pandolph

Form OP-CRO2
Change of Responsible Official Information
Federal Operating Permit Program

The Texas Commission on Environmental Quality (TCEQ) shall be notified of a new appointment or administrative information change (e.g., address, phone number, title) for a Responsible Official (RO), Designated Representative (DR), or Alternate Designated Representative (ADR) in the next submittal. This form satisfies the requirements for notification (a revised Certificate of Representation must also be submitted to the U.S. Environmental Protection agency for changes in the DR and ADR). After the initial submittal, if there is a change of Duly Authorized Representative (DAR) appointment or administrative information changes for the DAR, include a revised Form OP-DEL (Delegation of Responsible Official) with the next submittal to TCEQ.

I. Identifying Information
Account No.: HG-A196-N
Regulated Entity Number: RN 106425242
Customer Reference Number: CN 605784297
Permit Number: O-3999
Area Name: Tejas Power Generation Unit 1
Company: Tejas Power Generation LLC
II. Change Type
Action Type: ☒ New Appointment ☐ Administrative Information Change
Contact Type (only one response accepted per form): ☒ Responsible Official ☐ Designated Representative (<i>Acid Rain Program and/or CSAPR sources only</i>) ☐ Alternate Designated Representative (<i>Acid Rain Program and/or CSAPR sources only</i>)

Form OP-CRO2
Change of Responsible Official Information
Federal Operating Permit Program

III. Responsible Official/Designated Representative/Alternate Designated Representative Information
Conventional Title:
☐ Mr.
☐ Mrs.
☒ Ms.
☐ Dr.
Name (Driver's License/STEERS): Dana McDiffett
Title: VP-Operations
Appointment Effective Date: 07/11/25
Telephone Number: 832-337-0025
Fax Number.:
Company Name: Shell Renewables and Energy Solutions
Mailing Address: 150 Dairy Ashford E5
City: Houston
State: Texas
ZIP Code: 77079
Email Address: dana.mcdiffett@shell.com

Form OP-CRO2
Change of Responsible Official Information
Federal Operating Permit Program

IV. Certification of Truth, Accuracy, and Completeness

This certification does not extend to information, which is designated by TCEQ as information for reference only.

I, Dana McDiffett, certify that based on information and belief formed Reasonable inquiry, the statement and information stated above are true, accurate, and complete.

Signature: _____

Signature Date: July 16, 2025

Form OP-CRO1
Certification by Responsible Official
Federal Operating Permit Program
Texas Commission on Environmental Quality

All initial issuance, revision, renewal, and reopening permit application submittals requiring certification must be addressed using this form. Updates to site operating permit (SOP) and temporary operating permit (TOP) applications, other than public notice verification materials, must be certified prior to authorization of public notice or start of public announcement. Updates to general operating permit (GOP) applications must be certified prior to receiving an authorization to operate under a GOP.

I. Identifying Information
RN: RN106425242
CN: CN605784297
Account No.: HG-A196-N
Permit No.: O-3999
Project No.: 37990
Area Name: Tejas Power Generation Unit 1
Company Name: Tejas Power Generation LLC
II. Certification Type <i>(Please mark appropriate box)</i>
☒ Responsible Official Representative ☐ Duly Authorized Representative
III. Submittal Type <i>(Please mark appropriate box) (Only one response can be accepted per form)</i>
☐ SOP/TOP Initial Permit Application ☐ Permit Revision, Renewal, or Reopening
☐ GOP Initial Permit Application ☒ Update to Permit Application
☐ Other:

Form OP-CRO1
Certification by Responsible Official
Federal Operating Permit Program
Texas Commission on Environmental Quality

IV. Certification of Truth

This certification does not extend to information which is designated by TCEQ as information for reference only.

I, Dana McDiffett certify that I am the Responsible Official (RO)
(Certifier Name printed or typed) *(RO or DAR)*

and that, based on information and belief formed after reasonable inquiry, the statements and information dated during the time period or on the specific date(s) below, are true, accurate, and complete:

Note: Enter Either a Time Period or Specific Date(s) for each certification. This section must be completed. The certification is not valid without documentation date(s).

Time Period: From 07/09/2025 to 07/25/2025
(Start Date) *(End Date)*

Specific Dates: _____
(Date 1) *(Date 2)* *(Date 3)* *(Date 4)*

(Date 5) *(Date 6)*

Signature: Dana McDiffett Signature Date: 08/07/25

Title: Vice President of Operations.

From: [Tusar Swami](#)
To: [Carolyn Thomas](#)
Cc: [APIRT](#)
Subject: FW: Working Draft Permit -- FOP O3999/Project 37990, Tejas Power Generation LLC/Tejas Power Generation Unit 1 - Respond by 8/12/2025
Date: Tuesday, August 19, 2025 10:42:00 AM
Attachments: [OP-1 rev1.pdf](#)

Carolyn:

Good morning. Please see attached. They are making some changes to OP-1

1. II.D. Pollutants – Please add VOC and CO
2. XI. Public Notice Place and Contact information.

Sincerely,

Tusar Swami, P.E. (x1581)
Permit Reviewer - Title V

From: Benitez, Clarissa <Clarissa.Benitez@naes.com>
Sent: Tuesday, August 19, 2025 10:13 AM
To: Tusar Swami <tusar.swami@tceq.texas.gov>
Cc: Massari, Melissa <Melissa.Massari@naes.com>; Pandolph, John <John.Pandolph@naes.com>
Subject: RE: Working Draft Permit -- FOP O3999/Project 37990, Tejas Power Generation LLC/Tejas Power Generation Unit 1 - Respond by 8/12/2025

Hi Mr. Swami,
Please find the OP-1 form, as you requested.

Let me know if you need anything else to keep this project moving forward,

Regards,

Clarissa Benitez, P.E. | Environmental Specialist | Cell Phone (281-795-6658) | NAES Corporation |
www.naes.com

**Federal Operating Permit Program
Site Information Summary
Form OP-1 (Page 1)
Texas Commission on Environmental Quality**

Please print or type all information. Direct any questions regarding this application form to the Air Permits Division at (512) 239-1250 or to the Texas Commission on Environmental Quality, Office of Air, Air Permits Division (MC 163), P.O. Box 13087, Austin, Texas 78711-3087.

I. Company Identifying Information
A. Company Name:
B. Customer Reference Number (CN): CN
C. Submittal Date (mm/dd/yyyy):
II. Site Information
A. Site Name:
B. Regulated Entity Reference Number (RN): RN
C. Indicate affected state(s) required to review permit application: <i>(Check the appropriate box[es].)</i>
☐ AR ☐ CO ☐ KS ☐ LA ☐ NM ☐ OK ☐ N/A
D. Indicate all pollutants for which the site is a major source based on the site's potential to emit: <i>(Check the appropriate box[es].)</i>
☐ VOC ☐ NO _x ☐ SO ₂ ☐ PM ₁₀ ☐ CO ☐ Pb ☐ HAPS
Other:
E. Is the site a non-major source subject to the Federal Operating Permit Program? ☐ YES ☐ NO
F. Is the site within a local program area jurisdiction? ☐ YES ☐ NO
G. Will emissions averaging be used to comply with any Subpart of 40 CFR Part 63? ☐ YES ☐ NO
H. Indicate the 40 CFR Part 63 Subpart(s) that will use emissions averaging:
III. Permit Type
A. Type of Permit Requested: <i>(Select only one response)</i>
☐ Site Operating Permit (SOP) ☐ Temporary Operating Permit (TOP) ☐ General Operating Permit (GOP)

**Federal Operating Permit Program
Site Information Summary
Form OP-1 (Page 2)
Texas Commission on Environmental Quality**

IV. Initial Application Information <i>(Complete for Initial Issuance Applications Only.)</i>
A. Is this submittal an abbreviated or a full application? ☐ Abbreviated ☐ Full
B. If this is a full application, is the submittal a follow-up to an abbreviated application? ☐ YES ☐ NO
C. If this is an abbreviated application, is this an early submittal for a combined SOP and Acid Rain permit? ☐ YES ☐ NO
D. Has an electronic copy of this application been submitted (or is being submitted) to EPA? (Refer to the form instructions for additional information.) ☐ YES ☐ NO
V. Confidential Information
A. Is confidential information submitted in conjunction with this application? ☐ YES ☐ NO
VI. Responsible Official (RO) Identifying Information
RO Name Prefix: (☐ Mr. ☐ Mrs. ☐ Ms. ☐ Dr.)
RO Full Name:
RO Title:
Employer Name:
Mailing Address:
City:
State:
ZIP Code:
Territory:
Country:
Foreign Postal Code:
Internal Mail Code:
Telephone No.:
Fax No.:
Email:

**Federal Operating Permit Program
Site Information Summary
Form OP-1 (Page 3)
Texas Commission on Environmental Quality**

VII. Technical Contact Identifying Information <i>(Complete if different from RO.)</i>
Technical Contact Name Prefix: (☐ Mr. ☐ Mrs. ☐ Ms. ☐ Dr.)
Technical Contact Full Name:
Technical Contact Title:
Employer Name:
Mailing Address:
City:
State:
ZIP Code:
Territory:
Country:
Foreign Postal Code:
Internal Mail Code:
Telephone No.:
Fax No.:
Email:
VIII. Reference Only Requirements <i>(For reference only.)</i>
A. State Senator:
B. State Representative:
C. Has the applicant paid emissions fees for the most recent agency fiscal year (Sept. 1 - August 31)? ☐ YES ☐ NO ☐ N/A
D. Is the site subject to bilingual notice requirements pursuant to 30 TAC § 122.322? ☐ YES ☐ NO
E. Indicate the alternate language(s) in which public notice is required:

**Federal Operating Permit Program
Site Information Summary
Form OP-1 (Page 4)
Texas Commission on Environmental Quality**

IX. Off-Site Permit Request <i>(Optional for applicants requesting to hold the FOP and records at an off-site location.)</i>
A. Office/Facility Name:
B. Physical Address:
City:
State:
ZIP Code:
Territory:
Country:
Foreign Postal Code:
C. Physical Location:
D. Contact Name Prefix: (☐ Mr. ☐ Mrs. ☐ Ms. ☐ Dr.)
Contact Full Name:
E. Telephone No.:
X. Application Area Information
A. Area Name:
B. Physical Address:
City:
State:
ZIP Code:
C. Physical Location:
D. Nearest City:
E. State:
F. ZIP Code:

**Federal Operating Permit Program
Site Information Summary
Form OP-1 (Page 5)
Texas Commission on Environmental Quality**

X. Application Area Information (continued)
G. Latitude (nearest second):
H. Longitude (nearest second):
I. Are there any emission units that were not in compliance with the applicable requirements identified in the application at the time of application submittal? ☐ YES ☐ NO
J. Indicate the estimated number of emission units in the application area:
K. Are there any emission units in the application area subject to the Acid Rain Program? ☐ YES ☐ NO
XI. Public Notice (Complete this section for SOP Applications and Acid Rain Permit Applications only.)
A. Name of a public place to view application and draft permit:
B. Physical Address:
City:
ZIP Code:
C. Contact Person (Someone who will answer questions from the public during the public notice period):
Contact Name Prefix: (☐ Mr. ☐ Mrs. ☐ Ms. ☐ Dr.):
Contact Person Full Name:
Contact Mailing Address:
City:
State:
ZIP Code:
Territory:
Country:
Foreign Postal Code:
Internal Mail Code:
Telephone No.:

**Federal Operating Permit Program
Site Information Summary
Form OP-1 (Page 7)
Texas Commission on Environmental Quality**

Complete Sections XIII and XIV for Acid Rain Permit and CSAPR applications only. Please include a copy of the Certificate of Representation submitted to EPA.

XIV. Alternate Designated Representative (ADR) Identifying Information

ADR Name Prefix: (☐ Mr. ☐ Mrs. ☐ Ms. ☐ Dr.)

ADR Full Name:

ADR Title:

Employer Name:

Mailing Address:

City:

State:

ZIP Code:

Territory:

Country:

Foreign Postal Code:

Internal Mail Code:

Telephone No.:

Fax No.:

Email:

**Federal Operating Permit Program
Site Information Summary
Form OP-1 (Page 6)
Texas Commission on Environmental Quality**

XII. 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 Attorney General on behalf of the TCEQ are paid in accordance with the "Delinquent Fee and Penalty Protocol."

Complete Sections XIII and XIV for Acid Rain Permit and CSAPR applications only. Please include a copy of the Certificate of Representation submitted to EPA.

XIII. Designated Representative (DR) Identifying Information

DR Name Prefix: (☐ Mr. ☐ Mrs. ☐ Ms. ☐ Dr.)

DR Full Name:

DR Title:

Employer Name:

Mailing Address:

City:

State:

ZIP Code:

Territory:

Country:

Foreign Postal Code:

Internal Mail Code:

Telephone No.:

Fax No.:

Email:

From: [Tusar Swami](#)
To: [Pandolph, John](#); [Benitez, Clarissa](#)
Cc: [Joshua.Kimmel@shell.com](#); [Gully, Leah L SRAMI-IGN/X/A/C](#); [Massari, Melissa](#)
Subject: RE: Working Draft Permit -- FOP O3999/Project 37990, Tejas Power Generation LLC/Tejas Power Generation Unit 1 - Respond by 7/23/2025
Date: Wednesday, July 23, 2025 9:21:31 AM
Attachments: [image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)

WARNING: This email originated from outside your organization.

Do not click links or open attachments unless you recognize the sender and know the contents are safe.
If you have **ANY** reason to doubt the authenticity of this message, contact IT before you open or click on anything.

Good morning, John:

Submittals through STEERS are auto certified, so no wet signature is required by RO or DAR. OP-CRO1 has a period which indicates the duration. In our case the start date is when I sent the working draft to the current date. So, an OP-CRO1 with boxes filled in can be uploaded.

Sincerely,

Tusar Swami, P.E.

Texas Commission on Environmental Quality

OA/APD/Operating Permits Section

12100 Park 35 Circle, Bldg. C, Austin, TX 78753

Mail: MC-163, P. O. Box 13087, Austin, TX 78711-3087

Phone: 512/239-1581 Fax: 512/239-1400

Email: tusar.swami@tceq.texas.gov



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

From: Pandolph, John <John.Pandolph@naes.com>
Sent: Wednesday, July 23, 2025 8:26 AM
To: Tusar Swami <tusar.swami@tceq.texas.gov>; Benitez, Clarissa <Clarissa.Benitez@naes.com>
Cc: Joshua.Kimmel@shell.com; Gully, Leah L SRAMI-IGN/X/A/C <Leah.Fairhead@shell.com>; Massari, Melissa <Melissa.Massari@naes.com>
Subject: RE: Working Draft Permit -- FOP O3999/Project 37990, Tejas Power Generation LLC/Tejas Power Generation Unit 1 - Respond by 7/23/2025

Mr. Swami,

I'm sure you got an Out of Office message from Clarissa. I will review the Draft again and the submit an acknowledgement regarding the draft through STEERS. As the RO or DAR will have to sign and submit the notification, an OP-CRO1 should not be required. Please let me know if this is correct.

Regards,

John S. Pandolph

John S. Pandolph | Sr. Environmental Specialist | Office/Cell 281-546-1630 | NAES Corporation | www.naes.com

From: Tusar Swami <tusar.swami@tceq.texas.gov>
Sent: Tuesday, July 22, 2025 6:37 PM
To: Benitez, Clarissa <Clarissa.Benitez@naes.com>
Cc: Joshua.Kimmel@shell.com; Pandolph, John <John.Pandolph@naes.com>; Gully, Leah L SRAMI-IGN/X/A/C <Leah.Fairhead@shell.com>
Subject: RE: Working Draft Permit -- FOP O3999/Project 37990, Tejas Power Generation LLC/Tejas Power Generation Unit 1 - Respond by 7/23/2025

WARNING: This email originated from outside your organization.

Do not click links or open attachments unless you recognize the sender and know the contents are safe.
If you have **ANY** reason to doubt the authenticity of this message, contact IT before you open or click on anything.

Clarissa:

Please see attached the updated draft. Thanks for catching the error. The duplication/unwanted languages were removed. Please accept draft and send an OP-CRO1 for the duration of 7/9/2025 through the current date. You may submit it through STEERS and let me know. I am proceeding with the preparation of Public Announcement package. As always thank you.

Sincerely,

Tusar Swami, P.E.

Texas Commission on Environmental Quality

OA/APD/Operating Permits Section

12100 Park 35 Circle, Bldg. C, Austin, TX 78753

Mail: MC-163, P. O. Box 13087, Austin, TX 78711-3087

Phone: 512/239-1581 Fax: 512/239-1400

Email: tusar.swami@tceq.texas.gov



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

From: Benitez, Clarissa <Clarissa.Benitez@naes.com>
Sent: Friday, July 18, 2025 11:53 AM
To: Tusar Swami <tusar.swami@tceq.texas.gov>

Hi Mr. Swami,

I am responding to your request for a review of the draft Title V permit on behalf of Tejas Power Generation.

We are in agreement with the requirements that were added to the permit; however, we noticed some errors within the document that need to be corrected. In 3 different places, a Special Term and Condition was added where it did not need to be added as it was a repeat of the previous condition. I am going to list these out with pasted excerpts from the permit so that you can see what I am referring to:

1. Special Term and Condition 18 and 19:

18. For unit GT-1, GT-2, GT-3 and GT-4 (identified in the Certificate of Representation as unit CT-1, CT-2, CT-3 and CT-4), located at the affected source identified by ORIS/Facility code 60468, the designated representative and the owner or operator, as applicable, shall comply with the following Acid Rain Permit requirements.
19. For units (insert unit ID numbers for units subject to Acid Rain) (identified in the Certificate of Representation as units (insert EPA unit ID numbers)), located at the affected source identified by ORIS/Facility/Plant code (insert the ORIS/Facility/Plant ID), the designated representative and the owner or operator, as applicable, shall comply with the following Acid Rain Permit requirements.

2. Special Term and Condition 20 and 21:
~~Cross State Air Pollution Rule (CSAPR) Trading Program Requirements~~

20. For units GT-1, GT-2, GT-3 and GT-4 (identified in the Certificate of Representation as units CT-1, CT-2, CT-3 and CT-4), located at the site identified by Plant code/ORIS/Facility code 60468, the designated representative and the owner or operator, as applicable, shall comply with the following CSAPR requirements.
21. For units [insert unit ID numbers for units subject to CSAPR] (identified in the Certificate of Representation as units [insert EPA unit ID numbers]), located at the site identified by Plant code/ORIS/Facility code [insert Plant/ORIS/Facility ID], the designated representative and the owner or operator, as applicable, shall comply with the following CSAPR requirements.

3. Special Term and Condition 21.B.(i)(1) and 21.B.(i)(2):

- (i) The CSAPR subject unit(s), and the unit-specific monitoring provisions at this source, are identified in the following paragraph(s). These unit(s) are subject to the requirements for the CSAPR NO_x Ozone Season Group 2 Trading Program.
 - (1) For units GT-1, GT-2, GT-3 and GT-4, the owners and operators shall comply with the continuous emission monitoring system or systems (CEMS) requirements pursuant to 40 CFR Part 75, Subpart H for NO_x, and with the excepted monitoring system requirements for gas- and oil-fired units pursuant to 40 CFR Part 75, Appendix D for heat input.
 - (2) For unit(s) [insert unit ID numbers for units that are complying with this provision], the owners and operators shall comply with the continuous emission monitoring system or systems (CEMS) requirements pursuant to 40 CFR Part 75, Subpart H for NO_x, and with the excepted monitoring system requirements for gas- and oil-fired units pursuant to 40 CFR Part 75, Appendix D for heat input.

Please let me know if you need any clarification or additional information from us.

Thank you,

Clarissa Benitez, P.E.
Environmental Specialist

Cell: 281-795-6658
Clarissa.Benitez@naes.com



NAES Corporation
1180 NW Maple St. Suite 200, Issaquah, WA 98027

www.naes.com

From: Tusar Swami <tusar.swami@tceq.texas.gov>
Sent: Wednesday, July 9, 2025 3:20 PM
To: Gully, Leah L SRAMI-DRN/GM/E <Leah.Fairhead@shell.com>
Cc: Pandolph, John <john.pandolph@naes.com>
Subject: Working Draft Permit -- FOP O3999/Project 37990, Tejas Power Generation LLC/Tejas Power Generation Unit 1 - Respond by 7/23/2025

Think Secure. This email is from an external source.

Leah:

Good afternoon. I have conducted a technical review of minor *revision* application for Tejas Power Generation LLC/Tejas Power Generation Unit 1. 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 dated March 31, 2025. As per the request

For Unit IDs G-2, G-3, and G-4 – 40 CFR Subpart TTTTa requirements are added. Please note that these requirements are reviewed manually and approved by our Tech Specialist which may slightly differ from what was submitted. Also 40 CFR Part 60 Subpart TTTT requirements are removed for these units.

Please review the WDP and submit to me any comments you have on the working draft permit by **July 23rd, 2025**.

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. A quick acknowledgement to this email will be very much appreciated. Thank you for your cooperation.

Sincerely,

Tusar Swami, P.E.

Texas Commission on Environmental Quality
OA/APD/Operating Permits Section
12100 Park 35 Circle, Bldg. C, Austin, TX 78753
Mail: MC-163, P. O. Box 13087, Austin, TX 78711-3087
Phone: 512/239-1581 Fax: 512/239-1400
Email: tusar.swami@tceq.texas.gov



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

From: [Tusar Swami](#)
To: john.pandolph@naes.com
Cc: Clarissa.Benitez@naes.com
Subject: Technical Review -- FOP O3999/Project 37990, Tejas Power Generation LLC/Tejas Power Generation Unit 1
Date: Thursday, May 8, 2025 2:14:00 PM

John:

Good afternoon. I have been assigned to the Federal Operating Permit (FOP) minor revision application of Permit No. O3999 for Tejas Power Generation LLC/Tejas Power Generation Unit 1. This application has been assigned Project No. 37990. 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,

Tusar Swami, P.E.

Texas Commission on Environmental Quality

OA/APD/Operating Permits Section

12100 Park 35 Circle, Bldg. C, Austin, TX 78753

Mail: MC-163, P. O. Box 13087, Austin, TX 78711-3087

Phone: 512/239-1581 Fax: 512/239-1400

Email: tusar.swami@tceq.texas.gov



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Carolyn Thomas

From: Carolyn Thomas
Sent: Wednesday, April 9, 2025 2:54 PM
To: Benitez, Clarissa
Cc: Pandolph, John; Gully, Leah L SRAMI-IGN/X/A/C; Dana.Lipinsky@shell.com; APIRT
Subject: RE: STEERS/TV 37990 / 3999 - STREAMLINE - Tejas Power

Ms. Clarissa,

The permit application has been administratively completed and transferred to technical review.

Thank you,
Carolyn Thomas
Air Permits Initial Review Team
Air Permits Division, MC 161
Office of Air Texas Commission on Environmental Quality
Phone: (512) 239-5127
Fax: (512) 233-0973
E-mail: carolyn.thomas@tceq.texas.gov
Web site: www.tceq.texas.gov
Please consider whether it is necessary to print this e-mail.
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-----Original Message-----

From: Benitez, Clarissa <Clarissa.Benitez@naes.com>
Sent: Wednesday, April 9, 2025 2:33 PM
To: Carolyn Thomas <Carolyn.Thomas@tceq.texas.gov>
Cc: Pandolph, John <John.Pandolph@naes.com>; Gully, Leah L SRAMI-IGN/X/A/C <Leah.Fairhead@shell.com>; Dana.Lipinsky@shell.com
Subject: RE: STEERS/TV 37990 / 3999 - STREAMLINE - Tejas Power

Hi Ms. Thomas,
Please see attached.

Let me know if you need any additional information.

Thank you,
Clarissa Benitez, P.E. | Environmental Specialist | Cell Phone (281-795-6658) | NAES Corporation |
<https://nam11.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.naes.com%2F&data=05%7C02%7CCarolyn.Thomas%40tceq.texas.gov%7C6e69f50b6b364bdf96bf08dd779d66fe%7C871a83a4a1ce4b7a81563bcd93a08fba%7C0%7C0%7C638798241043906949%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIlwLjAuMDAwMCIslIAiOiJXaW4zMilslkFOljoiTWFpbCIsIlIdUljoyfQ%3D%3D%7C0%7C%7C%7C&sdata=HGlfUW%2BxrzL47et3ITJdX%2BD8u%2BmBz8K4MtCuq%2B2bfcE%3D&reserved=0>

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

From: Carolyn Thomas <Carolyn.Thomas@tceq.texas.gov>
Sent: Wednesday, April 9, 2025 1:05 PM
To: Benitez, Clarissa <Clarissa.Benitez@naes.com>
Cc: Pandolph, John <John.Pandolph@naes.com>
Subject: RE: STEERS/TV 37990 / 3999 - STREAMLINE - Tejas Power

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Ms. Clarissa,

"Update to permit application. Thank you for asking.

Thank you,
Carolyn Thomas
Air Permits Initial Review Team
Air Permits Division, MC 161
Office of Air Texas Commission on Environmental Quality
Phone: (512) 239-5127
Fax: (512) 233-0973
E-mail: carolyn.thomas@tceq.texas.gov

Web site:

<https://nam11.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.tceq.texas.gov%2F&data=05%7C02%7CCarolyn.Thomas%40tceq.texas.gov%7C6e69f50b6b364bdf96bf08dd779d66fe%7C871a83a4a1ce4b7a81563bcd93a08fba%7C0%7C0%7C638798241043932116%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIlwLjAuMDAwMCIslIAiOiJXaW4zMilslkFOLjoiTWfPbClslldUljoyfQ%3D%3D%7C0%7C%7C%7C&sdata=ywP9TGUX2YL1luZ%2BbSjleVuWyWV2P11AlSseXy9qCB8%3D&reserved=0>

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

From: Benitez, Clarissa <Clarissa.Benitez@naes.com>
Sent: Wednesday, April 9, 2025 1:01 PM
To: Carolyn Thomas <Carolyn.Thomas@tceq.texas.gov>
Cc: Pandolph, John <John.Pandolph@naes.com>

Subject: RE: STEERS/TV 37990 / 3999 - STREAMLINE - Tejas Power

Hi Ms. Thomas,

Yes ma'am, I am working on this now. Quick question for you - for Submittal Type under Section III., should I choose 'Update to Permit Application' or 'Permit Revision or Renewal'?

Thank you,

Clarissa Benitez, P.E. | Environmental Specialist | Cell Phone (281-795-6658) | NAES Corporation |
<https://nam11.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.naes.com%2F&data=05%7C02%7CCarolyn.Thomas%40tceq.texas.gov%7C6e69f50b6b364bdf96bf08dd779d66fe%7C871a83a4a1ce4b7a81563bcd93a08fba%7C0%7C0%7C638798241043972890%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIlwLjAuMDAwMCIslIAiOiJXaW4zMlslkFOljoitWFpbCIsIlIdUljoyfQ%3D%3D%7C0%7C%7C%7C&sdata=VyAO9cvRTnMZ%2Ft6E%2BIsV%2FOv8IBTh3HyObv1yeNnOgQk%3D&reserved=0>

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

From: Carolyn Thomas <Carolyn.Thomas@tceq.texas.gov>

Sent: Wednesday, April 9, 2025 8:28 AM

To: Benitez, Clarissa <Clarissa.Benitez@naes.com>

Cc: Dana.Lipinsky@shell.com; Gully, Leah L SRAMI-IGN/X/A/C <Leah.Fairhead@shell.com>; Pandolph, John <John.Pandolph@naes.com>; APIRT <apirt@tceq.texas.gov>

Subject: RE: STEERS/TV 37990 / 3999 - STREAMLINE - Tejas Power

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Good morning Clarissa,

Could you make it a priority to take care of this today?

Your attention to this is greatly appreciated.

Thank you,

Carolyn Thomas

Air Permits Initial Review Team

Air Permits Division, MC 161

Office of Air Texas Commission on Environmental Quality

Phone: (512) 239-5127

Fax: (512) 233-0973

E-mail: carolyn.thomas@tceq.texas.gov

Web site:

<https://nam11.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.tceq.texas.gov%2F&data=05%7C02%7CCarolyn.Thomas%40tceq.texas.gov%7C6e69f50b6b364bdf96bf08dd779d66fe%7C871a83a4a1ce4b7a81563bcd93a08fba%7C0%7C0%7C638798241043992592%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIlwLjAuMDAwMCIslIAiOiJXaW4zMlslkFOljoitWFpbCIsIlIdUljoyfQ%3D%3D%7C0%7C%7C%7C&sdata=t%2FokUV8%2FnCtyxiY2MMXtz23LHEvtEHb2H15CCBSZOCI%3D&reserved=0>

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%7C02%7CCarolyn.Thomas%40tceq.texas.gov%7C6e69f50b6b364bdf96bf08dd779d66fe%7C871a83a4a1ce4b7a81563bcd93a08fba%7C0%7C0%7C638798241044012999%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIslIAiOiJXaW4zMilslkFOljoiTWFpbCIsIldUljoyfQ%3D%3D%7C0%7C%7C%7C&sdata=xISOJtEecy9ql9kc4nazg%2B7%2BZoO8ly%2FI%2FFtuzztD%2BWY%3D&reserved=0

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

From: Carolyn Thomas

Sent: Tuesday, April 8, 2025 3:27 PM

To: Benitez, Clarissa <Clarissa.Benitez@naes.com>

Cc: Dana.Lipinsky@shell.com; Gully, Leah L SRAMI-IGN/X/A/C <Leah.Fairhead@shell.com>; Pandolph, John <John.Pandolph@naes.com>; APIRT <apirt@tceq.texas.gov>

Subject: RE: STEERS/TV 37990 / 3999 - STREAMLINE - Tejas Power

Clarisa,

I would like to emphasize that the certification of acid rain has not been established. As such, it remains uncertified. To move forward, please send CRO1 Form 10009 acid portion directly to my attention. It's needed because the question in the COR was answered "no" for acid rain.

Your cooperation in this matter is greatly appreciated.

Thank you,

Carolyn Thomas

Air Permits Initial Review Team

Air Permits Division, MC 161

Office of Air Texas Commission on Environmental Quality

Phone: (512) 239-5127

Fax: (512) 233-0973

E-mail: carolyn.thomas@tceq.texas.gov

Web site:

<https://nam11.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.tceq.texas.gov%2F&data=05%7C02%7CCarolyn.Thomas%40tceq.texas.gov%7C6e69f50b6b364bdf96bf08dd779d66fe%7C871a83a4a1ce4b7a81563bcd93a08fba%7C0%7C0%7C638798241044032149%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIslIAiOiJXaW4zMilslkFOljoiTWFpbCIsIldUljoyfQ%3D%3D%7C0%7C%7C%7C&sdata=DxPDuplls7zSPfYzmqBIPZlf2Kb3MGABdgWESXlr%2B0Y%3D&reserved=0>

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Form OP-CRO1
Certification by Responsible Official
Federal Operating Permit Program
Texas Commission on Environmental Quality

All initial issuance, revision, and renewal permit application submittals requiring certification must be accompanied by this form. Updates to acid rain or CSAPR (other than public notice verification materials) must be certified prior to authorization of public notice for the draft permit.

I. Identifying Information	
RN: 106425242	
CN: 605784297	
Account No.: HG-196-N	
Permit No.: O-3999	
Project No.: 37990	
Area Name: Tejas Power Generation Unit 1	
Company Name: Tejas Power Generation, L.L.C.	
II. Certification Type <i>(Please mark appropriate box)</i>	
☒ Designated Representative	☐ Alternated Designated Representative
III. Requirement and Submittal Type <i>(Please mark the appropriate boxes for each row)</i>	
Requirement: ☒ Acid Rain Permit	☐ CSAPR
Submittal Type: ☐ Initial Permit Application	☒ Update to Permit Application
☐ Permit Revision or Renewal	☐ Other:

Form OP-CRO1
Certification by Responsible Official
Federal Operating Permit Program
Texas Commission on Environmental Quality

IV. Certification of Truth

I, Leah Gully certify that I am the DR

(Certifier Name printed or typed)

(RO or DAR)

am authorized to make this submission on behalf of the owners and operators of the source or units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment. The above certification is for the statements and information dated during the time period or on the specific date(s) below:

Note: Enter Either a Time Period or Specific Date(s) for each certification. This section must be completed. The certification is not valid without documentation date(s).

Time Period: From _____ to _____

(Start Date)

(End Date)

Specific Dates: 03/31/2025

(Date 1)

(Date 2)

(Date 3)

(Date 4)

(Date 5)

(Date 6)

Signature: _____

Signature Date: 4/9/25

Title: Electrical Engineer

Texas Commission on Environmental Quality

Title V Existing

3999

Site Information (Regulated Entity)

What is the name of the permit area to be authorized?	TEJAS POWER GENERATION UNIT 1
Does the site have a physical address?	Yes
Physical Address	
Number and Street	12100 HIRAM CLARKE RD
City	HOUSTON
State	TX
ZIP	77045
County	HARRIS
Latitude (N) (##.#####)	29.646388
Longitude (W) (-###.#####)	95.451944
Primary SIC Code	4911
Secondary SIC Code	
Primary NAICS Code	221112
Secondary NAICS Code	
Regulated Entity Site Information	
What is the Regulated Entity's Number (RN)?	RN106425242
What is the name of the Regulated Entity (RE)?	TEJAS POWER GENERATION UNIT 1
Does the RE site have a physical address?	Yes
Physical Address	
Number and Street	12100 HIRAM CLARKE RD
City	HOUSTON
State	TX
ZIP	77045
County	HARRIS
Latitude (N) (##.#####)	29.6464
Longitude (W) (-###.#####)	-95.45182
Facility NAICS Code	
What is the primary business of this entity?	ELECTRICITY GENERATION

Customer (Applicant) Information

How is this applicant associated with this site?	Owner Operator
What is the applicant's Customer Number (CN)?	CN605784297
Type of Customer	Corporation
Full legal name of the applicant:	
Legal Name	Tejas Power Generation, LLC
Texas SOS Filing Number	703925023
Federal Tax ID	760626033
State Franchise Tax ID	32000821820
State Sales Tax ID	

Local Tax ID	
DUNS Number	117459757
Number of Employees	0-20
Independently Owned and Operated?	No

Responsible Official Contact

Person TCEQ should contact for questions about this application:

Organization Name	TEJAS POWER GENERATION LLC
Prefix	MR
First	GLENN
Middle	
Last	WRIGHT
Suffix	
Credentials	
Title	PRESIDENT AND CHIEF EXECUTIVE OFFICER

Enter new address or copy one from list:

Mailing Address	
Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	1000 MAIN ST
Routing (such as Mail Code, Dept., or Attn:)	12TH FL
City	HOUSTON
State	TX
ZIP	77002
Phone (###-###-####)	7137675522
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	
E-mail	glenn.wright@shell.com

Duly Authorized Representative Contact

Person TCEQ should contact for questions about this application

Select existing DAR contact or enter a new contact.

Organization Name	DANA HERRERA(SHELL RENEWABLE...)
Prefix	SHELL RENEWABLE ASSET MANAGEMENT INTERNATIONAL
First	MS
Middle	DANA
Last	HERRERA
Suffix	
Credentials	
Title	GM ASSET MANAGEMENT
Enter new address or copy one from list	
Mailing Address	
Address Type	Domestic

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

150 N DAIRY ASHFORD RD

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

City

HOUSTON

State

TX

Zip

77079

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

8323370017

Extension

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

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

E-mail

Dana.Lipinsky@shell.com

Technical Contact

Person TCEQ should contact for questions about this application:

Select existing TC contact or enter a new contact.

New Contact

Organization Name

NAES

Prefix

MR

First

John

Middle

Last

Pandolph

Suffix

Credentials

Title

Senior Environmental Specialist

Enter new address or copy one from list:

Mailing Address

Address Type

Domestic

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

202 PECAN DR

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

City

LEAGUE CITY

State

TX

ZIP

77573

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

2815461630

Extension

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

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

E-mail

john.pandolph@naes.com

Title V General Information - Existing

1) Permit Type:

SOP

2) Permit Latitude Coordinate:

29 Deg 38 Min 47 Sec

3) Permit Longitude Coordinate:

95 Deg 27 Min 7 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

No

through permit conversion?

4.1.2. Are there any permits that should be voided upon issuance of this permit application through permit consolidation?

No

5) Who will electronically sign this Title V application?

Duly Authorized Representative

6) 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 Completed.pdf

Hash

D34AFA6768E5AB86EE7E9F821AF6E791615C39E5CB7AEA9670D89757B1A082B4

MIME-Type

application/pdf

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

Attach OP-REQ2 (Negative Applicable Requirement Determinations)

[File Properties]

File Name

OP-REQ2 Completed.pdf

Hash

AFC59DE0D18897D11CF4C1618198036E8F5860011E5141949969ED19F718A594

MIME-Type

application/pdf

Attach OP-REQ3 (Applicable Requirements Summary)

[File Properties]

File Name

OP-REQ3 Completed.pdf

Hash

9817E4254B7C96699C87931B05440D65C2EF1F34ECDC8864C62A2E8F4BCAF303

MIME-Type

application/pdf

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

[File Properties]

File Name

OP-UA1.pdf

Hash

E06DF972E96F9E2212881C02B3C86686796B7B4B2FD998A9DC3F113121025336

MIME-Type

application/pdf

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	FINAL Tejas Title V Minor Revision 3.2025.pdf
Hash	6765CA8D43F24B25E8FA986C7092476E4BD76D27DBF9EE0751D688DAEB592F6B
MIME-Type	application/pdf

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

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 Duly Authorized Representative 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 Dana Herrera, the owner of the STEERS account ER085155.
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 3999.
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: Dana Herrera OWNER OPERATOR

Account Number:	ER085155
Signature IP Address:	170.85.99.77
Signature Date:	2025-04-03
Signature Hash:	9CAA43D8D4E9F20EE249E81641686CC0449FFC4FE3DA3495106FE584690CC9BB
Form Hash Code at time of Signature:	9A8C965676FCB635205CA9685FA379AC992530A247F6787F6032D894DACFDEF0

Submission

Reference Number:	The application reference number is 774758
Submitted by:	The application was submitted by ER085155/Dana Herrera

Submitted Timestamp:

The application was submitted on 2025-04-03 at 13:56:39 CDT

Submitted From:

The application was submitted from IP address 170.85.99.77

Confirmation Number:

The confirmation number is 644031

Steers Version:

The STEERS version is 6.89

Permit Number:

The permit number is 3999

Additional Information

Application Creator: This account was created by Clarissa H Benitez



Tejas Power Generation, LLC

March 31, 2025

Air Permits Initial Review Team (APIRT), MC 161
P.O. Box 13087
Austin, Texas 78711-3087
Submitted Via STEERS

Subject: Title V Federal Operating Permit Minor Revision
Tejas Power Generation, LLC; Tejas Power Generation Unit 1
12100 Hiram Clarke Road, Houston
Houston, Harris County, Texas 77045
RN106425242
CN605784297
ORIS ID: 60468

Dear Sir or Madam:

On behalf of Tejas Power Generation, LLC, Tejas Power Generation Unit 1 is submitting the enclosed Title V Permit Minor Revision to incorporate newly promulgated regulations concerning 40 Code of Federal Regulation (CFR) 60 Subpart TTTTa, Standards of Performance for Greenhouse Gas Emissions for Modified Coal-Fired Steam Electric Generating Units and New Construction and Reconstruction Stationary Combustion Turbine Electric Generating Units. A copy of this application will be emailed to EPA, Region 6.

Please contact me at Leah.Fairhead@shell.com or 832-337-9276 or Mr. John Pandolph at John.Pandolph@naes.com or 281-546-1630 if you have any questions or require additional information.

Sincerely,

A handwritten signature in blue ink that reads "Leah Gully".

Leah Gully
Electrical Engineer
Shell Renewable Asset Management International
Tejas Power Generation, LLC
Enclosures

Cc:

EPA Region 6
Submitted Via Email: R6AirPermitsTX@epa.gov

Mr. Izzat Figueroa, Plant Manager, NAES Corporation
Submitted Via Email: Izzat.Figueroa@naes.com

12100 Hiram Clarke Road, Building D Houston, Texas 77045

**Federal Operating Permit Minor Revision
For
Tejas Power Generation Unit 1**

**CN605784297
RN106425242**

Submitted to
Texas Commission on Environmental Quality (TCEQ)

Submitted by
Tejas Power Generation, LLC

Prepared by



**1180 NW Maple Street, Suite 200
Issaquah, Washington 98027**

March 2025

Tejas Power Generation Unit 1

Title V Federal Operating Permit Minor Revision

Table of Contents

Section 1	Introduction	2
Section 2	Technical Information	3
Section 3	List of Forms in Order of Attachment.....	4

Section 1

Introduction

Tejas Power Generation, LLC (Tejas) is authorized to operate Tejas Power Generation Unit 1 by Electric Generation Unit (EGU) Standard Permit (SP) Number 103230 and EGU SP Number 170722. The EGUSP 103230 authorizes one natural gas-fired simple cycle Siemens 501D combustion turbine and related equipment. The EGUSP 170722 authorizes three (3) natural gas-fired simple cycle General Electric (GE) LM6000 combustion turbines and related equipment. All equipment is authorized under the Federal Operating Permit (FOP) number O-3999, which was recently issued by the Texas Commission On Environmental Quality (TCEQ) on February 23, 2024.

On May 9, 2024 the Environmental Protection Agency (EPA) finalized the Standards of Performance for Greenhouse Gas Emissions for Modified Coal-Fired Steam Electric Generating Units and New Construction and Reconstruction Stationary Combustion Turbine Electric Generating Units, 40 Code of Federal Regulations (CFR) 60, Subpart TTTTa. This regulation applies to any stationary combustion turbine that commences construction or reconstruction after May 23, 2023, that has a base load rating greater than 260 gigajoules per hour (GJ/h) (250 million British thermal units per hour (MMBtu/h)) of fossil fuel and serves a generator or generators capable of selling greater than 25 megawatts (MW) of electricity to a utility power distribution system. The three new LM6000 turbines that are currently under construction at the Tejas Power Generation Unit 1 site meet the applicability to this subpart; therefore, a minor permit revision is being submitted.

Section 2

Technical Information

The following equipment is currently authorized for construction at the Tejas facility under Standard Permit 30 TAC §116.610 and §116.615:

- One simple-cycle Siemens 501D gas combustion turbine
 - Three (3) GE LM 6000 simple-cycle natural gas combustion turbines
 - Selective catalytic reduction (SCR) ammonia injection systems for the control of nitrogen oxide emissions
 - Turbine lube oil recirculation systems
 - Cooling Tower
 - Diesel fired fire water pump
-

Section 3

List of Forms in Order of Attachment

OP-2

OP-REQ2

OP-REQ3

OP-UA1

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

Date: 03/31/2025
Permit No.: O-3999
Regulated Entity No.: RN106425242
Company Name: Tejas Power Generation, L.L.C.
For Submissions to EPA
Has an electronic copy of this application been submitted (or is being submitted) to EPA? ☒ YES ☐ NO
I. Application Type
Indicate the type of application:
☐ Renewal
☒ Streamlined Revision (Must include provisional terms and conditions as explained in the instructions.)
☐ Significant Revision
☐ Revision Requesting Prior Approval
☐ Administrative Revision
☐ Response to Reopening
II. Qualification Statement
For SOP Revisions Only ☒ YES ☐ NO
For GOP Revisions Only ☐ YES ☐ 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 ☐ SO ₂ ☐ PM ₁₀ ☐ 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: 03/31/2025
Permit No.: O-3999
Regulated Entity No.: RN106425242
Company Name: Tejas Power Generation, L.L.C

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.			
1	MS-A	No	GT-2	OP-UA11	170722	Incorporation of a newly promulgated regulation
2	MS-A	No	GT-3	OP-UA11	170722	Incorporation of a newly promulgated regulation
3	MS-A	No	GT-4	OP-UA11	170722	Incorporation of a newly promulgated regulation
4	MS-A	No	GT-2	OP-UA11	170722	Remove regulation that is no longer applicable
5	MS-A	No	GT-3	OP-UA11	170722	Remove regulation that is no longer applicable
6	MS-A	No	GT-4	OP-UA11	170722	Remove regulation that is no longer applicable

Form OP-REQ2
Negative Applicable/Superseded Requirement Determinations
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
03/31/2025	O-3999	RN106425242

Unit AI	Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	Potentially Applicable Regulatory Name	Negative Applicability/Superseded Requirement Citation	Negative Applicability/Superseded Requirement Reason
A	1	GT-2	OP-REQ2	40 CFR 60TTTTa	60.5509a	Effective 05/09/2024, this regulation (40 CFR 60 TTTTa) supersedes 40 CFR 60TTTT
A	2	GT-3	OP-REQ2	40 CFR 60TTTTa	60.5509a	Effective 05/09/2024, this regulation (40 CFR 60 TTTTa) supersedes 40 CFR 60TTTT
A	3	GT-4	OP-REQ2	40 CFR 60TTTTa	60.5509a	Effective 05/09/2024, this regulation (40 CFR 60 TTTTa) supersedes 40 CFR 60TTTT
D	4	GT-2	OP-REQ2	40 CFR 60TTTT	60.5509	40 CFR 60TTTT is no longer applicable to this unit and should be removed from permit.
D	5	GT-3	OP-REQ2	40 CFR 60TTTT	60.5509	40 CFR 60TTTT is no longer applicable to this unit and should be removed from permit.
D	6	GT-4	OP-REQ2	40 CFR 60TTTT	60.5509	40 CFR 60TTTT is no longer applicable to this unit and should be removed from permit.

**Applicable Requirements Summary
Form OP-REQ3 (Page 1)
Federal Operating Permit Program**

Table 1a: Additions

Date: 03/31/2025	Regulated Entity No.: RN106425242	Permit No.: O-3999
Company Name: Tejas Power Generation, L.L.C.	Area Name: Tejas Power Generation Unit 1	

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
1	GT-2	OP-UA11	60TTTTa	CO ₂	40 CFR 60, Subpart TTTTa	§60.5520a(a)-Table 1, §60.5520a(a), §60.5520a(b), §60.5525a, §60.5525a(a), §60.5525a(b), §60.5525a(c), §60.5525a(c)(1), §60.5525a(c)(1)(i), §60.5540a(a), §60.5540a(a)(1), §60.5540a(a)(2), §60.5540a(a)(3)
2	GT-3	OP-UA11	60TTTTa	CO ₂	40 CFR 60, Subpart TTTTa	§60.5520a(a)-Table 1, §60.5520a(a), §60.5520a(b), §60.5525a, §60.5525a(a), §60.5525a(b), §60.5525a(c), §60.5525a(c)(1), §60.5525a(c)(1)(i), §60.5540a(a), §60.5540a(a)(1), §60.5540a(a)(2), §60.5540a(a)(3)

3	GT-4	OP-UA11	60TTTTa	CO ₂	40 CFR 60, Subpart TTTTa	§60.5520a(a)-Table 1, §60.5520a(a), §60.5520a(b), §60.5525a, §60.5525a(a), §60.5525a(b), §60.5525a(c), §60.5525a(c)(1), §60.5525a(c)(1)(i), §60.5540a(a), §60.5540a(a)(1), §60.5540a(a)(2), §60.5540a(a)(3)

**Applicable Requirements Summary
Form OP-REQ3 (Page 2)
Federal Operating Permit Program**

Table 1b: Additions

Date: 03/31/2025	Regulated Entity No.: RN106425242	Permit No.: O-3999
Company Name: Tejas Power Generation, L.L.C	Area Name: Tejas Power Generation Unit 1	

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
1	GT-2	60 TTTTa	CO ₂	§60.5525a(a)(1), §60.5535a(a), §60.5535a(c), §60.5535a(c)(2), §60.5535a(c)(3), §60.5535a(c)(4), §60.5535a(d), §60.5535a(d)(1), §60.5540a(a), §60.5540a(a)(4), §60.5540a(a)(5), §60.5540a(a)(5)(i), §60.5540a(a)(5)(ii), §60.5540a(a)(6), §60.5540a(a)(6)(i), §60.5540a(a)(7), §60.5540a(b)	§60.5535a(c)(4), §60.5535a(d)(1), §60.5560a(a), §60.5560a(b)(1), §60.5560a(c), §60.5560a(d), §60.5560a(e), §60.5560a(f), §60.5560a(g), §60.5565a(a), §60.5565a(b), §60.5565a(c)	§60.5535a(c)(4), §60.5550a(a), §60.5550a(b), §60.5555a(a), §60.5555a(a)(1), §60.5555a(a)(2), §60.5555a(a)(3), §60.5555a(b), §60.5555a(c)(1), §60.5555a(c)(3)(i), §60.5555a(c)(3)(i)(A), §60.5555a(c)(3)(i)(B), §60.5555a(c)(4), §60.5555a(d)

2	GT-3	60 TTTTa	CO ₂	§60.5525a(a)(1), §60.5535a(a), §60.5535a(c), §60.5535a(c)(2), §60.5535a(c)(3), §60.5535a(c)(4), §60.5535a(d), §60.5535a(d)(1), §60.5540a(a), §60.5540a(a)(4), §60.5540a(a)(5), §60.5540a(a)(5)(i), §60.5540a(a)(5)(ii), §60.5540a(a)(6), §60.5540a(a)(6)(i), §60.5540a(a)(7), §60.5540a(b)	§60.5535a(c)(4), §60.5535a(d)(1), §60.5560a(a), §60.5560a(b)(1), §60.5560a(c), §60.5560a(d), §60.5560a(e), §60.5560a(f), §60.5560a(g), §60.5565a(a), §60.5565a(b), §60.5565a(c)	§60.5535a(c)(4), §60.5550a(a), §60.5550a(b), §60.5555a(a), §60.5555a(a)(1), §60.5555a(a)(2), §60.5555a(a)(3), §60.5555a(b), §60.5555a(c)(1), §60.5555a(c)(3)(i), §60.5555a(c)(3)(i)(A), §60.5555a(c)(3)(i)(B), §60.5555a(c)(4), §60.5555a(d)
3	GT-4	60 TTTTa	CO ₂	§60.5525a(a)(1), §60.5535a(a), §60.5535a(c), §60.5535a(c)(2), §60.5535a(c)(3), §60.5535a(c)(4), §60.5535a(d), §60.5535a(d)(1), §60.5540a(a), §60.5540a(a)(4), §60.5540a(a)(5), §60.5540a(a)(5)(i), §60.5540a(a)(5)(ii), §60.5540a(a)(6), §60.5540a(a)(6)(i), §60.5540a(a)(7), §60.5540a(b)	§60.5535a(c)(4), §60.5535a(d)(1), §60.5560a(a), §60.5560a(b)(1), §60.5560a(c), §60.5560a(d), §60.5560a(e), §60.5560a(f), §60.5560a(g), §60.5565a(a), §60.5565a(b), §60.5565a(c)	§60.5535a(c)(4), §60.5550a(a), §60.5550a(b), §60.5555a(a), §60.5555a(a)(1), §60.5555a(a)(2), §60.5555a(a)(3), §60.5555a(b), §60.5555a(c)(1), §60.5555a(c)(3)(i), §60.5555a(c)(3)(i)(A), §60.5555a(c)(3)(i)(B), §60.5555a(c)(4), §60.5555a(d)

**Applicable Requirements Summary
Form OP-REQ3 (Page 3)
Federal Operating Permit Program**

Table 2a: Deletions

Date: 03/31/2025	Regulated Entity No.: RN106425242	Permit No.: O-3999
Company Name: Tejas Power Generation, L.L.C	Area Name: Tejas Power Generation Unit 1	

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No.	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
4	GT-2	OP-UA11	60TTTT	CO ₂	40 CFR 60, Subpart TTTT	§60.5520(a)-Table 2, §60.5520(a), §60.5520(b), §60.5525, §60.5525(a), §60.5525(b), §60.5525(c), §60.5525(c)(1), §60.5525(c)(1)(i), §60.5540(a), §60.5540(a)(1), §60.5540(a)(2), §60.5540(a)(3)
5	GT-3	OP-UA11	60TTTT	CO ₂	40 CFR 60, Subpart TTTT	§60.5520(a)-Table 2, §60.5520(a), §60.5520(b), §60.5525, §60.5525(a), §60.5525(b), §60.5525(c), §60.5525(c)(1), §60.5525(c)(1)(i), §60.5540(a), §60.5540(a)(1), §60.5540(a)(2), §60.5540(a)(3)

6	GT-4	OP-UA11	60TTTT	CO ₂	40 CFR 60, Subpart TTTT	§60.5520(a)-Table 2, §60.5520(a), §60.5520(b), §60.5525, §60.5525(a), §60.5525(b), §60.5525(c), §60.5525(c)(1), §60.5525(c)(1)(i), §60.5540(a), §60.5540(a)(1), §60.5540(a)(2), §60.5540(a)(3)

**Applicable Requirements Summary
Form OP-REQ3 (Page 4)
Federal Operating Permit Program**

Table 2b: Deletions

Date: 03/31/2025	Regulated Entity No.: RN106425242	Permit No.: O-3999
Company Name: Tejas Power Generation, L.L.C	Area Name: Tejas Power Generation Unit 1	

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
4	GT-2	OP-UA11	60TTTT	CO ₂	§60.5525(a)(1), §60.5535(a), §60.5535(c), §60.5535(c)(2), §60.5535(c)(3), §60.5535(c)(4), §60.5535(d), §60.5535(d)(1), §60.5540(a), §60.5540(a)(4), §60.5540(a)(5), §60.5540(a)(5)(i), §60.5540(a)(5)(ii), §60.5540(a)(6), §60.5540(a)(6)(i), §60.5540(a)(7), §60.5540(b)	§60.5535(c)(4), §60.5535(d)(1), §60.5560(a), §60.5560(b)(1), §60.5560(c), §60.5560(d), §60.5560(e), §60.5560(f), §60.5560(g), §60.5565(a), §60.5565(b), §60.5565(c)	§60.5535(c)(4), §60.5550(a), §60.5550(b), §60.5555(a), §60.5555(a)(1), §60.5555(a)(2), §60.5555(a)(3), §60.5555(b), §60.5555(c)(1), §60.5555(c)(3)(i), §60.5555(c)(3)(i)(A), §60.5555(c)(3)(i)(B), §60.5555(c)(4), §60.5555(d)
5	GT-3	OP-UA11	60TTTT	CO ₂	§60.5525(a)(1), §60.5535(a), §60.5535(c), §60.5535(c)(2), §60.5535(c)(3), §60.5535(c)(4),	§60.5535(c)(4), §60.5535(d)(1), §60.5560(a), §60.5560(b)(1), §60.5560(c), §60.5560(d),	§60.5535(c)(4), §60.5550(a), §60.5550(b), §60.5555(a), §60.5555(a)(1), §60.5555(a)(2),

					§60.5535(d), §60.5535(d)(1), §60.5540(a), §60.5540(a)(4), §60.5540(a)(5), §60.5540(a)(5)(i), §60.5540(a)(5)(ii), §60.5540(a)(6), §60.5540(a)(6)(i), §60.5540(a)(7), §60.5540(b)	§60.5560(e), §60.5560(f), §60.5560(g), §60.5565(a), §60.5565(b), §60.5565(c)	§60.5555(a)(3), §60.5555(b), §60.5555(c)(1), §60.5555(c)(3)(i), §60.5555(c)(3)(i)(A), §60.5555(c)(3)(i)(B), §60.5555(c)(4), §60.5555(d)
6	GT-4	OP-UA11	60TTTT	CO ₂	§60.5525(a)(1), §60.5535(a), §60.5535(c), §60.5535(c)(2), §60.5535(c)(3), §60.5535(c)(4), §60.5535(d), §60.5535(d)(1), §60.5540(a), §60.5540(a)(4), §60.5540(a)(5), §60.5540(a)(5)(i), §60.5540(a)(5)(ii), §60.5540(a)(6), §60.5540(a)(6)(i), §60.5540(a)(7), §60.5540(b)	§60.5535(c)(4), §60.5535(d)(1), §60.5560(a), §60.5560(b)(1), §60.5560(c), §60.5560(d), §60.5560(e), §60.5560(f), §60.5560(g), §60.5565(a), §60.5565(b), §60.5565(c)	§60.5535(c)(4), §60.5550(a), §60.5550(b), §60.5555(a), §60.5555(a)(1), §60.5555(a)(2), §60.5555(a)(3), §60.5555(b), §60.5555(c)(1), §60.5555(c)(3)(i), §60.5555(c)(3)(i)(A), §60.5555(c)(3)(i)(B), §60.5555(c)(4), §60.5555(d)

**Texas Commission on Environmental Quality
Miscellaneous Unit Attributes
Form OP-UA1 (Page 1)
Federal Operating Permit Program**

Date:	03/31/2025
Permit No.:	O-3999
Regulated Entity No.:	RN106425242

Unit ID No.	SOP/GOP Index No.	Unit Type	Date Constructed/Placed in Service	Functionally Identical Replacement	Maximum Rated Capacity	Technical Information and Unit Description
GT-2	60TTTTa	EU	FCD+	No	5+	Simple cycle peaking turbine rated at 50 MW
GT-3	60TTTTa	EU	FCD+	No	5+	Simple cycle peaking turbine rated at 50 MW
GT-4	60TTTTa	EU	FCD+	No	5+	Simple cycle peaking turbine rated at 50 MW