# Texas Commission on Environmental Quality INTEROFFICE MEMORANDUM

**TO:** Office of Chief Clerk

Date: April 17, 2025

FROM: Amanda Kraynok Contessa Gay Staff Attorneys Environmental Law Division

**SUBJECT:** Transmittal of Documents for Administrative Record

Applicant: Proposed Permit Nos.:	Wolf Hollow II Power, LLC 175173, PSDTX1636
Program:	Air
Docket Nos.:	TCEQ Docket No. 2024-1918-AIR
	SOAH Docket No. 582-25-15485

In a contested case hearing, the administrative record includes copies of the public notices relating to the permit application, as well as affidavits of public notices that are filed by the Applicant directly with the Office of the Chief Clerk (OCC). In addition, the record includes the documents listed below that are provided to the OCC by the Executive Director's staff, as required by 30 Tex. Admin. Code § 80.118.

This transmittal serves to also request that the OCC transmit the attached items and the public notice documents, including the notice of hearing, to the State Office of Administrative Hearings.

Documents included with this transmittal are indicated below:

- The final draft permit, including any special conditions or provisions
- Maximum Allowable Emission Rate Table (MAERT)
- The summary of the technical review of the permit application
- The First Air Quality Analysis Audit memoranda
- The Second Air Quality Analysis Audit memoranda
- The compliance summary of the Applicant
- The Executive Director's Preliminary Decision and the Executive Director's Decision on the Permit Application, if applicable
- The Executive Director's Response to Public Comment on the Permit Application
- The List of Actions from the Commissioner's Integrated Database (CID).

State of Texas County of Travis

I hereby certify this is a true and correct copy of a Texas Commission on Environmental Quality (TCEQ) document, which is filed in the Records of the Commission, Given under my hand and the seal of office.

#### **Special Conditions**

Permit Numbers 1715173, PSDTX1636, and GHGPSDTX238 Alternative Custodian of Records

 This permit covers only those sources of emissions listed in the attached table entitled "Emission Sources – Maximum Allowable Emission Rates (MAERT)," including planned maintenance, startup, and shutdown (MSS) activities, and those sources are limited to the emission limits on that table and other conditions specified in this permit.

#### **Federal Applicability**

- 2. These facilities shall comply with applicable requirements of the EPA regulations on Standards of Performance for New Stationary Sources, Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60):
  - A. Subpart A: General Provisions.
  - B. Subpart GG: Standards of Performance for Stationary Combustion Turbines
- These facilities shall comply with applicable requirements of the EPA regulations on National Emission Standards for Hazardous Air Pollutants for Source Categories, Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63):
  - A. Subpart A: General Provisions.
  - B. Subpart ZZZZ: National Emission Standards for HAPs for Stationary Reciprocating Internal Combustion Engines (RICE)
- 4. This permit authorizes eight General Electric Model 6B (GE 6B) simple cycle combustion turbines (CTGs) rated at nominal capability of 352 megawatts (MW) combined.

#### **CTG Emission Rates/Operating Specifications**

5. Each CTG shall not exceed the following emission limits expressed in parts per million by volume dry (ppmvd) at 15% oxygen (O<sub>2</sub>) subject to the following specifications:

Pollutant	Concentration	Averaging time
NOx	9.0	3-hr average
CO	25.0	3-hr average

- A. Startup is defined as the period beginning when the gas turbine receives a "turbine start" signal and an initial flame detection signal is recorded in the plant's control system and ending when the combustion turbine output reaches minimum sustainable load, which is typically the point at which the unit reaches the lean pre-mix operating mode. A planned startup shall not exceed 60 minutes. Planned startups are excluded from the emission limits of this Special Condition.
- B. The shutdown period is defined as the period beginning when the gas turbine receives a "turbine stop" command and the generator output drops below the minimum stable load and ending when a flame detection signal is no longer recorded in the plant's control system. A planned shutdown shall not exceed 60 minutes. Planned shutdowns are excluded from the emission limits of this Special Condition.

- C. Reduced load operation is defined as operational loads below 50% of full load and the emission concentrations are excluded. The emission from reduced load operation shall not exceed the maximum hourly emission rates in the MAERT.
- D. In the event a CTG is instructed to return to normal operating load during a shutdown event, this will immediately end the shutdown event (i.e., an interrupted shutdown), and begin a start-up event and is excluded.
- 6. The CTGs combined shall not exceed 13,076,000 MMBtu/yr on a 12-month rolling average.

### CTG GHG Emission Rates/Operating Specifications

7. Each CTG during turbine load operations shall not exceed the following limits based on a 12-month rolling average.

Source	EPNs	Output Specific CO <sub>2</sub> Emission Rate (Ibs CO <sub>2</sub> e/MWh)
GE 6B Simple Cycle Turbine	E-SCT7	1,482
GE 6B Simple Cycle Turbine	ESCT8	1,482
GE 6B Simple Cycle Turbine	E-SCT9	1,482
GE 6B Simple Cycle Turbine	E-SCT10	1,482
GE 6B Simple Cycle Turbine	E-SCT11	1,482
GE 6B Simple Cycle Turbine	E-SCT12	1,482
GE 6B Simple Cycle Turbine	E-SCT13	1,482
GE 6B Simple Cycle Turbine	E-SCT14	1,482

A. Emissions associated with the activities listed in Special Condition No. 5 (A-D) shall not be included in determining compliance with the performance standards listed above and shall be minimized through the application of work practices. Emissions during all operating modes shall not exceed the carbon dioxide equivalent (CO<sub>2</sub>e) mass emission rates identified in the MAERT.

### **General Operating Specifications/Fuel Specifications**

- 8. During normal operations, opacity of emissions from all stacks authorized by this permit shall not exceed 5 percent averaged over a six-minute period. During periods of MSS operation of the turbines, the opacity shall not exceed 15 percent averaged over a six-minute period. The permit holder shall demonstrate compliance with this Special Condition in accordance with the following procedures:
  - A. Visible emission observations shall be conducted and recorded at least once during each calendar quarter while the facilities are in operation unless the emission unit is not operating for the entire calendar quarter.
  - B. This determination shall be made by first observing for visible emissions while each facility is in operation. Observations shall be made at least 15 feet and no more than 0.25 miles from

the emission point(s). Up to three emissions points may be read concurrently, provided that all three emissions points are within a 70-degree viewing sector or angle in front of the observer such that the proper sun position (at the observer's back) can be maintained for all three emission points. A certified opacity reader is not required for these visible emission observations.

- C. If visible emissions are observed from an emission point, then the opacity shall be determined and documented within 24 operating hours for that emission point using Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60), Appendix A, Reference Method 9.
- D. If the opacity limitations of this Special Condition are exceeded, corrective action to eliminate the source of visible emissions shall be taken promptly and documented within one operating week of the exceedance.
- E. Each emergency diesel generator shall each not exceed 100 hours of non-emergency operation per year each on a rolling 12-month average.

### **Fuel requirements**

- 9. Natural gas containing no more than 1.0 grains total sulfur per 100 dry standard cubic feet (gr/100 dscf) on an hourly/annual basis.
- 10. Diesel fuel containing no more than 15 ppm sulfur by weight.

### **Initial Determination of Compliance**

- 11. Sampling ports and platforms shall be incorporated into the design of all exhaust stacks according to the specifications set forth in the manual entitled "Chapter 2, Stack Sampling Facilities." Alternate sampling facility designs may be submitted for approval by the TCEQ Dallas/Fort Worth Regional Director.
- 12. The holder of this permit shall perform stack sampling and other testing as required to establish the actual quantities of air contaminants being emitted into the atmosphere from each CTG to determine initial compliance with all emission limits established in this permit.

Sampling shall be conducted in accordance with the appropriate procedures of the TCEQ Sampling Procedures Manual and in accordance with the appropriate EPA Reference Methods to be determined during the pretest meeting.

- A. Air contaminants and diluents to be sampled and analyzed on the gas turbines include (but are not limited to) NO<sub>x</sub>, O<sub>2</sub>, CO, volatile organic compounds, sulfur dioxide (SO<sub>2</sub>) unless deriving from the sulfur-in-fuel, particulate matter less than 10 microns in diameter, and formaldehyde.
- B. Each CTG shall be tested at  $\pm$  10% of peak load.
- C. Fuel sampling using the methods and procedures of 40 Code of Federal Regulations, Subpart GG. If fuel sampling is used, compliance with New Source Performance Standards (NSPS) Subpart GG, SO<sub>2</sub> limits shall be based on 100 percent conversion of the sulfur in the fuel to SO<sub>2</sub>. Any deviations from those procedures must be approved by the Executive Director of the TCEQ prior to sampling. The TCEQ Executive Director or his designated representative shall be afforded the opportunity to observe all such sampling.

- D. The holder of this permit is responsible for providing sampling and testing facilities and conducting the sampling and testing operations at his expense.
- E. The TCEQ Dallas/Fort Worth Regional Office shall be contacted as soon as testing is scheduled but not less than 45 days prior to sampling to schedule a pretest meeting. The notice shall include:
  - (1) Date for pretest meeting.
  - (2) Date sampling will occur.
  - (3) Name of firm conducting sampling.
  - (4) Type of sampling equipment to be used.
  - (5) Method or procedure to be used in sampling.
  - (6) Procedure used to determine turbine loads during and after the sampling period.

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

- F. Sampling as required by this condition shall occur within 60 days after achieving the maximum production rate at which each turbine will be operated, but no later than 180 days after initial start-up of each unit. Additional sampling may be required by TCEQ or EPA.
- G. Within 60 days after the completion of the testing and sampling required herein, two copies of the sampling reports shall be distributed as follows:
  - (1) One copy to the TCEQ Dallas/Fort Worth Regional Office.
  - (2) One copy to the EPA Region 6 Office, Dallas.

# GHG Initial Demonstration of Compliance (CTG)

13. After the first full calendar month of operation, the permit holder shall compare that month's gross heat rate and output specific CO<sub>2</sub> emission rate to the limits in this permit and the MAERT. Within 45 days after collecting the data, the permit holder shall submit a report to the region identifying whether the data causes any concerns regarding the permit holder's ability to comply with the applicable limitations.

#### Acid Rain Permit Cross-State Air Pollution Rule (CSAPR) Trading Program Requirements

14. For the eight CTGs, the designated representative and the owner or operator, as applicable, shall comply with applicable Acid Rain and CSAPR requirements.

15. The facility will, at least initially, utilize the provisions contained within 40 CFR 75.19 for low mass emission (LME) units to calculate NO<sub>x</sub>, SO<sub>2</sub>, and CO<sub>2</sub> emissions from the eight units. The facility has the option to follow 40 CFR 75 procedures to switch monitoring methods in the future.

#### **Continuous Determination of Compliance**

- 16. Exclusive of MSS hours, the holder of this permit shall demonstrate compliance with TCEQ NOx emission limits (ppm@15%O<sub>2</sub> and lb/hr) each operating hour by monitoring that the turbine is in the low-NOx or premixed combustion mode; therefore, maintaining proper operation of the dry low-NOx premix technology used to control NO<sub>x</sub> emissions.
- 17. In addition to the initial compliance stack testing, the facility may conduct the optional stack testing to obtain fuel-and-unit-specific NOx emission rates every five years (20 calendar quarters) or use the NOx emission rate from Table LM-2 in accordance with 40 CFR 75.19(c)(1)(iv).
- The TCEQ Dallas/Fort Worth Regional Office shall be notified at least 21 days prior to any optional testing conducted in accordance with 40 CFR 75.19(c)(1)(iv) to provide them the opportunity to observe testing.
- 19. The permit holder shall install, calibrate, maintain, and operate a continuous monitoring system to monitor and record the average hourly natural gas consumption of the CTGs using a fuel flow meter certified and maintained according to 40 CFR Part 75, Appendix D. The permit holder may use an alternate method as specified in 40 CFR Part 75.19(c)(3)(ii)(B).

### GHG Continuous Demonstration of Compliance (CTG)

20. Compliance with the GHG requirements of this permit shall be demonstrated by following the requirements of and using the applicable equations of 40 CFR, Part 98, Mandatory GHG Reporting. Global warming potentials are listed in footnote 3 of the MAERT.

### **Continuous Demonstration of Compliance (Natural Gas Fugitives)**

- 21. The permit holder shall minimize emissions from pressurized components and equipment containing GHG as follows:
  - A. Piping and valves in natural gas service within the operating area must be checked weekly for leaks using audio, visual, and olfactory (AVO) sensing for natural gas leaks. If the site is not manned for a given week, an AVO check shall be performed the next week plant personnel are on-site.
  - B. As soon as practicable following the detection of a leak, plant personnel shall take one or more of the following actions:
    - (1) Locate and isolate the leak, if necessary.
    - (2) Commence repair or replacement of the leaking component.
    - (3) Use a leak collection or containment system to control the leak until repair or replacement can be made if immediate repair is not possible.

#### **Continuous Demonstration of Compliance (Circuit Breakers)**

- 22. The sulfur hexafluoride (SF<sub>6</sub>)-enclosed circuit breakers shall be designed to meet the latest American National Standards Institute (ANSI) C37.013 standard for high voltage circuit breakers. The circuit breakers must be guaranteed to achieve a SF<sub>6</sub> leak rate of 0.5% by weight or less annually. The circuit breakers must be in a totally enclosed, pressurized compartment equipped with an alarm that signals the plant control room in the event that any circuit breaker loses pressure to the extent that 10% of the SF<sub>6</sub> has leaked.
- 23. The permit holder shall equip the circuit breakers with a low-pressure alarm and a low pressure lockout. As soon as practicable following the detection of a leak, plant personnel shall take one or more of the following actions:
  - A. Locate and isolate the leak using a sulfur hexafluoride (SF<sub>6</sub>) leak collections or containment system to control the leak until repair or replacement can be made if immediate repair is not possible.
  - B. Commence repair or replacement of the leaking component.

#### Maintenance

- 24. Compliance with the emissions limits for planned maintenance activities for each CTG and fugitives (E-TRBMSSP3) identified in Attachment A may be demonstrated as follows.
  - A. For each pollutant emitted during planned maintenance activities whose emissions occur through a stack the permit holder shall for each calendar month determine the total emissions of the pollutant.
  - B. Sum all emissions from planned maintenance activities on a 12-month rolling basis for each EPN to show compliance with the MAERT.
  - C. Emissions from CTG diagnostic load reduction activities identified in Attachment A shall be subject to the hourly MSS emission rates on the MAERT and shall not exceed 54 hours for all CTGs combined at the site.

# **Recordkeeping Requirements**

- 25. The following records shall be kept at the plant for the life of the permit. All records required in this permit shall be made available at the request of personnel from the TCEQ, EPA, or any air pollution control agency with jurisdiction:
  - A. A copy of this permit.
  - B. Permit application dated January 25, 2024 and subsequent representations submitted to the TCEQ.
  - C. A complete copy of the testing reports and records of the initial performance testing completed to demonstrate initial compliance.
  - D. Stack sampling results or other air emissions testing (other than CEMS data) that may be conducted on units authorized under this permit after the date of issuance of this permit.

- 26. The following information shall be maintained by the holder of this permit in a form suitable for inspection for a period of five years after collection and shall be made available upon request to representatives of the TCEQ, EPA, or any local air pollution control program having jurisdiction:
  - A. Records to demonstrate compliance NO<sub>x</sub> and CO, and O<sub>2</sub> emissions from each CTG to demonstrate compliance with the emission rates listed in this permit and attached MAERT.
  - B. Records of dates and times for startups and shutdowns of each CTG.
  - C. Records of the amount of natural gas fired on 12-month rolling average.
  - D. Records of visible emissions observations and opacity readings.
  - E. Records of hours of operation and sulfur content of diesel fuel fired in each emergency diesel generator.
  - F. Records of AVO checks, maintenance performed to any piping and valves in natural gas service.
  - G. Records of monitored or calculated maintenance emissions.
  - H. Records of all calculations to demonstrate compliance with 40 CFR Part 98.
  - I. Records of maintenance or leak repair performed on SF<sub>6</sub> containing circuit breakers.

Date: TBD

# Permit Numbers 175173, PSDTX1636, and GHGPSDTX238

#### Attachment A

Planned Maintenance Activities							
Activities EDN Emissions							
Activities	EPN	NOx	СО	VOC	РМ	SO <sub>2</sub>	
Combustion unit tuning <sup>1</sup>	E-SCT7, ESCT8 E-SCT9, E-SCT10 E-SCT11, E-SCT12 E-SCT13, E-SCT14	x	х	x	x	х	
On-line turbine washing <sup>2</sup>	E-SCT7, ESCT8 E-SCT9, E-SCT10 E-SCT11, E-SCT12 E-SCT13, E-SCT14	×	×	x	x	х	
Miscellaneous PM filter maintenance <sup>3</sup>	E-TRBMSSP3		2	7	Х		
Management of sludge from pits, ponds, sumps, and water conveyances <sup>4</sup>	E-TRBMSSP3			х			
Inspection, repair, replacement, adjusting, testing, and calibration of analytical equipment, process instruments including sight glasses, meters, gauges, CEMS, PEMS	E-TRBMSSP3		х	х	х	х	

Date: TBD

<sup>&</sup>lt;sup>1</sup> Includes, but is not limited to: leak operability checks (*e.g. turbine overspeed test, troubleshooting*), seasonal tuning, and balancing. <sup>2</sup> Involves use of water only.

<sup>&</sup>lt;sup>3</sup> Includes, but is not limited: process-related building filters, and combustion turbine air intake filters

<sup>&</sup>lt;sup>4</sup> Includes, but is not limited to: mgmt. by vacuum truck/dewatering of material in open pits/ponds/sumps/tanks and other closed or open vessels. Material managed include water and sludge materials containing miscellaneous VOCs such as diesel, lube oil, and other waste oils.

State of Texas County of Travis

APR 1 5 2025

I hereby certify this is a true and correct copy of a Texas Commission on Environmental Quality (TCEQ) Emission Sources — Maximum Allowable Emission Rates, which is filed in the Records of the Commission. Given under my hand and the seal of office.

Permit Numbers 175173 and PSDTX1636

MAD 2

This table lists the maximum allowable emission rates and all sources of air contaminants on the application property covered by this permit. The emission rates shown are those derived from information subfritted 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 Rates Emission Point No. Air Contaminant** Source Name (2) (1) Name (3) **TPY (4)** lbs/hour E-SCT7 CT7 (5) NOx 17.36 NOx (MSS) 33.00 CO 29.35 -CO (MSS) 42.0 -VOC 0.94 -PM 4.00 ..... PM10 4.00 -PM2.5 4.00 -SO<sub>2</sub> 1.48 -H<sub>2</sub>SO<sub>4</sub> 0.18 -H<sub>2</sub>CO (7) 0.37 -CT8 (5) E-SCT8 NO<sub>x</sub> 17.36 \_ NOx (MSS) 33.00 -CO 29.35 -CO (MSS) 42.0 -VOC 0.94 -PM 4.00 -PM10 4.00 -PM<sub>2.5</sub> 4.00 -SO<sub>2</sub> 1.48 -H<sub>2</sub>SO<sub>4</sub> 0.18 -H<sub>2</sub>CO (7) 0.37 -E-SCT9 CT9 (5) NOx 17.36 -NOx (MSS) 33.00 \_

Project Number: 369521

Emission Point No.	Emission Point No. Source Name (2)	Air Contaminant	Emission Rates		
(1)	Source Name (2)	Name (3)	lbs/hour	TPY (4)	
		СО	29.35	-	
		CO (MSS)	42.0	-	
		VOC	0.94	-	
		РМ	4.00	-	
		PM <sub>10</sub>	4.00	-	
		PM <sub>2.5</sub>	4.00	-	
		SO <sub>2</sub>	1.48	-	
		H <sub>2</sub> SO <sub>4</sub>	0.18	-	
		H <sub>2</sub> CO (7)	0.37	-	
E-SCT10	CT10 (5)	NOx	17.36	-	
		NOx (MSS)	33.00	-	
		со	29.35	-	
		CO (MSS)	42.0	-	
		VOC	0.94	-	
		PM	4.00	-	
		PM10	4.00	-	
		PM <sub>2.5</sub>	4.00	-	
		SO <sub>2</sub>	1.48	-	
		H <sub>2</sub> SO <sub>4</sub>	0.18	-	
		H <sub>2</sub> CO (7)	0.37	-	
E-SCT11	CT11 (5)	NOx	17.36	-	
		NOx (MSS)	33.00	-	
		со	29.35	-	
		CO (MSS)	42.0	-	
		VOC	0.94	-	
		РМ	4.00	-	
		PM <sub>10</sub>	4.00	-	

# Emission Sources - Maximum Allowable Emission Rates

Emission Point No.	Source Name (2)	Air Contaminant Name (3)	Emission Rates		
(1)	Source Name (2)		lbs/hour	TPY (4)	
		PM <sub>2.5</sub>	4.00	-	
		SO <sub>2</sub>	1.48	-	
		H <sub>2</sub> SO <sub>4</sub>	0.18	-	
		H <sub>2</sub> CO (7)	0.37	-	
E-SCT12	CT12 (5)	NOx	17.36	-	
		NOx (MSS)	33.00	-	
		со	29.35	-	
		CO (MSS)	42.0	-	
		voc	0.94	-	
		РМ	4.00	-	
		PM <sub>10</sub>	4.00	-	
		PM <sub>2.5</sub>	4.00	-	
		SO <sub>2</sub>	1.48	-	
		H <sub>2</sub> SO <sub>4</sub>	0.18	-	
		H₂CO (7)	0.37	-	
E-SCT13	CT13 (5)	NOx	17.36	-	
		NOx (MSS)	33.00	-	
		со	29.35	-	
		CO (MSS)	42.0	-	
		VOC	0.94	-	
		РМ	4.00	-	
		PM10	4.00	-	
		PM <sub>2.5</sub>	4.00	-	
		SO <sub>2</sub>	1.48	-	
		H <sub>2</sub> SO <sub>4</sub>	0.18	-	
		H <sub>2</sub> CO (7)	0.37	-	
E-SCT14	CT14 (5)	NOx	17.36	-	

Emission Sources - Maximum Anowable Emission Rates	Emission	Sources	- Maximum	Allowable	Emission	Rates
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Emission Point No.	Source Name (2)	Air Contaminant	Emission Rates		
(1)	Source Name (2)	Name (3)	lbs/hour	TPY (4)	
		NOx (MSS)	33.00	-	
		со	29.35	-	
		CO (MSS)	42.0	-	
		VOC	0.94	-	
		PM	4.00	-	
		PM <sub>10</sub>	4.00	-	
		PM <sub>2.5</sub>	4.00	-	
		SO <sub>2</sub>	1.48	_	
		H <sub>2</sub> SO <sub>4</sub>	0.18	-	
	41	H <sub>2</sub> CO (7)	0.37	-	
8 SCTs	Simple Cycle CTGs	NOx	-	244.61	
		со	_	394.36	
		VOC	-	11.96	
		PM	-	56.00	
		PM10	-	56.00	
		PM2.5	-	56.00	
		SO <sub>2</sub>	-	4.01	
		H <sub>2</sub> SO <sub>4</sub>	-	0.49	
		H <sub>2</sub> CO (7)	-	4.75	
ST-SCT7LOV	Turbine 7 Lube Oil Vent	VOC	<0.01	0.01	
		РМ	<0.01	0.01	
		PM <sub>10</sub>	<0.01	0.01	
		PM <sub>2.5</sub>	<0.01	0.01	
ST-SCT8LOV	Turbine 8 Lube Oil Vent	VOC	<0.01	0.01	
		РМ	<0.01	0.01	
		PM <sub>10</sub>	<0.01	0.01	
		PM <sub>2.5</sub>	<0.01	0.01	

Emission	Sources -	Maximum	Allowable	Emission	Rates
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Emission Point No.	Source Name (2)	Air Contaminant	Emission Rates		
(1)	Source Name (2)	Name (3)	lbs/hour	TPY (4)	
ST-SCT9LOV	Turbine 9 Lube Oil Vent	VOC	<0.01	0.01	
		PM	<0.01	0.01	
		PM <sub>10</sub>	<0.01	0.01	
		PM <sub>2.5</sub>	<0.01	0.01	
ST-SCT10LOV	Turbine 10 Lube Oil Vent	voc	<0.01	0.01	
		PM	<0.01	0.01	
		PM10	<0.01	0.01	
		PM <sub>2.5</sub>	<0.01	0.01	
ST-SCT11LOV	Turbine 11 Lube Oil Vent	voc	<0.01	0.01	
		РМ	<0.01	0.01	
		PM <sub>10</sub>	<0.01	0.01	
		PM <sub>2.5</sub>	<0.01	0.01	
ST-SCT12LOV	Turbine 12 Lube Oil Vent	voc	<0.01	0.01	
		PM	<0.01	0.01	
		PM10	<0.01	0.01	
		PM2.5	<0.01	0.01	
ST-SCT13LOV	Turbine 13 Lube Oil Vent	voc	<0.01	0.01	
		РМ	<0.01	0.01	
		PM <sub>10</sub>	<0.01	0.01	
		PM <sub>2.5</sub>	<0.01	0.01	
ST-SCT14LOV	Turbine 14 Lube Oil Vent	VOC	<0.01	0.01	
		РМ	<0.01	0.01	
		PM <sub>10</sub>	<0.01	0.01	
		PM <sub>2.5</sub>	<0.01	0.01	
E-GEN3	Emergency Generator 3	NOx	45.74	2.29	
		со	6.44	0.32	
		voc	1.29	0.06	

## Emission Sources - Maximum Allowable Emission Rates

Emission Point No.	Source Name (2)	Air Contaminant	Emission Rates		
(1)		Name (3)	lbs/hour	TPY (4)	
		РМ	0.26	0.01	
		PM <sub>10</sub>	0.26	0.01	
		PM <sub>2.5</sub>	0.26	0.01	
		SO <sub>2</sub>	0.03	<0.01	
		H <sub>2</sub> CO (7)	<0.01	<0.01	
E-GEN4	Emergency Generator 4	NOx	45.74	2.29	
		со	6.44	0.32	
		voc	1.29	0.06	
		РМ	0.26	0.01	
		PM <sub>10</sub>	0.26	0.01	
		PM <sub>2.5</sub>	0.26	0.01	
		SO <sub>2</sub>	0.03	<0.01	
		H <sub>2</sub> CO (7)	<0.01	<0.01	
E-GEN5	Emergency Generator 5	NOx	45.74	2.29	
		co	6.44	0.32	
		voc	1.29	0.06	
		РМ	0.26	0.01	
		PM <sub>10</sub>	0.26	0.01	
		PM <sub>2.5</sub>	0.26	0.01	
		SO <sub>2</sub>	0.03	<0.01	
		H <sub>2</sub> CO (7)	<0.01	<0.01	
E-NGFUG-P3	Natural Gas Fugitives Plant 3	VOC	0.02	0.07	
E-TRBMSSP3	Turbine Maintenance Fugitives	NO <sub>x</sub>	0.01	0.01	
		СО	0.01	0.01	
		VOC	0.85	0.01	
		PM	0.37	0.07	

Emission Sources - Maximum Anowable Emission Rales	Emission	Sources -	- Maximum	Allowable	Emission	Rates
----------------------------------------------------	----------	-----------	-----------	-----------	----------	-------

Emission Point No. (1)	Source Name (2)	Air Contaminant	Emission Rates		
		Name (3)	lbs/hour	TPY (4)	
		PM <sub>10</sub>	0.37	0.07	
		PM <sub>2.5</sub>	0.37	0.07	
E-DSLTK3	Storage Tank – No. 2 Fuel Oil	VOC	0.11	<0.01	
E-DSLTK4	Storage Tank – No. 2 Fuel Oil	VOC	0.11	<0.01	
E-DSLTK5	Storage Tank – No. 2 Fuel Oil	VOC	0.11	<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<sub>x</sub>

ΡM

**PM**<sub>10</sub>

PM<sub>2.5</sub>

- total oxides of nitrogen - volatile organic compounds as defined in Title 30 Texas Administrative Code § 101.1

VOC	- volatile organic c
CO	- carbon monoxide

- H<sub>2</sub>CO - formaldehyde
  - total particulate matter, suspended in the atmosphere, including PM<sub>10</sub> and PM<sub>2.5</sub>

- total particulate matter equal to or less than 10 microns in diameter, including PM2.5

- particulate matter equal to or less than 2.5 microns in diameter
- sulfur dioxide SO<sub>2</sub>
- sulfuric acid  $H_2SO_4$
- H<sub>2</sub>CO - formaldehyde MSS
  - maintenance, startup, and shutdown
- NH<sub>3</sub> - ammonia
- (4) Compliance with annual emission limits (tons per year) is based on a 12-month rolling period.
- (5) Planned maintenance, startup, and shutdown emissions for all pollutants are authorized even if not specifically identified as MSS. During any clock hour that includes one or more minutes of planned MSS that pollutant's maximum hourly emission rated shall apply during that clock hour.
- (6) Emission rate is an estimate and is enforceable through compliance with the applicable special condition(s) and permit application representations.
- (7) The speciated emission rate is included in the VOC emission rate.

TBD Date:

Project Number: 369521

#### Emission Sources — Maximum Allowable Emission Rates

#### Permit Number GHGPSDTX238

This table lists the maximum allowable emission rates of greenhouse gas (GHG) emissions, as defined in Title 30 Texas Administrative Code § 101.1, for all sources of GHG air contaminants on the applicant's property that are authorized 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 authorized by this permit.

Emission Point No.	Source Name (2)	Air Contaminant	Emission Rates	
(1)		Name (3)	TPY (4,5)	
8 SCTs	Simple Cycle CTGs	N <sub>2</sub> O (5)	1.47	
		CH4 (5)	14.72	
		CO <sub>2</sub> (5)	795,115.89	
		CO <sub>2</sub> e (a)	795,922.40	
		CO <sub>2</sub> e (b)	795,917.99	
E-GEN3	Emergency Generator 3	N <sub>2</sub> O (5)	<0.01	
		CH4 (5)	0.01	
		CO <sub>2</sub> (5)	154.47	
		CO <sub>2</sub> e (a)	155.00	
		CO <sub>2</sub> e (b)	154.98	
E-GEN4	Emergency Generator 4	N <sub>2</sub> O (5)	<0.01	
		CH4 (5)	0.01	
		CO <sub>2</sub> (5)	154.47	
		CO <sub>2</sub> e (a)	155.00	
		CO <sub>2</sub> e (b)	154.98	
E-GEN5	Emergency Generator 5	N <sub>2</sub> O (5)	<0.01	
		CH4 (5)	0.01	
		CO <sub>2</sub> (5)	154.47	
		CO <sub>2</sub> e (a)	155.00	
		CO <sub>2</sub> e (b)	154.98	
E-TRBMSSP3	Turbine Maintenance Fugitives	CH4 (5)	0.10	
ļ	Plant 3	CO <sub>2</sub> (5)	<0.01	
		CO <sub>2</sub> e (a)	2.56	
		CO <sub>2</sub> e (b)	2.87	
E-NGFUG-P3	Natural Gas Fugitives – Plant 3	CH <sub>4</sub> (5)	8.43	
		CO <sub>2</sub> (5)	0.08	

Emission Point No.	Source Name (2)	Air Contaminant	Emission Rates	
(1)		Name (3)	TPY (4,5)	
		CO <sub>2</sub> e (a)	210.94	
		CO <sub>2</sub> e (b)	236.24	
E-SF6FUG	SF6 Fugitives	SF <sub>6</sub> (5)	<0.01	
		CO <sub>2</sub> e (a)	22.80	
		CO <sub>2</sub> e (b)	23.50	

- (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) N<sub>2</sub>O nitrous oxide
  - CH<sub>4</sub> methane
  - CO<sub>2</sub> carbon dioxide
  - SF<sub>6</sub> sulfur hexafluoride
  - CO<sub>2</sub>e carbon dioxide equivalents based on the following Global Warming Potentials (GWP): a) found in Table A-1 of Subpart A 40 CFR Part 98 (78 FR 71904) for each pollutant: CO<sub>2</sub> (1), N<sub>2</sub>O (298), CH<sub>4</sub> (25), SF<sub>6</sub> (22,800) and effective prior to 01/2025, b) found in Table A-1 of Subpart A 40 CFR Part 98 (89 FR 31894) for each pollutant: CO<sub>2</sub> (1), N<sub>2</sub>O (265), CH<sub>4</sub> (28), SF<sub>6</sub> (23,500) and effective on or after 01/2025
- (4) Compliance with annual emission limits (tons per year) is based on a 12- month rolling period.
- (5) SF<sub>6</sub> NO<sub>2</sub>, CH<sub>4</sub>, and CO<sub>2</sub> emission rates are for informational purposes only and does not constitute an enforceable limit.

TBD Date:

State of Texas **County of Travis** 

I hereby certify this is a true and correct copy of a Texas Commission on Environmental Quality (TCEQ) document, which is filed in the Records of the Commission.

175173

# **Construction Permit** Source Analysis & Technical Reviewen under my hand and the seal of office.

Company

City

County

**Project Type** 

Site Name

Wolf Hollow II Power, LLC

Wolf Hollow II Power Plant

Granbury

**Jason La** 

Hood

Initial

**Permit Numbers** 

**Project Number Regulated Entity Number Customer Reference Number Received Date** 

te OHGPSØTX238prds Texas Commission STOTIXOP 38 al Quality 369521 RN108779729 CN604679639 January 25, 2024

#### **Project Overview**

**Project Reviewer** 

Wolf Hollow II Power LLC (Wolf Hollow) owns and operates the Wolf Hollow II electric generating facility located in Granbury, Hood County, Texas. The site currently consists of two natural gas-fired combustion turbine generators (CTGs), an auxiliary boiler, a dew point heater, emergency equipment, and fugitives authorized by Permit No. 83638.

Wolf Hollow is seeking authorization to expand the existing Wolf Hollow II Power Plant and will be referred to as Wolf Hollow III (WHIII). The WHIII expansion will include new equipment consisting of eight simple cycle combustion turbines, three emergency generators, diesel storage tanks, and fugitives.

#### **Emission Summary**

Air Contaminant	Current Allowable Emission Rates (tpy)	Proposed Allowable Emission Rates (tpy)	
NOx	4 - 7	251.49	
со		395.33	
VOC		12.30	
PM		56.18	
PM10		56.18	
PM <sub>2.5</sub>		56.18	
SO <sub>2</sub>		4.01	
H <sub>2</sub> SO <sub>4</sub>	-/	0.49	
H <sub>2</sub> CO		4.75	
N <sub>2</sub> O	-	1.47	
CH4		23.28	
SF <sub>6</sub>	X	<0.01	
CO <sub>2</sub>	-	795,579.38	
CO <sub>2e</sub> <sup>1</sup>		796,623.70	
CO <sub>2</sub> e <sup>2</sup>		796,645.54	

Note: SF6, NO2, CH4, and CO2 emission rates are for informational purposes only and does not constitute an enforceable limit. Carbon dioxide equivalents (CO2e) based on the following Global Warming Potentials (GWP): 1 found in Table A-1 of Subpart A 40 CFR Part 98 (78 FR 71904) for each pollutant: CO<sub>2</sub> (1), N<sub>2</sub>O (298), CH<sub>4</sub> (25), SF<sub>6</sub> (22,800) and effective prior to 01/2025. <sup>2</sup> found in Table A-1 of Subpart A 40 CFR Part 98 (89 FR 31894) for each pollutant: CO<sub>2</sub> (1), N<sub>2</sub>O (265), CH<sub>4</sub> (28), SF<sub>6</sub> (23,500) and effective on or after 01/2025.

#### **Compliance History Evaluation - 30 TAC Chapter 60 Rules**

A compliance history report was reviewed on:

Site rating & classification:

February 23, 2024

0.00 / High

# **Construction Permit** Source Analysis & Technical Review Permit Numbers: 175173, GHGPSDTX238, and PSDTX1636 Regular

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Regulated Entity No. RN108779729

Company rating & classification:	0.00 / High
Has the permit changed on the basis of the compliance history or rating?	No
Did the Regional Office have any comments? If so, explain.	No

# **Public Notice Information**

Requirement	Date	
Legislator letters mailed	February 1, 2024	
Date 1 <sup>st</sup> notice published	March 2, 2024	
Publication Name: Hood County News		
Pollutants: NO <sub>x</sub> , CO, PM, PM <sub>10</sub> , PM <sub>2.5</sub> , SO <sub>2</sub> , H <sub>2</sub> SO <sub>4</sub> , HAPs, SF <sub>6</sub> , GHG, and organic co	mpounds	
Date 1 <sup>st</sup> notice Alternate Language published	March 5, 2024	
Publication Name (Alternate Language): La Prensa Comunidad		
1 <sup>st</sup> public notice tearsheet(s) received	April 4, 2024	
1 <sup>st</sup> public notice affidavit(s) received	April 4, 2024	
1 <sup>st</sup> public notice certification of sign posting/application availability received	April 16, 2024	
SB709 Notification mailed	February 29, 2024, June 21 2024	
Date 2 <sup>nd</sup> notice published	August 10, 2024	
Publication Name: Hood County News		
Pollutants: NO <sub>x</sub> , CO, PM, PM <sub>10</sub> , PM <sub>2.5</sub> , SO <sub>2</sub> , H <sub>2</sub> SO <sub>4</sub> , HAPs, SF <sub>6</sub> , GHG, and organic co	mpounds	
Date 2 <sup>nd</sup> notice published (Alternate Language)	August 6, 2024	
Publication Name (Alternate Language): La Prensa Comunidad		
2 <sup>nd</sup> public notice tearsheet(s) received	August 13, 2024	
2 <sup>nd</sup> public notice affidavit(s) received	August 13, 2024	
2 <sup>nd</sup> public notice certification of sign posting/application availability received	September 12, 2024	

# Public Interest

Number of comments received	83
Number of meeting requests received	63
Number of hearing requests received	147
Date meeting held	September 09, 2024
Date response to comments filed with OCC	TBD
Date of SOAH hearing	TBD

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Regulated Entity No. RN108779729

Yes

No

Yes

#### Federal Rules Applicability

#### Requirement

Subject to NSPS?

Subparts A & GG

Subject to NESHAP?

Subject to NESHAP (MACT) for source categories?

Subparts **A & ZZZZ** 

**Nonattainment review applicability**: The site is an existing major source located in Hood County, which was designated as attainment for ozone. A nonattainment review is not applicable.

**PSD review applicability**: Plant III is in Hood County which is classified as attainment. The site is an existing major source with respect to the Prevention of Significant Deterioration (PSD) Program.

This project is a new source at an existing site, there are no changes in the contemporaneous period, and a baseline of zero was used for all pollutants. The new project will have the potential to emit emissions greater than the major modification significance level for the pollutants identified below. A minor NSR review was performed for all pollutants not triggering a federal review.

The following tables illustrate the annual project emissions for each pollutant and whether this pollutant triggers PSD review. These totals include MSS emissions.

Pollutant	Project Increase tpy	PSD Netting Trigger tpy	Netting Required tpy	Net Emission Change tpy	PSD Major Mod Trigger tpy	PSD Review Triggered Y/N
NOx	251.49	40	Y	NA	40	Y
CO	395.33	100	Y	NA	100	Y
VOC	12.30	40	Ν	NA	40	N
PM	56.18	25	Y	NA	25	Y
PM10	56.18	15	Ý	NA	15	Y
PM <sub>2.5</sub>	56.18	10	Y	NA	10	Y
SO <sub>2</sub>	4.01	40	N	NA	40	Ν
H <sub>2</sub> SO <sub>4</sub>	0.49	7	N	NA	7	N

#### **GHG PSD Major Modification Trigger**

Pollutant	Project Increase Tpy	GHG Netting Trigger Tpy	Netting Required Tpy	Net Emission Change Tpy	GHG Major Mod Trigger Tpy	GHG Review Triggered Y/N
GHG, CO <sub>2</sub> e <sup>1</sup>	796,623.70	75,000	Y	NA	75,000	Y
GHG, CO <sub>2</sub> e <sup>2</sup>	796,645.54	75,000	Y	NA	75,000	Y

Carbon dioxide equivalents ( $CO_{2e}$ ) based on the following Global Warming Potentials (GWP): <sup>1</sup> found in Table A-1 of Subpart A 40 CFR Part 98 (78 FR 71904) for each pollutant:  $CO_2$  (1),  $N_2O$  (298),  $CH_4$  (25),  $SF_6$  (22,800) and effective prior to 01/2025. <sup>2</sup> found in Table A-1 of Subpart A 40 CFR Part 98 (89 FR 31894) for each pollutant:  $CO_2$  (1),  $N_2O$  (265),  $CH_4$  (28),  $SF_6$  (23,500) and effective on or after 01/2025.

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#### Regulated Entity No. RN108779729

### Title V Applicability - 30 TAC Chapter 122 Rules

#### Requirement

Title V applicability: The site is an existing Title V major source and operates under O-3848.

**Periodic Monitoring (PM) applicability:** The site is a major and is subject to PM under 30 TAC Chapter 122. The following methods of monitoring meet PM requirements:

Source	EPN	SC No.	PM Condition Summary	
Turbines	SCT7 thru SCT14	5, 6, 7, 8, 10	Emission rates. Startup/Shutdown limitation. Reduced load authorization. Interrupted startup authorization. Annual operations limitation. GHG limitations. Visible emission observations and opacity limitation. Natural gas limitation.	
Diesel-Fired Generators	EGEN3 EGEN4 EGEN5	8, 9, 11	Visible emission observations and opacity limitation. Diesel generator annual hours of operations. Diesel fuel requirements.	
Fugitives	E-TRBMMP3	22	AVO for natural gas leaks.	
SF <sub>6</sub> Electrical Equipment	E-SF6FUG	23, 24	Circuit breaker check requirements.	
Maintenance	SCT7 thru SCT14 E-TRBMSSP3	-25	Monthly records of maintenance activities.	

**Compliance Assurance Monitoring (CAM) applicability:** The site is a major source subject to 30 TAC Chapter 122; however, there are no control devices in use. Therefore, CAM is not applicable.

#### **Process Description**

A CTG combusts natural gas to power a generator to produce electricity. The main components of a CTG consist of a compressor, combustor, turbine, and generator. The compressor pressurizes combustion air to the combustor where the fuel is mixed with the combustion air and burned. Hot pressurized exhaust gases then enter the power turbine where the gases expand across the turbine blades, driving a shaft to power an electric generator. Each of the proposed CTGs will be equipped with a lube oil recirculation system to lubricate moving parts of the turbines. Emissions of condensed lube oil droplets from the lube oil system will be exhausted through vapor extraction vents. Natural gas will be delivered to the site via pipeline, metered, and piped to the combustion turbines.

#### Project Scope

Wolf Hollow is seeking authorization to install and operate eight natural gas-fired, simple cycle combustion turbines at the existing Wolf Hollow II Power Plant and will be referred to as Wolf Hollow III (WHIII). The new units will be capable of generating approximately 44 MW each and are designed for peaking service, including daily startup and shutdown (SUSD) and extended periods of operation or non-operation. In addition to the power generating equipment, the ancillary equipment includes three emergency generators, diesel storage tanks, and fugitives.

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#### Regulated Entity No. RN108779729

#### **Best Available Control Technology**

BACT for the proposed project is summarized in the table below for each emitting source and the pollutants that triggered PSD review, which are NOx, CO, PM/PM<sub>10</sub>/PM<sub>2.5</sub>, and GHGs as CO<sub>2e</sub>. State minor BACT was also evaluated for the other pollutants that did not trigger PSD review and is also summarized in the table below. The applicant submitted RACT/BACT/LAER Clearinghouse (RBLC) database search summaries for the pollutants that triggered PSD review (NOx, CO, PM/PM<sub>10</sub>/PM<sub>2.5</sub>, and GHGs as CO<sub>2e</sub>), and these RBLC search summary results are included in the table below. The EPA has agreed to accept the TCEQ three-tier BACT approach as equivalent to the EPA top-down BACT approach for PSD review when the following are considered: recently issued/approved permits within the state of Texas; recently issued/approved permits in other states; and control technologies contained within the EPA's RBLC. BACT determinations are based upon an evaluation of information from the Environmental Protection Agency's (EPA's) RACT/BACT/LAER Clearinghouse (RBLC), TCEQ Current BACT Spreadsheet (June 2019), TCEQ Gas Turbine list (February 2022), on-going permitting in Texas and other states, and the TCEQ's continuing review of emissions control developments. The applicant fulfilled these requirements.

Source Name	EPN	Best Available Control Technology Description
		NO <sub>x</sub> : Dry low NOx (DLN) combustors will limit NO <sub>x</sub> emissions to 9.0 ppmvd corrected to 15 $\%$ O <sub>2</sub> on a rolling three-hour average. The RBLC search returned 50 projects for which natural gas-fired simple-cycle units were permitted between 2012 and 2021, with reported NO <sub>x</sub> emission limit.
		CO: Good combustion practices, and DLNs will limit CO to a level of 25.0 ppmvd on a rolling 3-hour average corrected to 15% O <sub>2</sub> . The proposed controls and emission limits are consistent with the expectations for control of CO for natural gas-fired combined cycle turbines and the result of the RBLC search returned reported CO emission limit; therefore, BACT is satisfied.
Simple-Cycle Combustion Turbine Generators	E-SCT7 through E-SCT14	VOC: Good combustion practices, DLNs, and an oxidation catalyst will limit VOC emissions to 2.0 ppmvd for both natural gas and diesel corrected to 15% O <sub>2</sub> on rolling three-hour average. The proposed controls and emission limits represent BACT.
		PM/PM <sub>10</sub> /PM <sub>2.5</sub> : PM/PM <sub>10</sub> /PM <sub>2.5</sub> is emitted from combustion processes due to the presence of ash and other inorganic constituents contained in the fuel, particulate matter in the inlet air, and incomplete combustion of the organic constituents in the fuel. PM/PM <sub>10</sub> /PM <sub>2.5</sub> emissions is due to incomplete combustion and are anticipated to be relatively low. A search of the RBLC and TCEQ Gas Turbine List shows that no add- on controls are required for natural gas-fired combustion turbines to control PM/PM <sub>10</sub> /PM <sub>2.5</sub> . Therefore, the use of good combustion practices to minimize emissions of particulate matter and the use of natural gas is BACT for PM/PM <sub>10</sub> /PM <sub>2.5</sub> .
		Sulfur Compound: Emissions of SO <sub>2</sub> occurs as a result of oxidation of sulfur in the natural gas-fired in the combustion turbines, with the majority of the sulfur converted to SO <sub>2</sub> . A portion of the SO <sub>2</sub> will be further converted to $H_2SO_4$ , with a conversion contribution due to the

# **Construction Permit** Source Analysis & Technical Review Permit Numbers: 175173, GHGPSDTX238, and PSDTX1636 Regular

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Source Name	EPN	Best Available Control Technology Description
		action of the SCR. The formation of SO2 and $H_2SO_4$ will be minimized by using pipeline-quality natural gas with a sulfur content not exceeding 1.0 grains sulfur per 100 standard cubic feet on an hourly/annual basis. Therefore, the proposed fuel and sulfur limits represented are BACT for SO <sub>2</sub> and $H_2SO_4$ .
		Greenhouses Gases (GHG): Simple cycle units serve a different purpose that the combined cycle turbine and their ability to quickly ramp up and down make them ideal for "peaking", quick ramping for use during periods with the highest electricity demand. Wolf Hollow proposing a limit per turbine of 1,482 lb CO <sub>2</sub> e/MWh and an operational limitation of 13,076,000MMBtu/yr (all turbines combined) firing on natural gas firing. A search of the RBLC and the TCEQ Gas Turbine List for facilities permitted since January 2012 to 2021 show that the CO <sub>2</sub> emission limits ranged from 1,276 to 1,707 lb/MWh. The proposed emission limit and operational limitation represents BACT. Maintenance, Startup, and Shutdown (MSS): Operation of the combustion turbines will result in emissions from startup and shutdown. The combustion turbines will be started up and shut down in a manner that minimizes the emissions during these events. The duration of each startup and shutdown is limited to 60 minutes. BACT will be achieved by minimizing the duration of the startup and shutdown events (consistent with market demands), engaging the pollution control equipment as soon as practicable (based on vendor recommendations and guarantees), and meeting the emissions limitations on the MAERT.
Turbine lube oil vent	ST-SCTLOV7 through ST-SCTLOV14	VOC: The heating of recirculating lubrication oil in the gas turbine generates oil vapor and oil condensate droplets in the oil reservoir compartments. The venting of turbine lubrication oil is a minor source of VOC and PM/PM <sub>10</sub> /PM <sub>2.5</sub> emissions, represented as <0.01 lb/hr and 0.01 tpy for VOC and <0.01 lb/hr and 0.01 tpy for PM/PM10/PM2.5. These emissions will be controlled with oil mist eliminators. PM/PM <sub>10</sub> /PM <sub>2.5</sub> The TCEQ does not provide Tier 1 BACT guidelines lube oil vent emissions. There is no process code associated with lube oil vents that can be searched in the RBLC. However, a search by the permit reviewer for simple cycle energy projects in the RBLC and a review of other available permits identified a recently permitted facility with lube oil vent listed as a process source. These recent RBLC determinations identify mist eliminators as the control method. The proposed use of mist eliminators satisfies BACT.
Diesel-Fired Generator	E-GEN3, E-GEN4, E-GEN5	BACT will be achieved through firing diesel fuel containing no more than 15 parts per million sulfur by weight, proper operation, maintenance, and limiting annual operation to 100 hours per year for each engine. The requirement of NSPS Subpart IIII does not apply since the engines were constructed prior to 07/11/2005. However, the engines will meet the Tier 1 Exhaust Standard for Generator Sets, 40 CFR 1039, Appendix I, and have a non-resettable runtime meter.
Diesel Storage Tanks	E-DSLTK3, E-DSLTK4,	BACT for fixed roof storage tanks with a capacity less than 25,000 gallons or containing a material with a true vapor pressure less than 0.5 psia is met by using

Permit Numbers: 175173, GHGPSDTX238, and PSDTX1636 Page 7 Regulated Entity No. RN108779729

Source Name	EPN	Best Available Control Technology Description
	E-DSLTK	submerged fill and uninsulated exterior surfaces exposed to the sun shall be white or aluminum. The diesel tanks have a max storage capacity of 1,900 gallons and will be storing ultra-low sulfur diesel (0.01 psia).
Fugitives	E-NGFUG-P3	Includes VOC which originate from the natural gas fuel lines. The uncontrolled VOC emissions are less than 10 tons per year and due to the negligible amount of GHG emissions from process fugitives, the only available control, implementation of a Leak Detection and Repair Program (LDAR), is not cost effective and would result in no significant reduction in overall project GHG emissions. Periodic audio/visual/olfactory inspections will be performed for natural gas. Any leaks will be repaired when detected. Therefore, BACT is satisfied.
MSS Fugitives	E-TRBMSSP3	Emissions associated with result from routine maintenance activities undertaken to ensure the proper operability of equipment. Good work practices and limiting the frequency and duration of maintenance activities represents BACT.
SF <sub>6</sub> Electrical Equipment	E-SF6FUG	The use of circuit breakers with totally enclosed insulation systems equipped with a low-pressure alarm/lockout is BACT.

Permits Incorporation – The are no Permit by Rule (PBR) / Standard Permit / Permit to be incorporated.

#### Impacts Evaluation

Was modeling conducted? Yes	Type of Modeling: AERMOD
Is the site within 3,000 feet of any school? No	
Additional site/land use information:	

The applicant provided an air quality analysis, which was audited by the TCEQ ADMT. The air quality analysis is acceptable for all review types and pollutants. More detailed information regarding the air quality analysis may be found in the ADMT modelling memo, ADMT Project No. 9320, dated July 23, 2024. The modeling results are summarized below.

#### **De Minimis Analysis**

A De Minimis analysis was initially conducted to determine if a full impacts analysis would be required. The De Minimis analysis modeling results indicate that 1-hr NO<sub>2</sub> and 24-hr and annual PM<sub>2.5</sub> (NAAQS [National Ambient Air Quality Standards] and Increment) exceed the respective de minimis concentrations and require a full impacts analysis. The De Minimis analysis modeling results for annual NO<sub>2</sub>, 1-hr and 8-hr CO and 24-hr and annual PM<sub>10</sub> indicate that the project is below the respective de minimis concentrations and no further analysis is required.

The justification for selecting EPA's interim 1-hr NO<sub>2</sub> De Minimis level is based on the assumptions underlying EPA's development of the 1-hr NO<sub>2</sub> De Minimis level. As explained in EPA guidance memoranda<sup>1</sup>, EPA believes it is reasonable as an interim approach to use a De Minimis level that represents 4% of the 1-hr NO<sub>2</sub> NAAQS.

The PM<sub>2.5</sub> and ozone De Minimis levels are EPA recommended De Minimis levels. The use of EPA recommended De Minimis levels is sufficient to conclude that a proposed source will not cause or contribute to a violation of an ozone and PM<sub>2.5</sub> NAAQS or PM<sub>2.5</sub> Prevention of Significant Deterioration (PSD) increments based on the analyses documented in EPA guidance and policy memoranda<sup>2</sup>.

While the De Minimis levels for both the NAAQS and increment are identical for  $PM_{2.5}$  in the table below, the procedures to determine significance (that is, predicted concentrations to compare to the De Minimis levels) are different. This

<sup>1</sup> www.tceq.texas.gov/assets/public/permitting/air/memos/guidance\_1hr\_no2naaqs.pdf

<sup>2</sup> www.tceq.texas.gov/permitting/air/modeling/epa-mod-guidance.html

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difference occurs because the NAAQS for PM2.5 are statistically-based, but the corresponding increments are exceedance-based.

Pollutant	Averaging Time	GLCmax <sup>3</sup> (µg/m <sup>3</sup> )	De Minimis (µg/m³)
<b>PM</b> <sub>10</sub>	24-hr	1.83	5
PM10	Annual	0.36	1
PM <sub>2.5</sub> (NAAQS)	24-hr	1.35	1.2
PM <sub>2.5</sub> (NAAQS)	Annual	0.34	0.13
PM <sub>2.5</sub> (Increment)	24-hr	1.83	1.2
PM <sub>2.5</sub> (Increment)	Annual	0.36	0.13
NO <sub>2</sub>	1-hr	35	7.5
NO <sub>2</sub>	Annual	0.58	1
СО	1-hr	181	2000
СО	8-hr	19	500

.....

The 24-hr and annual PM2.5 (NAAQS) and 1-hr NO2 GLCmax are based on the highest five-year averages of the maximum predicted concentrations determined for each receptor. The GLCmax for all other pollutants and averaging times represent the maximum predicted concentrations over five years of meteorological data.

EPA intermittent guidance was relied on for the 1-hr NO<sub>2</sub> PSD De Minimis and NAAQS analyses. Refer to the Modeling Emissions Inventory section for details.

To evaluate secondary PM<sub>2.5</sub> impacts, the applicant provided an analysis based on a Tier 1 demonstration approach consistent with EPA's Guideline on Air Quality Models (GAQM). Specifically, the applicant used a Tier 1 demonstration tool developed by EPA referred to as Modeled Emission Rates for Precursors (MERPs). The basic idea behind the MERPs is to use technically credible air quality modeling to relate precursor emissions and peak secondary pollutants impacts from a source. Using data associated with the 500 tpy Parker County source, the applicant estimated 24-hr and annual secondary PM<sub>2.5</sub> concentrations of 0.25 µg/m<sup>3</sup> and 0.005 µg/m<sup>3</sup>, respectively. Since the combined direct and secondary 24-hr and annual PM<sub>2.5</sub> impacts are above the De minimis levels, a full impacts analysis is required.

Modeling Results for Ozone FSD De Minimus Analysis in Faits per Dimon (pp.	Modeling	g Results for C	Dzone PSD De	Minimis Ana	lysis in Parts	per Billion (ppb
----------------------------------------------------------------------------	----------	-----------------	--------------	-------------	----------------	------------------

Pollutant	Averaging Time	GLCmax (ppb)	De Minimis (ppb)
O <sub>3</sub>	8-hr	0.989	1

<sup>3</sup> Ground level maximum concentration

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The applicant performed an  $O_3$  analysis as part of the PSD AQA. The applicant evaluated project emissions of  $O_3$  precursor emissions (NO<sub>X</sub> and VOC). For the project NO<sub>X</sub> and VOC emissions, the applicant provided an analysis based on a Tier 1 demonstration approach consistent with EPA's GAQM. Specifically, the applicant used a Tier 1 demonstration tool developed by the EPA referred to as MERPs. Using data associated with the 500 tpy Parker County source, the applicant estimated an 8-hr O<sub>3</sub> concentration of 0.989 ppb. When the estimates of ozone concentrations from the project emissions are added together, the results are less than the De Minimis level.

# **Air Quality Monitoring**

The De Minimis analysis modeling results indicate that 24-hr PM<sub>10</sub>, annual NO<sub>2</sub>, and 8-hr CO are below their respective monitoring significance level.

Pollutant	Averaging Time	GLCmax (µg/m <sup>3</sup> )	Significance (µg/m³)
PM <sub>10</sub>	24-hr	1.83	10
NO <sub>2</sub>	Annual	0.58	14
СО	8-hr	19	575

### Modeling Results for PSD Monitoring Significance Levels

The GLCmax represent the maximum predicted concentrations over five years of meteorological data.

The applicant evaluated ambient PM<sub>2.5</sub> monitoring data to satisfy the requirements for the pre-application air quality analysis.

Background concentrations for PM<sub>2.5</sub> were obtained from the EPA AIRS monitor 481390016 located at 2725 Old Fort Worth Rd., Midlothian, Ellis County. The three-year average (2019-2021) of the 98th percentile of the annual distribution of the 24-hr concentrations was used for the 24-hr value (17.51 ug/m<sup>3</sup>). The three-year average (2019-2021) of the annual concentrations was used for the annual value (7.78 ug/m<sup>3</sup>). The use of this monitor is reasonable based on a comparison of county-wide emissions, population, and a quantitative review of emissions sources in the surrounding area of the monitor site relative to the project site. Please note that the selected monitor was discontinued April 2022. Although the data relied on is older, the applicant noted that data from this representative monitoring station located within the same airshed offers background concentrations estimates that are more representative to the site location than selecting alternative data from a monitor outside the airshed or state. These background concentrations were also used as part of the NAAQS analysis.

Since the project has a net emissions increase of 100 tpy or more of VOC or NO<sub>X</sub>, the applicant evaluated ambient O<sub>3</sub> monitoring data to satisfy the requirements for the pre-application air quality analysis.

Background concentrations for ozone were obtained from EPA AIRS monitor 482210001 located at 200 N Gordon St., Granbury, Hood County. The applicant used the three-year average (2021-2023) of the annual fourth highest daily maximum 8-hr concentrations in the analysis (76 ppb). This monitor is reasonable based on the applicant's quantitative review of emissions sources in the surrounding area of the monitor site relative to the project site and proximity of the monitor to the project site (approximately 12.5 kilometers (km) northwest). The proposed project is located in an attainment area for ozone and is required to obtain a PSD permit<sup>4</sup>. The PSD permitting program requires that proposed new major stationary sources and major modifications must demonstrate that the emissions from the proposed source or modification will not cause or contribute to a violation of any NAAQS<sup>5</sup>. The predicted concentrations in Table 2 demonstrate the proposed project would not cause or contribute to a violation of the NAAQS.

<sup>4</sup> October 26, 2015 Federal Register (80 FR 65292)

<sup>5 40</sup> Code of Federal Regulations (CFR) 52.21(k)

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#### Regulated Entity No. RN108779729

### National Ambient Air Quality Standard (NAAQS) Analysis

The De Minimis analysis modeling results indicate that 24-hr and annual PM<sub>2.5</sub> and 1-hr NO<sub>2</sub> exceed the respective de minimis concentration and require a full impacts analysis. The full NAAQS modeling results indicate the total predicted concentrations will not result in an exceedance of the NAAQS.

Pollutant	Averaging Time	GLCmax (µg/m³)	Background (μg/m³)	Total Conc. = [Background + GLCmax] (μg/m³)	Standard (µg/m³)
PM <sub>2.5</sub>	24-hr	4.03	17.51	21.54	35
PM <sub>2.5</sub>	Annual	0.66	7.78	8.44	9
NO <sub>2</sub>	1-hr	164.33	See background discussion below	164.33	188

The 24-hr PM<sub>2.5</sub> GLCmax is the highest five-year average of the 98th percentile of the annual distribution of predicted 24hr concentrations determined for each receptor. The annual PM<sub>2.5</sub> GLCmax is the maximum five-year average of the annual concentrations determined for each receptor. The 1-hr NO<sub>2</sub> GLCmax is the highest five-year average of the 98th percentile of the annual distribution of predicted daily maximum 1-hr concentrations determined for each receptor.

Background concentrations for NO<sub>2</sub> were obtained from the EPA AIRS monitor 483491051 at Corsicana Airport, Corsicana, Navarro County. For the 1-hr NO<sub>2</sub> NAAQS analysis, the applicant conducted the evaluation by combining NO<sub>2</sub> background concentrations with the predicted concentrations on a seasonal-hour of day basis for each modeled receptor. The applicant followed EPA guidance when developing seasonal-hour of day background concentrations. The seasonalhour of day background concentrations were based on the three-year average (2020-2022) of the 98th percentile of the annual distribution of the maximum daily 1-hr concentrations for each season and hour of day. These background values were then used in the model (as background scalars) to be combined with model predictions giving a total predicted concentration. Monitoring data for 2023 are available but less than 50% complete for the second quarter and could not be validated since it does not meet the EPA's requirement for completeness to use the substitution test; however, ADMT reviewed the available monitoring data and verified that the background concentrations used are comparable to the recent data and relying on complete data is reasonable. The use of this monitor is reasonable based on a comparison of countywide emissions, population, and a quantitative review of emissions sources in the surrounding area of the monitor site relative to the project site.

As stated above, to evaluate secondary  $PM_{2.5}$  impacts, the applicant provided an analysis based on a Tier 1 demonstration approach consistent with EPA's GAQM. Specifically, the applicant used a Tier 1 demonstration tool developed by EPA referred to as MERPs. Using data associated with the 500 tpy Parker County source, the applicant estimated 24-hr and annual secondary  $PM_{2.5}$  concentrations of 0.25 µg/m<sup>3</sup> and 0.005 µg/m<sup>3</sup>, respectively. When these estimates are added to the GLCmax listed in Table 4 above, the results are less than the NAAQS.

#### Increment Analysis

The De Minimis analysis modeling results indicate that 24-hr and annual PM<sub>2.5</sub> exceed the respective de minimis concentrations and require a PSD increment analysis.

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Pollutant	Averaging Time	GLCmax (µg/m³)	Increment (µg/m³)
PM <sub>2.5</sub>	24-hr	6.63	9
PM <sub>2.5</sub>	Annual	0.71	4

#### **Results for PSD Increment Analysis**

The GLCmax for 24-hr PM<sub>2.5</sub> is the maximum high, second high (H2H) predicted concentration across five years of meteorological data. For annual PM<sub>2.5</sub>, the GLCmax represents the maximum predicted concentration over five years of meteorological data.

The GLCmax for 24-hr and annual PM<sub>2.5</sub> reported in the table above represent the total predicted concentrations associated with modeling the direct PM<sub>2.5</sub> emissions and the contributions associated with secondary PM<sub>2.5</sub> formation (discussed above in the NAAQS Analysis section).

### **Additional Impacts Analysis**

The applicant performed an Additional Impacts Analysis as part of the PSD AQA. The applicant conducted a growth analysis and determined that population will not significantly increase as a result of the proposed project. The applicant conducted a soils and vegetation analysis and determined that all evaluated criteria pollutant concentrations are below their respective secondary NAAQS. The applicant meets the Class II visibility analysis requirement by complying with the opacity requirements of 30 Texas Administrative Code Chapter 111. The Additional Impacts Analyses are reasonable and possible adverse impacts from this project are not expected.

The ADMT evaluated predicted concentrations from the proposed project to determine if emissions could adversely affect a Class I area. The nearest Class I area, Wichita Mountains Wildlife Refuge, is located approximately 277 km from the proposed site.

The H<sub>2</sub>SO<sub>4</sub> 24-hr maximum predicted concentration of 0.04  $\mu$ g/m<sup>3</sup> occurred within the noncontiguous property to the north of Mitchel Bend Highway (approximately 365 meters to the north of the project boundary). The H<sub>2</sub>SO<sub>4</sub> 24-hr maximum predicted concentration occurring at the edge of the receptor grid, 30 km from the proposed sources, in the direction of the Wichita Mountains Wildlife Refuge Class I area is 0.004  $\mu$ g/m<sup>3</sup>. The Wichita Mountains Wildlife Refuge Class I area is an additional 247 km from the edge of the receptor grid. Therefore, emissions of H<sub>2</sub>SO<sub>4</sub> from the proposed project are not expected to adversely affect the Wichita Mountains Wildlife Refuge Class I area.

The predicted concentrations of 24-hr and annual  $PM_{10}$ , 24-hr and annual  $PM_{2.5}$ , annual  $NO_2$ , and 1-hr and 3-hr  $SO_2$  are all less than de minimis levels at a distance of one km from the proposed sources in the direction the Wichita Mountains Wildlife Refuge Class I area. The predicted concentrations of 1-hr  $NO_2$  are greater than de minimis levels at a distance of 50 km from the proposed sources to the west of the project site; however, this will not adversely affect the Class I area since the concentrations decrease with distance, and the Class I area is an additional 227 km to the north. In addition, the  $NO_2$  1-hr maximum predicted concentration occurring at the edge of the receptor grid, 50 km from the proposed sources, in the direction of the Wichita Mountains Wildlife Refuge Class I area is 3.39  $\mu$ g/m<sup>3</sup>, which is de minimis. As noted, the Wichita Mountains Wildlife Refuge Class I area is an additional 227 km from the edge of the receptor grid. Therefore, emissions from the proposed project are not expected to adversely affect the Wichita Mountains Wildlife Refuge Class I area is an additional 227 km from the edge of the receptor grid. Therefore, emissions from the proposed project are not expected to adversely affect the Wichita Mountains Wildlife Refuge Class I area is an additional 227 km from the edge of the receptor grid. Therefore, emissions from the proposed project are not expected to adversely affect the Wichita Mountains Wildlife Refuge Class I area.

# Minor Source NSR and Air Toxics Analysis

### Project-Related Modeling Results for State Property Line

Pollutant	Averaging Time	GLCmax (μg/m³)	De Minimis (µg/m³)
SO <sub>2</sub>	1-hr	1.87	20.42

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Pollutant	utant Averaging Time GLCmax (µg/m <sup>3</sup> )		De Minimis (µg/m³)
$H_2SO_4$	1-hr	0.23	1
$H_2SO_4$	24-hr	0.04	0.3

### Modeling Results for Minor NSR De Minimis

Pollutant	Averaging Time	GLCmax (µg/m <sup>3</sup> )	De Minimis (µg/m³)	
SO <sub>2</sub>	1-hr	1.87	7.8	
SO <sub>2</sub>	3-hr	1.06	25	

The GLCmax are the maximum predicted concentrations associated with one year of meteorological data.

EPA intermittent guidance was relied on for the 1-hr SO<sub>2</sub> De Minimis analysis. Refer to the Modeling Emissions Inventory section for details.

The justification for selecting EPA's interim 1-hr SO<sub>2</sub> De Minimis level was based on the assumptions underlying EPA's development of the 1-hr SO<sub>2</sub> De Minimis level. As explained in EPA guidance memoranda<sup>6</sup>, EPA believes it is reasonable as an interim approach to use a De Minimis level that represents 4% of the 1-hr SO<sub>2</sub> NAAQS.

#### Minor NSR Project (Increases Only) Modeling Results for Health Effects

Pollutant & CAS# <sup>7</sup>	Averaging Time	GLCmax (µg/m³)	10% ESL <sup>8</sup> (µg/m <sup>3</sup> )
formaldehyde 50-00-0	1-hr	0.73	1.5
n-hexane 110-54-3	1-hr	0.23	560
n-hexane 110-54-3	Annual	<0.01	20

#### Minor NSR Site-Wide Modeling Results for Health Effects

Pollutant	CAS#	Averaging Time	GLCmax (µg/m³)	GLCmax Location	ESL (µg/m³)
fuel oil No. 2	68476-30-2	1-hr	557	W Property Line	1000

#### **MERA Summary**

The applicant provided a health effects review as specified in the TCEQ's Modelling and Effects Review Applicability (MERA) guidance (APDG 5874 dated March 2018) for project emission increases of non-criteria pollutants. The project emissions of non-criteria pollutants listed below satisfy the MERA and are protective of human health and the environment.

<sup>6</sup> www.epa.gov/sites/production/files/2015-07/documents/appwso2.pdf

<sup>7</sup> Chemical Abstract Service Number

<sup>8</sup> Effects Screening Level

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Pollutant & CAS#	Averaging Time	GLC <sub>max</sub> (µg/m <sup>3</sup> )	ESL (µg/m³)	Modelling and Effects Review Applicability (MERA) Step in Which Pollutant Screened Out
Propane	1-hr	N/A	N/A	Sten () _ simple asphyviate
74-98-6	Annual	N/A	N/A	Step 0 – simple asphyriate
Propylene	1-hr	N/A	N/A	Step $0 - simple asphyviate$
115-07-1	Annual	N/A	N/A	Step 0 – simple asphysiate
n-Butane 106-97-8	1-hr	N/A	66,000	Step 2 – long-term ESL $\ge$ 10% of short-term ESL, short-term ESL is greater than 3,500 µg/m <sup>3</sup> and production emissions increase $\le$ 0.4 lb/hr
	Annual	N/A	7100	Step 0 – long-term ESL ≥ 10% of short-term ESL
n-Pentane 109-66-0	1-hr	N/A	59,000	Step 2 – long-term ESL $\ge$ 10% of short-term ESL, short-term ESL is greater than 3,500 µg/m <sup>3</sup> and production emissions increase $\le$ 0.4 lb/hr
	Annual	N/A	7100	Step 0 – long-term ESL ≥ 10% of short-term ESL
n-hexane	1-hr	0.23	5600	Stop 3 CI Cmay $< 10\%$ ESI
110-54-3	Annual	<0.01	200	Step 5 - GEOMAX < 10% ESE
Formaldehyde	1-hr	0.73	15	Step 3 – GLCmax < 10% ESL
50-00-0	Annual	N/A	3.3	Step 0 - Long-term ESL ≥ 10% of short-term ESL
Fuel oil No. 2	1-hr	556.53	1000	Step 7 – Sitewide modeling deemed
68476-30-2	Annual	0.06	100	acceptable by ADMT

Health Effects Review - Minor NSR Project-Related Results

Thus, the applicant has demonstrated that the proposed project's emissions will not adversely affect public health and welfare, which includes NAAQS, additional impacts, minor new source review of regulated pollutants without a NAAQS, and air toxics review. The proposed increases in health effects pollutants will not cause or contribute to any federal or state exceedances. Therefore, emissions from the facility are not expected to have an adverse impact on public health or the environment.

DRAFT

Project Reviewer Jason La Date

Section Manager Kristyn Campbell Date

State of Texas County of Travis

APR 1 5 2025

I hereby certify this is a true and correct copy of a Texas Commission on Environmental Quality (TCEQ)

Given under my hand and the seal of office.

document, which is filed in the Records of the Commission.

Alternative Custodian of Records exas Commission on Environmental Quality

# **TCEQ Interoffice Memorandum**

To:	Ruth Alvirez
	Energy Section

- Thru: Chad Dumas, Team Leader Air Dispersion Modeling Team (ADMT)
- From: Justin Cherry, P.E. ADMT

Date: May 30, 2024

#### Subject: Air Quality Analysis Audit – Wolf Hollow II Power, LLC (RN108779729)

#### 1. Project Identification Information

Permit Application Number: 175173 NSR Project Number: 369521 ADMT Project Number: 9203 County: Hood Published Map: <u>\\tceq4avmgisdata\GISWRK\APD\MODEL PROJECTS\9203\9203.pdf</u>

Air Quality Analysis: Submitted by POWER Engineers, Inc., May 2024, on behalf of Wolf Hollow II Power, LLC. Additional information was provided May 2024.

#### 2. Report Summary

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

#### A. De Minimis Analysis

A De Minimis analysis was initially conducted to determine if a full impacts analysis would be required. The De Minimis analysis modeling results indicate that 1-hr NO<sub>2</sub> and 24-hr and annual  $PM_{2.5}$  (NAAQS and Increment) exceed the respective de minimis concentrations and require a full impacts analysis. The De Minimis analysis modeling results for annual NO<sub>2</sub>, 1-hr and 8-hr CO and 24-hr and annual  $PM_{10}$  indicate that the project is below the respective de minimis concentrations and no further analysis is required.

The justification for selecting EPA's interim 1-hr NO<sub>2</sub> De Minimis level is based on the assumptions underlying EPA's development of the 1-hr NO<sub>2</sub> De Minimis level. As explained in EPA guidance memoranda<sup>1</sup>, EPA believes it is reasonable as an interim approach to use a De Minimis level that represents 4% of the 1-hr NO<sub>2</sub> NAAQS.

The PM<sub>2.5</sub> and ozone De Minimis levels are EPA recommended De Minimis levels. The use of EPA recommended De Minimis levels is sufficient to conclude that a proposed source will not cause or contribute to a violation of an ozone and PM<sub>2.5</sub> NAAQS or PM<sub>2.5</sub> Prevention of Significant Deterioration (PSD) increments based on the analyses documented in EPA guidance and policy memoranda<sup>2</sup>.

While the De Minimis levels for both the NAAQS and increment are identical for PM<sub>2.5</sub> in the table below, the procedures to determine significance (that is, predicted concentrations to compare to the De Minimis levels) are different. This difference occurs because the

<sup>&</sup>lt;sup>1</sup> www.tceq.texas.gov/assets/public/permitting/air/memos/guidance\_1hr\_no2naaqs.pdf

<sup>&</sup>lt;sup>2</sup> www.tceq.texas.gov/permitting/air/modeling/epa-mod-guidance.html

NAAQS for  $PM_{2.5}$  are statistically-based, but the corresponding increments are exceedance-based.

Pollutant	Averaging Time	GLCmax (µg/m <sup>3</sup> )	De Minimis (μg/m³)
PM10	24-hr	1.83	5
PM <sub>10</sub>	Annual	0.36	1
PM <sub>2.5</sub> (NAAQS)	24-hr	1.35	1.2
PM <sub>2.5</sub> (NAAQS)	Annual	0.34	0.13
PM <sub>2.5</sub> (Increment)	24-hr	1.83	1.2
PM <sub>2.5</sub> (Increment)	Annual	0.36	0.13
NO <sub>2</sub>	1-hr	35	7.5
NO <sub>2</sub>	Annual	0.58	1
со	1-hr	181	2000
со	8-hr	19	500

Table 1. Modeling Results for PSD De Minimis Analysis in Micrograms Per Cubic Meter (μg/m<sup>3</sup>)

The 24-hr and annual PM<sub>2.5</sub> (NAAQS) and 1-hr NO<sub>2</sub> GLCmax are based on the highest five-year averages of the maximum predicted concentrations determined for each receptor. The GLCmax for all other pollutants and averaging times represent the maximum predicted concentrations over five years of meteorological data.

EPA intermittent guidance was relied on for the 1-hr NO<sub>2</sub> PSD De Minimis and NAAQS analyses. Refer to the Modeling Emissions Inventory section for details.

To evaluate secondary PM<sub>2.5</sub> impacts, the applicant provided an analysis based on a Tier 1 demonstration approach consistent with EPA's Guideline on Air Quality Models (GAQM). Specifically, the applicant used a Tier 1 demonstration tool developed by EPA referred to as Modeled Emission Rates for Precursors (MERPs). The basic idea behind the MERPs is to use technically credible air quality modeling to relate precursor emissions and peak secondary pollutants impacts from a source. Using data associated with the 500 tpy Parker County source, the applicant estimated 24-hr and annual secondary PM<sub>2.5</sub> concentrations of 0.25  $\mu$ g/m<sup>3</sup> and 0.005  $\mu$ g/m<sup>3</sup>, respectively. Since the combined direct and secondary 24-hr and annual PM<sub>2.5</sub> impacts are above the De minimis levels, a full impacts analysis is required.

Pollutant	Averaging Time	GLCmax (ppb)	De Minimis (ppb)
O3	8-hr	0.989	1

Table 2. Modeling Results for Ozone PSD De Minimis Analysisin Parts per Billion (ppb)

The applicant performed an  $O_3$  analysis as part of the PSD AQA. The applicant evaluated project emissions of  $O_3$  precursor emissions (NO<sub>x</sub> and VOC). For the project NO<sub>x</sub> and VOC emissions, the applicant provided an analysis based on a Tier 1 demonstration approach consistent with EPA's GAQM. Specifically, the applicant used a Tier 1 demonstration tool developed by the EPA referred to as MERPs. Using data associated with the 500 tpy Parker County source, the applicant estimated an 8-hr  $O_3$  concentration of 0.989 ppb. When the estimates of ozone concentrations from the project emissions are added together, the results are less than the De Minimis level.

### B. Air Quality Monitoring

The De Minimis analysis modeling results indicate that 24-hr  $PM_{10}$ , annual  $NO_2$ , and 8-hr CO are below their respective monitoring significance level.

Pollutant	Averaging Time	GLCmax (µg/m³)	Significance (µg/m³)
PM <sub>10</sub>	24-hr	1.83	10
NO <sub>2</sub>	Annual	0.58	14
со	8-hr	19	575

 Table 3. Modeling Results for PSD Monitoring Significance Levels

The GLCmax represent the maximum predicted concentrations over five years of meteorological data.

The applicant evaluated ambient  $PM_{2.5}$  monitoring data to satisfy the requirements for the pre-application air quality analysis.

Background concentrations for PM<sub>2.5</sub> were obtained from the EPA AIRS monitor 481390016 located at 2725 Old Fort Worth Rd., Midlothian, Ellis County. The three-year average (2019-2021) of the 98th percentile of the annual distribution of the 24-hr concentrations was used for the 24-hr value (17.51 ug/m<sup>3</sup>). The three-year average (2019-2021) of the annual concentrations was used for the annual value (7.78 ug/m<sup>3</sup>). The use of this monitor is reasonable based on a comparison of county-wide emissions, population, and a quantitative review of emissions sources in the surrounding area of the monitor site relative to the project site. Please note that the selected monitor was discontinued April 2022. Although the data relied on is older, the applicant noted that data from this representative monitoring station located within the same airshed offers background concentrations estimates that are more representative to the site location than selecting alternative data from a monitor outside the airshed or state. These background concentrations were also used as part of the NAAQS analysis.

Since the project has a net emissions increase of 100 tpy or more of VOC or NO<sub>X</sub>, the applicant evaluated ambient O<sub>3</sub> monitoring data to satisfy the requirements for the pre-application air quality analysis.

Background concentrations for ozone were obtained from the EPA AIRS monitor 482210001 located at 200 N Gordon St., Granbury, Hood County. The applicant used the three-year average (2021-2023) of the annual fourth highest daily maximum 8-hr concentrations in the analysis (76 ppb). This monitor is reasonable based on the applicant's quantitative review of emissions sources in the surrounding area of the monitor site relative to the project site and proximity of the monitor to the project site (approximately 12.5 kilometers (km) northwest). The proposed project is located in an attainment area for ozone and is required to obtain a PSD permit<sup>3</sup>. The PSD permitting program requires that proposed new major stationary sources and major modifications must demonstrate that the emissions from the proposed source or modification will not cause or contribute to a violation of any NAAQS<sup>4</sup>. The predicted concentrations in Table 2 demonstrate the proposed project would not cause or contribute to a violation of the NAAQS.

# C. National Ambient Air Quality Standard (NAAQS) Analysis

The De Minimis analysis modeling results indicate that 24-hr and annual  $PM_{2.5}$  and 1-hr  $NO_2$  exceed the respective de minimis concentration and require a full impacts analysis. The full NAAQS modeling results indicate the total predicted concentrations will not result in an exceedance of the NAAQS.

Pollutant	Averaging Time	GLCmax (µg/m³)	Background (µg/m³)	Total Conc. = [Background + GLCmax] (µg/m³)	Standard (µg/m³)
PM <sub>2.5</sub>	24-hr	4.03	17.51	21.54	35
PM <sub>2.5</sub>	Annual	0.66	7.78	8.44	9
NO <sub>2</sub>	1-hr	164.33	See background discussion below	164.33	188

Table 4. Total Concentrations for PSD NAAQS (Concentrations > De Minimis)

The 24-hr PM<sub>2.5</sub> GLCmax is the highest five-year average of the 98th percentile of the annual distribution of predicted 24-hr concentrations determined for each receptor. The annual PM<sub>2.5</sub> GLCmax is the maximum five-year average of the annual concentrations determined for each receptor. The 1-hr NO<sub>2</sub> GLCmax is the highest five-year average of the 98th percentile of the annual distribution of predicted daily maximum 1-hr concentrations determined for each receptor.

Background concentrations for NO<sub>2</sub> were obtained from the EPA AIRS monitor 483491051 at Corsicana Airport, Corsicana, Navarro County. For the 1-hr NO<sub>2</sub> NAAQS analysis, the applicant conducted the evaluation by combining NO<sub>2</sub> background concentrations with the predicted concentrations on a seasonal-hour of day basis for each modeled receptor. The applicant followed EPA guidance when developing seasonal-hour of day background concentrations. The seasonal-hour of day background concentrations were based on the three-year average (2020-2022) of the 98<sup>th</sup> percentile of the annual distribution of the maximum daily 1-hr concentrations for each season and hour of day. These background values were then used in the model (as background scalars) to be combined with model predictions giving a total predicted concentration. Monitoring data for 2023 are available but less than 50% complete for the second quarter and could not be validated since it does not

<sup>&</sup>lt;sup>3</sup> October 26, 2015 *Federal Register* (80 FR 65292) <sup>4</sup> 40 Code of Federal Regulations (CFR) 52.21(k)

meet the EPA's requirement for completeness to use the substitution test; however, the ADMT reviewed the available monitoring data and verified that the background concentrations used are comparable to the recent data and relying on complete data is reasonable. The use of this monitor is reasonable based on a comparison of county-wide emissions, population, and a quantitative review of emissions sources in the surrounding area of the monitor site relative to the project site.

As stated above, to evaluate secondary PM<sub>2.5</sub> impacts, the applicant provided an analysis based on a Tier 1 demonstration approach consistent with EPA's GAQM. Specifically, the applicant used a Tier 1 demonstration tool developed by EPA referred to as MERPs. Using data associated with the 500 tpy Parker County source, the applicant estimated 24-hr and annual secondary PM<sub>2.5</sub> concentrations of 0.25  $\mu$ g/m<sup>3</sup> and 0.005  $\mu$ g/m<sup>3</sup>, respectively. When these estimates are added to the GLCmax listed in Table 4 above, the results are less than the NAAQS.

# D. Increment Analysis

The De Minimis analysis modeling results indicate that 24-hr and annual PM<sub>2.5</sub> exceed the respective de minimis concentrations and require a PSD increment analysis.

Pollutant	Averaging Time	GLCmax (µg/m <sup>3</sup> )	Increment (µg/m³)
PM <sub>2.5</sub>	24-hr	6.63	9
PM <sub>2.5</sub>	Annual	0.71	4

Table 5. Results for PSD Increment Analysis

The GLCmax for 24-hr PM<sub>2.5</sub> is the maximum high, second high (H2H) predicted concentration across five years of meteorological data. For annual PM<sub>2.5</sub>, the GLCmax represents the maximum predicted concentration over five years of meteorological data.

The GLCmax for 24-hr and annual  $PM_{2.5}$  reported in the table above represent the total predicted concentrations associated with modeling the direct  $PM_{2.5}$  emissions and the contributions associated with secondary  $PM_{2.5}$  formation (discussed above in the NAAQS Analysis section).

# E. Additional Impacts Analysis

The applicant performed an Additional Impacts Analysis as part of the PSD AQA. The applicant conducted a growth analysis and determined that population will not significantly increase as a result of the proposed project. The applicant conducted a soils and vegetation analysis and determined that all evaluated criteria pollutant concentrations are below their respective secondary NAAQS. The applicant meets the Class II visibility analysis requirement by complying with the opacity requirements of 30 TAC Chapter 111. The Additional Impacts Analyses are reasonable and possible adverse impacts from this project are not expected.

The ADMT evaluated predicted concentrations from the proposed project to determine if emissions could adversely affect a Class I area. The nearest Class I area, Wichita Mountains Wildlife Refuge, is located approximately 277 km from the proposed site.

The H<sub>2</sub>SO<sub>4</sub> 24-hr maximum predicted concentration of 0.04  $\mu$ g/m<sup>3</sup> occurred within the noncontiguous property to the north of Mitchel Bend Highway (approximately 365 meters to the north of the project boundary). The H<sub>2</sub>SO<sub>4</sub> 24-hr maximum predicted concentration
occurring at the edge of the receptor grid, 30 km from the proposed sources, in the direction of the Wichita Mountains Wildlife Refuge Class I area is 0.004  $\mu$ g/m<sup>3</sup>. The Wichita Mountains Wildlife Refuge Class I area is an additional 247 km from the edge of the receptor grid. Therefore, emissions of H<sub>2</sub>SO<sub>4</sub> from the proposed project are not expected to adversely affect the Wichita Mountains Wildlife Refuge Class I area.

The predicted concentrations of 24-hr and annual  $PM_{10}$ , 24-hr and annual  $PM_{2.5}$ , annual  $NO_2$ , and 1-hr and 3-hr  $SO_2$  are all less than de minimis levels at a distance of one km from the proposed sources in the direction the Wichita Mountains Wildlife Refuge Class I area. The predicted concentrations of 1-hr  $NO_2$  are greater than de minimis levels at a distance of 50 km from the proposed sources to the west of the project site; however, this will not adversely affect the Class I area since the concentrations decrease with distance, and the Class I area is an additional 227 km to the north. In addition, the  $NO_2$  1-hr maximum predicted concentration occurring at the edge of the receptor grid, 50 km from the proposed sources, in the direction of the Wichita Mountains Wildlife Refuge Class I area is 3.39  $\mu g/m^3$ , which is de minimis. As noted, the Wichita Mountains Wildlife Refuge Class I area is an additional 227 km from the edge of the receptor grid. Therefore, emissions from the proposed project are not expected to adversely affect the Wichita Mountains Wildlife Refuge Class I area is an additional 227 km from the edge of the receptor grid. Therefore, emissions from the proposed project are not expected to adversely affect the Wichita Mountains Wildlife Refuge Class I area.

# F. Minor Source NSR and Air Toxics Analysis

Pollutant	Averaging Time	GLCmax (µg/m <sup>3</sup> )	De Minimis (µg/m³)
SO <sub>2</sub>	1-hr	1.87	20.42
H <sub>2</sub> SO <sub>4</sub>	1-hr	0.23	1
H <sub>2</sub> SO <sub>4</sub>	24-hr	0.04	0.3

Table 6. Project-Related Modeling Results for State Property Line

Та	ble 7. Modeling Resu	Its for Minor NSR De	Minimis

Pollutant	Averaging Time	GLCmax (µg/m³)	De Minimis (µg/m³)
SO <sub>2</sub>	1-hr	1.87	7.8
SO <sub>2</sub>	3-hr	1.06	25

The GLCmax are the maximum predicted concentrations associated with one year of meteorological data.

EPA intermittent guidance was relied on for the 1-hr  $SO_2$  De Minimis analysis. Refer to the Modeling Emissions Inventory section for details.

The justification for selecting EPA's interim 1-hr SO<sub>2</sub> De Minimis level was based on the assumptions underlying EPA's development of the 1-hr SO<sub>2</sub> De Minimis level. As explained in EPA guidance memoranda<sup>5</sup>, EPA believes it is reasonable as an interim approach to use a De Minimis level that represents 4% of the 1-hr SO<sub>2</sub> NAAQS.

<sup>&</sup>lt;sup>5</sup> www.epa.gov/sites/production/files/2015-07/documents/appwso2.pdf

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Source ID	1-hr GLCmax (µg/m <sup>3</sup> per	Annual GLCmax (µg/m <sup>3</sup>
	lb/hr)	per lb/hr)
SCT07100	0.16	0.004
SCT08100	0.16	0.004
SCT09100	0.16	0.004
SCT10100	0.16	0.004
SCT11100	0.16	0.004
SCT12100	0.17	0.004
SCT13100	0.17	0.004
SCT14100	0.17	0.004
SCT07075	0.20	0.005
SCT08075	0.20	0.005
SCT09075	0.20	0.005
SCT10075	0.20	0.005
SCT11075	0.20	0.005
SCT12075	0.20	0.005
SCT13075	0.20	0.005
SCT14075	0.20	0.005
SCT07050	0.23	0.006
SCT08050	0.23	0.006
SCT09050	0.23	0.006
SCT10050	0.23	0.006
SCT11050	0.23	0.006
SCT12050	0.23	0.006
SCT13050	0.23	0.006

Table 8. Generic Modeling Results

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Source ID	1-hr GLCmax (µg/m <sup>3</sup> per Ib/hr)	Annual GLCmax (µg/m <sup>3</sup> per lb/hr)
SCT14050	0.23	0.006
E_GEN3	19.21	0.24
E_GEN4	21.43	0.24
E_GEN5	20.09	0.23

# Table 9. Minor NSR Project (Increases Only) Modeling Results for Health Effects

Pollutant & CAS#	Averaging Time	GLCmax (µg/m <sup>3</sup> )	10% ESL (µg/m³)
formaldehyde 50-00-0	1-hr	0.73	1.5

# 3. Model Used and Modeling Techniques

AERMOD (Version 23132) was used in a refined screening mode.

The proposed project consists of eight natural gas-fired simple cycle combustion turbines. Three scenarios were evaluated for the eight proposed turbines. The first scenario represents normal operations with MSS operations occurring simultaneously, the second scenario represents testing operations with MSS operations occurring simultaneously, and the third scenario represents startup/shutdown operations with MSS operations occurring simultaneously. Within each scenario for short-term analyses, source groups were used to evaluate the various load operations and associated parameters of the eight new turbines and two existing turbines to determine the worst-case scenario as applicable. The source groups are as follows:

- N100100 represents the eight proposed turbines in normal operations at 100% load and the two existing turbines in normal operations at 100% load plus all other applicable sources.
- N100075 represents the eight proposed turbines in normal operations at 100% load and the two existing turbines in normal operations at 75% load plus all other applicable sources.
- N100045 represents the eight proposed turbines in normal operations at 100% load and the two existing turbines in normal operations at 45% load plus all other applicable sources.
- N075100 represents the eight proposed turbines in normal operations at 75% load and the two existing turbines in normal operations at 100% load plus all other applicable sources.
- N075075 represents the eight proposed turbines in normal operations at 75% load and the two existing turbines in normal operations at 75% load plus all other applicable sources.
- N075045 represents the eight proposed turbines in normal operations at 75% load and the two existing turbines in normal operations at 45% load plus all other applicable sources.
- N050100 represents the eight proposed turbines in normal operations at 50% load and the two existing turbines in normal operations at 100% load plus all other applicable sources.
- N050075 represents the eight proposed turbines in normal operations at 50% load and the two existing turbines in normal operations at 75% load plus all other applicable sources.

- N050045 represents the eight proposed turbines in normal operations at 50% load and the two existing turbines in normal operations at 45% load plus all other applicable sources.
- T100100 represents the eight proposed turbines in normal operations at 100% load, the two existing turbines in normal operations at 100% load, and the testing of all emergency engines plus all other applicable sources.
- T100075 represents the eight proposed turbines in normal operations at 100% load, the two existing turbines in normal operations at 75% load, and the testing of all emergency engines plus all other applicable sources.
- T100045 represents the eight proposed turbines in normal operations at 100% load, the two existing turbines in normal operations at 45% load, and the testing of all emergency engines plus all other applicable sources.
- T075100 represents the eight proposed turbines in normal operations at 75% load, the two existing turbines in normal operations at 100% load, and the testing of all emergency engines plus all other applicable sources.
- T075075 represents the eight proposed turbines in normal operations at 75% load, the two existing turbines in normal operations at 75% load, and the testing of all emergency engines plus all other applicable sources.
- T075045 represents the eight proposed turbines in normal operations at 75% load, the two existing turbines in normal operations at 45% load, and the testing of all emergency engines plus all other applicable sources.
- T050100 represents the eight proposed turbines in normal operations at 50% load, the two existing turbines in normal operations at 100% load, and the testing of all emergency engines plus all other applicable sources.
- T050075 represents the eight proposed turbines in normal operations at 50% load, the two existing turbines in normal operations at 75% load, and the testing of all emergency engines plus all other applicable sources.
- T050045 represents the eight proposed turbines in normal operations at 50% load, the two existing turbines in normal operations at 45% load, and the testing of all emergency engines plus all other applicable sources.
- SU100 represents the eight proposed turbines in startup/shutdown operations and the two existing turbines in normal operations at 100% load plus all other applicable sources.
- SU075 represents the eight proposed turbines in startup/shutdown operations and the two existing turbines in normal operations at 75% load plus all other applicable sources.
- SU045 represents the eight proposed turbines in startup/shutdown operations and the two existing turbines in normal operations at 45% load plus all other applicable sources.
- N100SU represents the eight proposed turbines in normal operations at 100% load and the two existing turbines in startup/shutdown operations plus all other applicable sources.
- N075SU represents the eight proposed turbines in normal operations at 75% load and the two existing turbines in startup/shutdown operations plus all other applicable sources.

- N050SU represents the eight proposed turbines in normal operations at 50% load and the two existing turbines in startup/shutdown operations plus all other applicable sources.
- SUSU represents the eight proposed turbines in startup/shutdown operations and the two existing turbines in startup/shutdown operations plus all other applicable sources.

For the annual analyses, the turbine exhaust parameters were based on the 100% load operations while the emissions included all operational loads. The results presented above represent the results from the worst-case scenario.

For the health effects analysis, a unitized emission rate of 1 lb/hr was used to predict a generic short-term and long-term impact for each source. For the turbines, the worst-case load operation (50% load) was used in the subsequent calculations. The generic impact was multiplied by the proposed pollutant specific emission rates to calculate a maximum predicted concentration for each source. The maximum predicted concentration for each source was summed to get a total predicted concentration for the pollutant. The total predicted concentration was compared to 10 percent of the ESL (step 3 of the MERA guidance). The pollutant fell out by step 3 of the MERA guidance.

The applicant conducted the 1-hr and annual NO<sub>2</sub> De minimis analyses using the plume volume molar ratio method (PVMRM) model option to account for conversion of NO<sub>x</sub> to NO<sub>2</sub>. For all project sources except the emergency engines, the default NO<sub>2</sub>/NO<sub>x</sub> in-stack ratio of 0.5 was used. For the emergency engines, in-stack ratios of 1 were used to account for the intermittent nature of these sources. An in-stack ratio of 1 effectively turns off the PVMRM algorithms and utilizes the AERMOD algorithms for the specified sources. For the 1-hr NO<sub>2</sub> NAAQS analysis, the default NO<sub>2</sub>/NO<sub>x</sub> in-stack ratio of 0.5 was used all non-intermittent sources at the site and all non-intermittent off-property sources within 3 km. For all non-intermittent off-property sources beyond 3 km, the default NO<sub>2</sub>/NO<sub>x</sub> in-stack ratio of 0.2 was used. For all intermittent sources at the site and intermittent off-property sources, in-stack ratios of 1 were used to account for the intermittent nature of these sources. In addition, the default NO<sub>x</sub> to NO<sub>2</sub> equilibrium ratio of 0.9 was used with the PVMRM model option.

The monitored ozone concentrations for the Tier 3 analysis were obtained from the EPA AIRS monitor 482210001 located at 200 N Gordon St., Granbury, Hood County. The use of this monitor with the PVMRM model option is reasonable based on the proximity of the monitor relative to the project site (approximately 12.5 km to the northwest of the project site). The seasonal-hourly ozone data were based on the highest daily 1-hr maximums per season for the years 2021-2023. The seasonal-hourly ozone data were pared in time with the modeled hours of meteorological data.

Since a company does not contribute to a condition of air pollution at receptors located within its own property, seven model runs and receptor group combinations were used in 1-hr NO<sub>2</sub> NAAQS analyses to determine source culpability. The first model run was based on the turbines in normal operations and included all significant receptors except for receptors located over Wolf Hollow I Power LLC (RN100219195), and all sources were modeled. The second model run included only the significant receptors located on Wolf Hollow I Power LLC property, and all sources were modeled except the sources located on Wolf Hollow I Power LLC property. The third model run was based on turbines in startup/shutdown operations and included all significant receptors except for receptors located over Wolf Hollow I Power LLC (RN100219195), Diversified Production LLC (RN106818222), EOG Resources Inc (RN105373104), and Blackbeard Operating LLC (RN106817422), and all sources were modeled. The fourth model run included only the significant receptors located on Wolf Hollow I Power LLC property, and all sources were modeled except the sources located on Wolf Hollow I Power LLC property. The fifth model run included only the significant receptors located on Diversified Production LLC property, and all sources were modeled except the sources located on Diversified Production LLC property. The sixth model run included only the significant receptors located on EOG Resources Inc property,

and all sources were modeled except the sources located on EOG Resources Inc property. The seventh model run included only the significant receptors located on Blackbeard Operating LLC property, and all sources were modeled except the sources located on Blackbeard Operating LLC property. The applicant reported the maximum predicted concentration from the seven model runs.

# A. Land Use

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

# B. Meteorological Data

Surface Station and ID: Mineral Wells, TX (Station #: 93985) Upper Air Station and ID: Fort Worth, TX (Station #: 3990) Meteorological Dataset: 2017-2021 for all PSD analyses; 2020 for all other analyses Profile Base Elevation: 296.3 meters

# C. Receptor Grid

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

The receptor design was based on the property fence line instead of the property boundary for all analyses. This is conservative for the non-PSD analyses.

# D. Building Wake Effects (Downwash)

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

# 4. Modeling Emissions Inventory

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

The modeled temperatures were inconsistent with the reported temperatures for off-property sources 468816, 575916, and FILE0073. These inconsistencies are unlikely to change the overall conclusions since these are off-property sources not near the GLCmax and the discrepancies are small.

The modeled velocities are inconsistent with the reported velocities for off-property sources 574886, FILE0106, and FILE0147. These inconsistencies are unlikely to change the overall conclusions since these are off-property sources not near the GLCmax and the discrepancies are small.

For the 1-hr SO<sub>2</sub> De Minimis and 1-hr NO<sub>2</sub> De Minimis and NAAQS analyses, emissions from the proposed emergency engines (Model IDs E\_GEN3 thru E\_GEN5) were modeled with an annual average emission rate, consistent with EPA guidance for evaluating intermittent emissions. Emissions from the proposed emergency engines were represented to occur for no more than 100 hours per year each.

For the 1-hr SO<sub>2</sub> state property line, 3-hr SO<sub>2</sub> De Minimis, 8-hr CO De Minimis, 24-hr PM<sub>10</sub> De Minimis, 24-hr PM<sub>2.5</sub> De Minimis, NAAQS, and Increment analyses, emissions from the proposed emergency engines (Model IDs E\_GEN3 thru E\_GEN5) were based on average emission rates.

The modeled emission rates were based on 30 minutes of operation in a 1-hr period, 3-hr period, 8-hr period, and 24-hr period, respectively.

For 8-hr CO De Minimis analysis, emissions from the proposed continuous emission monitoring system (CEMS) calibrations (Model ID MSS\_CEMS) were based on 8-hr emission rates. The modeled emission rates were based on one hour of operation in an 8-hr period.

For the 1-hr NO<sub>2</sub> NAAQS analysis, emissions from the existing emergency engine and fire water pump (Model IDs E\_GEN2 and E\_PUMP2) were modeled with an annual average emission rate, consistent with EPA guidance for evaluating intermittent emissions. Emissions from the emergency engines were represented to occur for no more than 100 hours per year each.

For the 24-hr PM<sub>2.5</sub> NAAQS and Increment analyses, emissions from the existing emergency engine and fire water pump (Model IDs E\_GEN2 and E\_PUMP2) were based on 24-hr emission rates. The modeled emission rates were based on one hour of operation per day.

For the 24-hr PM<sub>10</sub> De Minimis and 24-hr PM<sub>2.5</sub> De Minimis, NAAQS, and Increment analyses, emissions from the proposed MSS activities of online turbine washing and filter changing (Model IDs MSS\_WASH and MSS\_FILT) were based on 24-hr emission rates. The modeled emission rates for turbine washing were based on 30 minutes of operation per day, and the modeled emission rates for filter changing were based on 12 hours per day.

For the 24-hr PM<sub>2.5</sub> NAAQS and Increment analyses, emissions from the existing MSS activities of online turbine washing and filter changing (Model IDs MSSWASH4, MSSWASH5, and MSSFILT) were based on 24-hr emission rates. The modeled emission rates for turbine washing were based on 30 minutes of operation per day, and the modeled emission rates for filter changing were based on 12 hours per day.

According to the applicant, modeling associated with SUSD operations (Model IDs SCT07SU1 thru SCT14SU1 and SCT07SU8 thru SCT14SU8) were conducted using the exhaust parameters corresponding to those expected during the startup operations and those corresponding to 100% load operations. The parameters for modeling the 1-hour averaging period were calculated assuming 15 minutes at the exhaust corresponding to startup operations. The parameters for modeling to 100% load operations. The parameters for modeling the 1-hour averaging period were calculated assuming 15 minutes at the exhaust corresponding to 100% load operations. The parameters for modeling the 8-hour period were calculated assuming 15 minutes at the exhaust corresponding to 100% load operations and the remaining 7 hours, 45 minutes at the exhaust corresponding to 100% load operations.

According to the applicant, testing for the emergency engines will not be conducted during turbine startup/shutdown operations.

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

State of Texas County of Travis

# APR 1 5 2025

**TCEQ Interoffice Memorandum** 

- To: Jason La **Energy Section**
- Thru: Chad Dumas, Team Leader Air Dispersion Modeling Team (ADMT)
- From: Matthew Kovar ADMT

Date: July 23, 2024

#### Second Air Quality Analysis Audit - Wolf Hollow II Power, LLC (RN108779729) Subject:

# 1. Project Identification Information

Permit Application Number: 175173 New Source Review (NSR) Project Number: 369521 ADMT Project Number: 9320 County: Hood

Air Quality Analysis: Submitted by POWER Engineers, Inc., July 2024, on behalf of Wolf Hollow II Power, LLC.

This is the second modeling audit for this NSR project number, and the second audit is conducted due to the inclusion of additional fugitive sources in the modeling. This memo represents a complete summary and supersedes the previous audit memo dated May 30, 2024 (WebCenter Content ID 7097591).

### 2. Report Summary

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

#### **De Minimis Analysis** Α.

A De Minimis analysis was initially conducted to determine if a full impacts analysis would be required. The De Minimis analysis modeling results indicate that 1-hr NO<sub>2</sub> and 24-hr and annual PM2.5 (NAAQS [National Ambient Air Quality Standards] and Increment) exceed the respective de minimis concentrations and require a full impacts analysis. The De Minimis analysis modeling results for annual NO2, 1-hr and 8-hr CO and 24-hr and annual  $PM_{10}$  indicate that the project is below the respective de minimis concentrations and no further analysis is required.

The justification for selecting EPA's interim 1-hr NO<sub>2</sub> De Minimis level is based on the assumptions underlying EPA's development of the 1-hr NO<sub>2</sub> De Minimis level. As explained in EPA guidance memoranda<sup>1</sup>, EPA believes it is reasonable as an interim approach to use a De Minimis level that represents 4% of the 1-hr NO2 NAAQS.

<sup>1</sup> www.tceq.texas.gov/assets/public/permitting/air/memos/guidance\_1hr\_no2naaqs.pdf Texas Commission on Environmental Quality

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Given under my hand and the seal of office. Alternative Custodian of Records was Commission on Environmental Quality

I hereby certify this is a true and correct copy of a

Texas Commission on Environmental Quality (TCEQ) document, which is filed in the Records of the Commission. The PM<sub>2.5</sub> and ozone De Minimis levels are EPA recommended De Minimis levels. The use of EPA recommended De Minimis levels is sufficient to conclude that a proposed source will not cause or contribute to a violation of an ozone and PM<sub>2.5</sub> NAAQS or PM<sub>2.5</sub> Prevention of Significant Deterioration (PSD) increments based on the analyses documented in EPA guidance and policy memoranda<sup>2</sup>.

While the De Minimis levels for both the NAAQS and increment are identical for  $PM_{2.5}$  in the table below, the procedures to determine significance (that is, predicted concentrations to compare to the De Minimis levels) are different. This difference occurs because the NAAQS for  $PM_{2.5}$  are statistically-based, but the corresponding increments are exceedance-based.

Pollutant	Averaging Time	GLCmax <sup>3</sup> (µg/m <sup>3</sup> )	De Minimis (μg/m³)
PM <sub>10</sub>	24-hr	1.83	5
PM <sub>10</sub>	Annual	0.36	1
PM <sub>2.5</sub> (NAAQS)	24-hr	1.35	1.2
PM <sub>2.5</sub> (NAAQS)	Annual	0.34	0.13
PM <sub>2.5</sub> (Increment)	24-hr	1.83	1.2
PM <sub>2.5</sub> (Increment)	Annual	0.36	0.13
NO <sub>2</sub>	1-hr	35	7.5
NO <sub>2</sub>	Annual	0.58	1
СО	1-hr	181	2000
СО	8-hr	19	500

# Table 1. Modeling Results for PSD De Minimis Analysis in Micrograms Per Cubic Meter (μg/m<sup>3</sup>)

The 24-hr and annual  $PM_{2.5}$  (NAAQS) and 1-hr NO<sub>2</sub> GLCmax are based on the highest five-year averages of the maximum predicted concentrations determined for each receptor. The GLCmax for all other pollutants and averaging times represent the maximum predicted concentrations over five years of meteorological data.

EPA intermittent guidance was relied on for the 1-hr NO<sub>2</sub> PSD De Minimis and NAAQS analyses. Refer to the Modeling Emissions Inventory section for details.

<sup>&</sup>lt;sup>2</sup> www.tceq.texas.gov/permitting/air/modeling/epa-mod-guidance.html

<sup>&</sup>lt;sup>3</sup> Ground level maximum concentration

To evaluate secondary  $PM_{2.5}$  impacts, the applicant provided an analysis based on a Tier 1 demonstration approach consistent with EPA's Guideline on Air Quality Models (GAQM). Specifically, the applicant used a Tier 1 demonstration tool developed by EPA referred to as Modeled Emission Rates for Precursors (MERPs). The basic idea behind the MERPs is to use technically credible air quality modeling to relate precursor emissions and peak secondary pollutants impacts from a source. Using data associated with the 500 tpy Parker County source, the applicant estimated 24-hr and annual secondary  $PM_{2.5}$  concentrations of 0.25 µg/m<sup>3</sup> and 0.005 µg/m<sup>3</sup>, respectively. Since the combined direct and secondary 24-hr and annual  $PM_{2.5}$  impacts are above the De minimis levels, a full impacts analysis is required.

 Table 2. Modeling Results for Ozone PSD De Minimis Analysis

 in Parts per Billion (ppb)

Pollutant	Averaging Time	GLCmax (ppb)	De Minimis (ppb)
O <sub>3</sub>	8-hr	0.989	1

The applicant performed an  $O_3$  analysis as part of the PSD AQA. The applicant evaluated project emissions of  $O_3$  precursor emissions (NO<sub>X</sub> and VOC). For the project NO<sub>X</sub> and VOC emissions, the applicant provided an analysis based on a Tier 1 demonstration approach consistent with EPA's GAQM. Specifically, the applicant used a Tier 1 demonstration tool developed by the EPA referred to as MERPs. Using data associated with the 500 tpy Parker County source, the applicant estimated an 8-hr  $O_3$  concentration of 0.989 ppb. When the estimates of ozone concentrations from the project emissions are added together, the results are less than the De Minimis level.

# B. Air Quality Monitoring

The De Minimis analysis modeling results indicate that 24-hr  $PM_{10}$ , annual  $NO_2$ , and 8-hr CO are below their respective monitoring significance level.

Pollutant	Averaging Time	GLCmax (µg/m³)	Significance (µg/m³)
PM <sub>10</sub>	24-hr	1.83	10
NO <sub>2</sub>	Annual	0.58	14
CO	8-hr	19	575

Table 3. Modeling Results for PSD Monitoring Significance Levels

The GLCmax represent the maximum predicted concentrations over five years of meteorological data.

The applicant evaluated ambient PM<sub>2.5</sub> monitoring data to satisfy the requirements for the pre-application air quality analysis.

Background concentrations for PM<sub>2.5</sub> were obtained from the EPA AIRS monitor 481390016 located at 2725 Old Fort Worth Rd., Midlothian, Ellis County. The three-year average (2019-2021) of the 98th percentile of the annual distribution of the 24-hr concentrations was used for the 24-hr value (17.51 ug/m<sup>3</sup>). The three-year average (2019-2021) of the annual concentrations was used for the annual value (7.78 ug/m<sup>3</sup>). The use of this monitor is reasonable based on a comparison of county-wide emissions, population, and a quantitative review of emissions sources in the surrounding area of the monitor site relative to the project site. Please note that the selected monitor was discontinued April 2022. Although the data relied on is older, the applicant noted that data from this representative monitoring station located within the same airshed offers background concentrations estimates that are more representative to the site location than selecting alternative data from a monitor outside the airshed or state. These background concentrations were also used as part of the NAAQS analysis.

Since the project has a net emissions increase of 100 tpy or more of VOC or  $NO_X$ , the applicant evaluated ambient  $O_3$  monitoring data to satisfy the requirements for the pre-application air quality analysis.

Background concentrations for ozone were obtained from EPA AIRS monitor 482210001 located at 200 N Gordon St., Granbury, Hood County. The applicant used the three-year average (2021-2023) of the annual fourth highest daily maximum 8-hr concentrations in the analysis (76 ppb). This monitor is reasonable based on the applicant's quantitative review of emissions sources in the surrounding area of the monitor site relative to the project site and proximity of the monitor to the project site (approximately 12.5 kilometers (km) northwest). The proposed project is located in an attainment area for ozone and is required to obtain a PSD permit<sup>4</sup>. The PSD permitting program requires that proposed new major stationary sources and major modifications must demonstrate that the emissions from the proposed source or modification will not cause or contribute to a violation of any NAAQS<sup>5</sup>. The predicted concentrations in Table 2 demonstrate the proposed project would not cause or contribute to a violation of the NAAQS.

# C. National Ambient Air Quality Standard (NAAQS) Analysis

The De Minimis analysis modeling results indicate that 24-hr and annual  $PM_{2.5}$  and 1-hr  $NO_2$  exceed the respective de minimis concentration and require a full impacts analysis. The full NAAQS modeling results indicate the total predicted concentrations will not result in an exceedance of the NAAQS.

Pollutant	Averaging Time	GLCmax (µg/m³)	Background (μg/m³)	Total Conc. = [Background + GLCmax] (µg/m <sup>3</sup> )	Standard (µg/m³)
PM <sub>2.5</sub>	24-hr	4.03	17.51	21.54	35

Table 4. Total Concentrations for PSD NAAQS (Concentrations > De Minimis)

<sup>4</sup> October 26, 2015 *Federal Register* (80 FR 65292)

Texas Commission on Environmental Quality

<sup>&</sup>lt;sup>5</sup> 40 Code of Federal Regulations (CFR) 52.21(k)

# **TCEQ Interoffice Memorandum**

Pollutant	Averaging Time	GLCmax (µg/m³)	Background (µg/m³)	Total Conc. = [Background + GLCmax] (µg/m <sup>3</sup> )	Standard (µg/m³)
PM <sub>2.5</sub>	Annual	0.66	7.78	8.44	9
NO <sub>2</sub>	1-hr	164.33	See background discussion below	164.33	188

The 24-hr  $PM_{2.5}$  GLCmax is the highest five-year average of the 98th percentile of the annual distribution of predicted 24-hr concentrations determined for each receptor. The annual  $PM_{2.5}$  GLCmax is the maximum five-year average of the annual concentrations determined for each receptor. The 1-hr  $NO_2$  GLCmax is the highest five-year average of the 98th percentile of the annual distribution of predicted daily maximum 1-hr concentrations determined for each receptor.

Background concentrations for NO<sub>2</sub> were obtained from the EPA AIRS monitor 483491051 at Corsicana Airport, Corsicana, Navarro County. For the 1-hr NO<sub>2</sub> NAAQS analysis, the applicant conducted the evaluation by combining NO<sub>2</sub> background concentrations with the predicted concentrations on a seasonal-hour of day basis for each modeled receptor. The applicant followed EPA guidance when developing seasonal-hour of day background concentrations. The seasonalhour of day background concentrations were based on the three-year average (2020-2022) of the 98th percentile of the annual distribution of the maximum daily 1-hr concentrations for each season and hour of day. These background values were then used in the model (as background scalars) to be combined with model predictions giving a total predicted concentration. Monitoring data for 2023 are available but less than 50% complete for the second guarter and could not be validated since it does not meet the EPA's requirement for completeness to use the substitution test; however, ADMT reviewed the available monitoring data and verified that the background concentrations used are comparable to the recent data and relying on complete data is reasonable. The use of this monitor is reasonable based on a comparison of county-wide emissions, population, and a quantitative review of emissions sources in the surrounding area of the monitor site relative to the project site.

As stated above, to evaluate secondary  $PM_{2.5}$  impacts, the applicant provided an analysis based on a Tier 1 demonstration approach consistent with EPA's GAQM. Specifically, the applicant used a Tier 1 demonstration tool developed by EPA referred to as MERPs. Using data associated with the 500 tpy Parker County source, the applicant estimated 24-hr and annual secondary  $PM_{2.5}$  concentrations of 0.25 µg/m<sup>3</sup> and 0.005 µg/m<sup>3</sup>, respectively. When these estimates are added to the GLCmax listed in Table 4 above, the results are less than the NAAQS.

# D. Increment Analysis

The De Minimis analysis modeling results indicate that 24-hr and annual  $PM_{2.5}$  exceed the respective de minimis concentrations and require a PSD increment analysis.

Pollutant	Averaging Time	GLCmax (µg/m³)	Increment (µg/m³)
PM <sub>2.5</sub>	24-hr	6.63	9
PM <sub>2.5</sub>	Annual	0.71	4

Table 5. Results for PSD Increment Analysis

The GLCmax for 24-hr  $PM_{2.5}$  is the maximum high, second high (H2H) predicted concentration across five years of meteorological data. For annual  $PM_{2.5}$ , the GLCmax represents the maximum predicted concentration over five years of meteorological data.

The GLCmax for 24-hr and annual  $PM_{2.5}$  reported in the table above represent the total predicted concentrations associated with modeling the direct  $PM_{2.5}$  emissions and the contributions associated with secondary  $PM_{2.5}$  formation (discussed above in the NAAQS Analysis section).

# E. Additional Impacts Analysis

The applicant performed an Additional Impacts Analysis as part of the PSD AQA. The applicant conducted a growth analysis and determined that population will not significantly increase as a result of the proposed project. The applicant conducted a soils and vegetation analysis and determined that all evaluated criteria pollutant concentrations are below their respective secondary NAAQS. The applicant meets the Class II visibility analysis requirement by complying with the opacity requirements of 30 Texas Administrative Code Chapter 111. The Additional Impacts Analyses are reasonable and possible adverse impacts from this project are not expected.

The ADMT evaluated predicted concentrations from the proposed project to determine if emissions could adversely affect a Class I area. The nearest Class I area, Wichita Mountains Wildlife Refuge, is located approximately 277 km from the proposed site.

The H<sub>2</sub>SO<sub>4</sub> 24-hr maximum predicted concentration of 0.04  $\mu$ g/m<sup>3</sup> occurred within the noncontiguous property to the north of Mitchel Bend Highway (approximately 365 meters to the north of the project boundary). The H<sub>2</sub>SO<sub>4</sub> 24-hr maximum predicted concentration occurring at the edge of the receptor grid, 30 km from the proposed sources, in the direction of the Wichita Mountains Wildlife Refuge Class I area is 0.004  $\mu$ g/m<sup>3</sup>. The Wichita Mountains Wildlife Refuge Class I area is an additional 247 km from the edge of the receptor grid. Therefore, emissions of H<sub>2</sub>SO<sub>4</sub> from the proposed project are not expected to adversely affect the Wichita Mountains Wildlife Refuge Class I area.

The predicted concentrations of 24-hr and annual  $PM_{10}$ , 24-hr and annual  $PM_{2.5}$ , annual  $NO_2$ , and 1-hr and 3-hr  $SO_2$  are all less than de minimis levels at a distance of one km from the proposed sources in the direction the Wichita Mountains

Wildlife Refuge Class I area. The predicted concentrations of 1-hr NO<sub>2</sub> are greater than de minimis levels at a distance of 50 km from the proposed sources to the west of the project site; however, this will not adversely affect the Class I area since the concentrations decrease with distance, and the Class I area is an additional 227 km to the north. In addition, the NO<sub>2</sub> 1-hr maximum predicted concentration occurring at the edge of the receptor grid, 50 km from the proposed sources, in the direction of the Wichita Mountains Wildlife Refuge Class I area is  $3.39 \ \mu g/m^3$ , which is de minimis. As noted, the Wichita Mountains Wildlife Refuge Class I area is an additional 227 km from the edge of the receptor grid. Therefore, emissions from the proposed project are not expected to adversely affect the Wichita Mountains Wildlife Refuge Class I area.

# F. Minor Source NSR and Air Toxics Analysis

Pollutant	Ilutant Averaging Time GLCmax (µg/m <sup>3</sup> )		De Minimis (µg/m³)
SO <sub>2</sub>	1-hr	1.87	20.42
H <sub>2</sub> SO <sub>4</sub>	1-hr	0.23	1
H <sub>2</sub> SO <sub>4</sub>	24-hr	0.04	0.3

# Table 6. Project-Related Modeling Results for State Property Line

Table 7. Modeling Results for Minor NSR De Minimis					
Pollutant Averaging Time		GLCmax (µg/m³)	De Minimis (µg/m³)		
SO <sub>2</sub>	1-hr	1.87	7.8		

Desults for Minor NCD

1.06

The GLCmax are the maximum predicted concentrations associated with one year of meteorological data.

EPA intermittent guidance was relied on for the 1-hr SO<sub>2</sub> De Minimis analysis. Refer to the Modeling Emissions Inventory section for details.

The justification for selecting EPA's interim 1-hr SO<sub>2</sub> De Minimis level was based on the assumptions underlying EPA's development of the 1-hr SO<sub>2</sub> De Minimis level. As explained in EPA guidance memoranda<sup>6</sup>, EPA believes it is reasonable as an interim approach to use a De Minimis level that represents 4% of the 1-hr SO<sub>2</sub> NAAQS.

3-hr

SO<sub>2</sub>

25

<sup>&</sup>lt;sup>6</sup> www.epa.gov/sites/production/files/2015-07/documents/appwso2.pdf

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Source ID	1-hr GLCmax (µg/m³ per lb/hr)	Annual GLCmax (µg/m <sup>3</sup> per lb/hr)
SCT07100	0.16	0.004
SCT08100	0.16	0.004
SCT09100	0.16	0.004
SCT10100	0.16	0.004
SCT11100	0.16	0.004
SCT12100	0.17	0.004
SCT13100	0.17	0.004
SCT14100	0.17	0.004
SCT07075	0.20	0.005
SCT08075	0.20	0.005
SCT09075	0.20	0.005
SCT10075	0.20	0.005
SCT11075	0.20	0.005
SCT12075	0.20	0.005
SCT13075	0.20	0.005
SCT14075	0.20	0.005
SCT07050	0.23	0.006
SCT08050	0.23	0.006
SCT09050	0.23	0.006
SCT10050	0.23	0.006
SCT11050	0.23	0.006
SCT12050	0.23	0.006
SCT13050	0.23	0.006

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Source ID	1-hr GLCmax (µg/m³ per lb/hr)	Annual GLCmax (µg/m <sup>3</sup> per lb/hr)
SCT14050	0.23	0.006
E_GEN3	19.21	0.24
E_GEN4	21.43	0.24
E_GEN5	20.09	0.23
E_NGFUG3	2667	20.14
MSS_FVNT	5336.84	37.11

 Table 9. Minor NSR Project (Increases Only) Modeling Results for Health

 Effects

Pollutant & CAS# <sup>7</sup>	Averaging Time	GLCmax (µg/m³)	10% ESL <sup>8</sup> (μg/m³)
formaldehyde 50-00-0	1-hr	0.73	1.5
n-hexane 110-54-3	1-hr	0.23	560
n-hexane 110-54-3	Annual	<0.01	20

# Table 10. Minor NSR Site-Wide Modeling Results for Health Effects

Pollutant	CAS#	Averaging Time	GLCmax (µg/m <sup>3</sup> )	GLCmax Location	ESL (µg/m³)
fuel oil No. 2	68476-30-2	1-hr	557	W Property Line	1000

The GLCmax location is listed in Table 10 above.

<sup>8</sup> Effects Screening Level

<sup>&</sup>lt;sup>7</sup> Chemical Abstract Service Number

# 3. Model Used and Modeling Techniques

AERMOD (Version 23132) was used in a refined screening mode.

The proposed project consists of eight natural gas-fired simple cycle combustion turbines. Three scenarios were evaluated for the eight proposed turbines. The first scenario represents normal operations with Maintenance, Startup, and Shutdown (MSS) operations occurring simultaneously, the second scenario represents testing operations with MSS operations occurring simultaneously, and the third scenario represents startup/shutdown operations with MSS operations occurring simultaneously. Within each scenario for short-term analyses, source groups were used to evaluate the various load operations and associated parameters of the eight new turbines and two existing turbines to determine the worst- case scenario as applicable. The source groups are as follows:

- N100100 represents the eight proposed turbines in normal operations at 100% load and the two existing turbines in normal operations at 100% load plus all other applicable sources.
- N100075 represents the eight proposed turbines in normal operations at 100% load and the two existing turbines in normal operations at 75% load plus all other applicable sources.
- N100045 represents the eight proposed turbines in normal operations at 100% load and the two existing turbines in normal operations at 45% load plus all other applicable sources.
- N075100 represents the eight proposed turbines in normal operations at 75% load and the two existing turbines in normal operations at 100% load plus all other applicable sources.
- N075075 represents the eight proposed turbines in normal operations at 75% load and the two existing turbines in normal operations at 75% load plus all other applicable sources.
- N075045 represents the eight proposed turbines in normal operations at 75% load and the two existing turbines in normal operations at 45% load plus all other applicable sources.
- N050100 represents the eight proposed turbines in normal operations at 50% load and the two existing turbines in normal operations at 100% load plus all other applicable sources.
- N050075 represents the eight proposed turbines in normal operations at 50% load and the two existing turbines in normal operations at 75% load plus all other applicable sources.
- N050045 represents the eight proposed turbines in normal operations at 50% load and the two existing turbines in normal operations at 45% load plus all other applicable sources.

- T100100 represents the eight proposed turbines in normal operations at 100% load, the two existing turbines in normal operations at 100% load, and the testing of all emergency engines plus all other applicable sources.
- T100075 represents the eight proposed turbines in normal operations at 100% load, the two existing turbines in normal operations at 75% load, and the testing of all emergency engines plus all other applicable sources.
- T100045 represents the eight proposed turbines in normal operations at 100% load, the two existing turbines in normal operations at 45% load, and the testing of all emergency engines plus all other applicable sources.
- T075100 represents the eight proposed turbines in normal operations at 75% load, the two existing turbines in normal operations at 100% load, and the testing of all emergency engines plus all other applicable sources.
- T075075 represents the eight proposed turbines in normal operations at 75% load, the two existing turbines in normal operations at 75% load, and the testing of all emergency engines plus all other applicable sources.
- T075045 represents the eight proposed turbines in normal operations at 75% load, the two existing turbines in normal operations at 45% load, and the testing of all emergency engines plus all other applicable sources.
- T050100 represents the eight proposed turbines in normal operations at 50% load, the two existing turbines in normal operations at 100% load, and the testing of all emergency engines plus all other applicable sources.
- T050075 represents the eight proposed turbines in normal operations at 50% load, the two existing turbines in normal operations at 75% load, and the testing of all emergency engines plus all other applicable sources.
- T050045 represents the eight proposed turbines in normal operations at 50% load, the two existing turbines in normal operations at 45% load, and the testing of all emergency engines plus all other applicable sources.
- SU100 represents the eight proposed turbines in startup/shutdown operations and the two existing turbines in normal operations at 100% load plus all other applicable sources.
- SU075 represents the eight proposed turbines in startup/shutdown operations and the two existing turbines in normal operations at 75% load plus all other applicable sources.
- SU045 represents the eight proposed turbines in startup/shutdown operations and the two existing turbines in normal operations at 45% load plus all other applicable sources.
- N100SU represents the eight proposed turbines in normal operations at 100% load and the two existing turbines in startup/shutdown operations plus all other applicable sources.

- N075SU represents the eight proposed turbines in normal operations at 75% load and the two existing turbines in startup/shutdown operations plus all other applicable sources.
- N050SU represents the eight proposed turbines in normal operations at 50% load and the two existing turbines in startup/shutdown operations plus all other applicable sources.
- SUSU represents the eight proposed turbines in startup/shutdown operations and the two existing turbines in startup/shutdown operations plus all other applicable sources.

For the annual analyses, the turbine exhaust parameters were based on the 100% load operations while the emissions included all operational loads. The results presented above represent the results from the worst-case scenario.

For the health effects analysis, a unitized emission rate of 1 lb/hr was used to predict a generic short-term and long-term impact for each source. For the turbines, the worst-case load operation (50% load) was used in the subsequent calculations. The generic impact was multiplied by the proposed pollutant specific emission rates to calculate a maximum predicted concentration for each source. The maximum predicted concentration for each source was summed to get a total predicted concentration for each pollutant. The total predicted concentration was compared to 10 percent of the ESL (step 3 of the Modeling and Effects Review Applicability [MERA] guidance).

The applicant conducted the 1-hr and annual NO<sub>2</sub> De minimis analyses using the plume volume molar ratio method (PVMRM) model option to account for conversion of NO<sub>X</sub> to NO<sub>2</sub>. For all project sources except the emergency engines, the default NO<sub>2</sub>/NO<sub>X</sub> in-stack ratio of 0.5 was used. For the emergency engines, in-stack ratios of 1 were used to account for the intermittent nature of these sources. An in-stack ratio of 1 effectively turns off the PVMRM algorithms and utilizes the AERMOD algorithms for the specified sources. For the 1-hr NO<sub>2</sub> NAAQS analysis, the default NO<sub>2</sub>/NO<sub>X</sub> instack ratio of 0.5 was used all non-intermittent sources at the site and all non-intermittent off-property sources within 3 km. For all non-intermittent off-property sources at the site and intermittent off-property sources, in-stack ratios of 0.2 was used. For all intermittent sources at the site and intermittent off-property sources. In addition, the default NO<sub>X</sub> to NO<sub>2</sub> equilibrium ratio of 0.9 was used with the PVMRM model option.

The monitored ozone concentrations for the Tier 3 analysis were obtained from the EPA AIRS monitor 482210001 located at 200 N Gordon St., Granbury, Hood County. The use of this monitor with the PVMRM model option is reasonable based on the proximity of the monitor relative to the project site (approximately 12.5 km to the northwest of the project site). The seasonal-hourly ozone data were based on the highest daily 1-hr maximums per season for the years 2021-2023. The seasonal-hourly ozone data were pared in time with the modeled hours of meteorological data.

Since a company does not contribute to a condition of air pollution at receptors located within its own property, seven model runs and receptor group combinations were used in 1-hr NO<sub>2</sub> NAAQS analyses to determine source culpability. The first

model run was based on the turbines in normal operations and included all significant receptors except for receptors located over Wolf Hollow I Power LLC (RN100219195), and all sources were modeled. The second model run included only the significant receptors located on Wolf Hollow I Power LLC property, and all sources were modeled except the sources located on Wolf Hollow I Power LLC property. The third model run was based on turbines in startup/shutdown operations and included all significant receptors except for receptors located over Wolf Hollow I Power LLC (RN100219195). Diversified Production LLC (RN106818222), EOG Resources Inc (RN105373104), and Blackbeard Operating LLC (RN106817422), and all sources were modeled. The fourth model run included only the significant receptors located on Wolf Hollow I Power LLC property, and all sources were modeled except the sources located on Wolf Hollow I Power LLC property. The fifth model run included only the significant receptors located on Diversified Production LLC property, and all sources were modeled except the sources located on Diversified Production LLC property. The sixth model run included only the significant receptors located on EOG Resources Inc property, and all sources were modeled except the sources located on EOG Resources Inc property. The seventh model run included only the significant receptors located on Blackbeard Operating LLC property, and all sources were modeled except the sources located on Blackbeard Operating LLC property. The applicant reported the maximum predicted concentration from the seven model runs.

# A. Land Use

Low roughness and elevated terrain were used in the modeling analysis. These selections are consistent with the AERSURFACE analysis, topographic map, digital elevation models, and aerial photography. The selection of low roughness is reasonable.

# B. Meteorological Data

Surface Station and ID: Mineral Wells, TX (Station #: 93985) Upper Air Station and ID: Fort Worth, TX (Station #: 3990) Meteorological Dataset: 2017-2021 for all PSD analyses; 2020 for all other analyses Profile Base Elevation: 296.3 meters

# C. Receptor Grid

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

The receptor design was based on the property fence line instead of the property boundary for all analyses. This is conservative for the non-PSD analyses.

# D. Building Wake Effects (Downwash)

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

# 4. Modeling Emissions Inventory

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

The modeled temperatures were inconsistent with the reported temperatures for offproperty sources 468816, 575916, and FILE0073. These inconsistencies are unlikely to change the overall conclusions since these are off-property sources not near the GLCmax and the discrepancies are small.

The modeled velocities are inconsistent with the reported velocities for off-property sources 574886, FILE0106, and FILE0147. These inconsistencies are unlikely to change the overall conclusions since these are off-property sources not near the GLCmax and the discrepancies are small.

For the 1-hr SO<sub>2</sub> De Minimis and 1-hr NO<sub>2</sub> De Minimis and NAAQS analyses, emissions from the proposed emergency engines (Model IDs E\_GEN3 thru E\_GEN5) were modeled with an annual average emission rate, consistent with EPA guidance for evaluating intermittent emissions. Emissions from the proposed emergency engines were represented to occur for no more than 100 hours per year each.

For the 1-hr SO<sub>2</sub> state property line, 3-hr SO<sub>2</sub> De Minimis, 8-hr CO De Minimis, 24-hr PM<sub>10</sub> De Minimis, 24-hr PM<sub>2.5</sub> De Minimis, NAAQS, and Increment analyses, emissions from the proposed emergency engines (Model IDs E\_GEN3 thru E\_GEN5) were based on average emission rates. The modeled emission rates were based on 30 minutes of operation in a 1-hr period, 3-hr period, 8-hr period, and 24-hr period, respectively.

For 8-hr CO De Minimis analysis, emissions from the proposed continuous emission monitoring system (CEMS) calibrations (Model ID MSS\_CEMS) were based on 8-hr emission rates. The modeled emission rates were based on one hour of operation in an 8-hr period.

For the 1-hr NO<sub>2</sub> NAAQS analysis, emissions from the existing emergency engine and fire water pump (Model IDs E\_GEN2 and E\_PUMP2) were modeled with an annual average emission rate, consistent with EPA guidance for evaluating intermittent emissions. Emissions from the emergency engines were represented to occur for no more than 100 hours per year each.

For the 24-hr PM<sub>2.5</sub> NAAQS and Increment analyses, emissions from the existing emergency engine and fire water pump (Model IDs E\_GEN2 and E\_PUMP2) were based on 24-hr emission rates. The modeled emission rates were based on one hour of operation per day.

For the 24-hr  $PM_{10}$  De Minimis and 24-hr  $PM_{2.5}$  De Minimis, NAAQS, and Increment analyses, emissions from the proposed MSS activities of online turbine washing and filter changing (Model IDs MSS\_WASH and MSS\_FILT) were based on 24-hr emission rates. The modeled emission rates for turbine washing were based on 30 minutes of operation per day, and the modeled emission rates for filter changing were based on 12 hours per day.

For the 24-hr PM<sub>2.5</sub> NAAQS and Increment analyses, emissions from the existing MSS activities of online turbine washing and filter changing (Model IDs MSSWASH4,

MSSWASH5, and MSSFILT) were based on 24-hr emission rates. The modeled emission rates for turbine washing were based on 30 minutes of operation per day, and the modeled emission rates for filter changing were based on 12 hours per day.

According to the applicant, modeling associated with SUSD operations (Model IDs SCT07SU1 thru SCT14SU1 and SCT07SU8 thru SCT14SU8) were conducted using the exhaust parameters corresponding to those expected during the startup operations and those corresponding to 100% load operations. The parameters for modeling the 1-hour averaging period were calculated assuming 15 minutes at the exhaust corresponding to 100% load operations at the exhaust corresponding to 100% load operations. The parameters for modeling to 100% load operations at the exhaust corresponding to 100% load operations. The parameters for modeling the 8-hour period were calculated assuming 15 minutes at the exhaust corresponding to 100% load operations. The parameters for modeling the 8-hour period were calculated assuming 15 minutes at the exhaust corresponding to 100% load operations. The parameters for modeling the 8-hour period were calculated assuming 15 minutes at the exhaust corresponding to 100% load operations.

According to the applicant, testing for the emergency engines will not be conducted during turbine startup/shutdown operations.

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



# **Compliance History Report**

Compliance History Report for CN604679639, RN108779729, Rating Year 2024 which includes Compliance History (CH) components from September 1, 2019, through August 31, 2024.

Customer, Respondent, or Owner/Operator:	CN604679639, Wolf Hollow II Po LLC	ower, Classification: HIGH	<b>Rating:</b> 0.00
Regulated Entity:	RN108779729, WOLF HOLLOW I	I Classification: HIGH	<b>Rating:</b> 0.00
<b>Complexity Points:</b>	18	Repeat Violator: NO	
CH Group:	06 - Electric Power Generation		
Location:	8787 WOLF HOLLOW CT GRANB	SURY, TX 76048-7736, HOOD COUNTY	
TCEQ Region:	REGION 04 - DFW METROPLEX		3
ID Number(s):		1	
AIR OPERATING PERMITS	PERMIT 3848	PUBLIC WATER SYSTEM/SUPPLY	REGISTRATION
	C AES NUM 4922100721	1110130	
ATR NEW SOURCE PERMIT	S AFS NUM 4822100731	ATE NEW SOURCE PERMITS EPA P	
ATR NEW SOURCE PERMIT	S DERMIT 175173	ATE NEW SOURCE PERMITS EPA P	
WASTEWATER PERMIT WOO	3 PERMIT 175175	WASTEWATED EDA ID TY0130760	ERMIT GHGF3DTA238
AIR EMISSIONS INVENTO		INDUSTRIAL AND HAZARDOUS W	ASTE OTS REQUEST
HQA037L	ACCOUNT NONDER	41571	
TAX RELIEF ID NUMBER 20	889	TAX RELIEF ID NUMBER 20887	
TAX RELIEF ID NUMBER 208	878	TAX RELIEF ID NUMBER 23769	
TAX RELIEF ID NUMBER 203	879	TAX RELIEF ID NUMBER 20880	
TAX RELIEF ID NUMBER 208	885	TAX RELIEF ID NUMBER 20890	19
<b>Compliance History Per</b>	iod: September 01, 2019 to Aug	ust 31, 2024 Rating Year: 2024	Rating Date: 09/01/2024
Date Compliance Histor	y Report Prepared: January	03, 2025	
Agency Decision Requir	ing Compliance History:	nforcement	n.
<b>Component Period Sele</b>	cted: September 01, 2019 to A	ugust 31, 2024	
TCEQ Staff Member to C	Contact for Additional Inform	nation Regarding This Compliand	e History.
Name: TCEO Staff Me	mber	<b>Phone:</b> (512) 239-	1000
Site and Owner/Oper	rator History:		
1) Has the site been in evicto	nee and (an anamation for the full fi		VEC
2) Has there been in existe	change in experation for the full in	be site during the compliance period?	TES NO
2) has there been a (known)	change in ownership/operator of th	he site during the compliance period?	NO
Components (Multim	edia) for the Site Are List	ted in Sections A - J	
A Final Ordana count i	udements and concept doo		
N/A	augments, and consent dec		
B. Criminal convictions N/A	5:		
C. Chronic excessive e	missions events:	State of Texas County of Travis	APR 1 5 2025
N/A		l hereby certify Texas Commissi	this is a true and correct copy of a on Environmental Quality (TCEQ)
D. The approval dates	of investigations (CCEDS In	v. Track. No.): document, whic	h is filed in the Records of the Commission.
Item 1 Novembe	r 25, 2019 (1610214)	Given under my	hand and the seal of office.
Item 2 Novembe	r 26, 2019 (1597755)	Page 1	HF)
		Page 1	ernative Custodian of Records

Alternative Eustodian of Records Texas Commission on Environmental Quality

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Item 3	December 30, 2019	(1605150)
Item 4	June 23, 2020	(1645582)
Item 5	July 20, 2021	(1738532)
Item 6	September 24, 2021	(1768921)
Item 7	October 11, 2021	(1780090)
Item 8	November 22, 2021	(1786146)
Item 9	December 13, 2021	(1793137)
Item 10	January 18, 2022	(1800956)
Item 11	February 15, 2022	(1808782)
Item 12	February 22, 2022	(1761811)
Item 13	March 15, 2022	(1815887)
Item 14	April 21, 2022	(1822469)
Item 15	April 27, 2022	(1772543)
Item 16	May 14, 2022	(1831318)
Item 17	June 20, 2022	(1837607)
Item 18	June 28, 2022	(1844766)
Item 19	August 12, 2022	(1851299)
Item 20	September 09, 2022	(1858719)
Item 21	October 07, 2022	(1865061)
Item 22	November 18, 2022	(1871948)
Item 23	December 22, 2022	(1877828)
Item 24	January 05, 2023	(1862108)
Item 25	February 14, 2023	(1892431)
Item 26	March 20, 2023	(1901028)
Item 27	April 13, 2023	(1907823)
Item 28	May 02, 2023	(1914958)
Item 29	June 05, 2023	(1921590)
Item 30	July 21, 2023	(1928567)
Item 31	August 18, 2023	(1935484)
Item 32	September 11, 2023	(1941730)
Item 33	October 20, 2023	(1948487)
Item 34	November 09, 2023	(1932317)
Item 35	November 13, 2023	(1954158)
Item 36	December 18, 2023	(1963966)
Item 37	February 19, 2024	(1979611)
Item 38	March 19, 2024	(1986171)
Item 39	April 19, 2024	(1992723)
Item 40	May 13, 2024	(1999155)
Item 41	June 19, 2024	(2006120)
Item 42	August 22, 2024	(2019491)

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

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

## F. Environmental audits:

N/A

- G. Type of environmental management systems (EMSs): \$N/A\$
- H. Voluntary on-site compliance assessment dates:  $$N\!/\!A$$
- I. Participation in a voluntary pollution reduction program: \$N/A\$

## J. Early compliance:

Compliance History Report for CN604679639, RN108779729, Rating Year 2024 which includes Compliance History (CH) components from September 01, 2019, through August 31, 2024.

# Sites Outside of Texas:

N/A

Preliminary Determination Summary Permit Numbers 175173, PSDTX1636, and GHGPSDTX238 Page 1

#### Preliminary Determination Summary

Wolf Hollow II Power LLC

Permit Numbers 175173, PSDTX1636, GHGPSDTX238

#### I. Applicant

Wolf Hollow II Power LLC 8787 Wolf Hollow Court Granbury, Texas 76048

#### II. Project Location

Wolf Hollow II 8787 Wolf Hollow Court Hood County Granbury, Texas 76048

### III. Project Description

Wolf Hollow II Power LLC owns and operates the Wolf Hollow II electric generating facility. The site currently consists of two combined cycle natural gas-fired combustion turbine generators (CTGs), an auxiliary boiler, a dew point heater, emergency equipment, and fugitives authorized by Permit No. 83638.

Wolf Hollow is seeking authorization to expand the existing Wolf Hollow II Power Plant and will be referred to as Wolf Hollow III (WHIII). The WHIII power project will consist of eight simple cycle CTGs, three emergency generators, turbine lube oil vents, three diesel storage tanks, and fugitives.

#### **Combustion Turbine Generator**

Each CTG is a General Electric 6E that will be fired with natural gas. The new units will be capable of generating approximately 44 MW each and are designed for peaking service, including daily startup and shutdown (SUSD) and extended periods of operation or non-operation.

#### **Diesel Emergency Generators**

Three diesel-fired emergency generators will be installed to provide electricity to essential service users during emergencies. Each emergency will have its own storage tank.

#### **Natural Gas Piping Fugitives**

Natural gas will be delivered to the site via pipeline and then metered and piped to the combustion turbine. The piping and fittings associated with the pipeline will be sources of fugitive emissions.

State of Texas County of Travis

APR 1 5 2025

I hereby certify this is a true and correct copy of a Texas Commission on Environmental Quality (TCEQ) document, which is filed in the Records of the Commission. Given under my hand and the seal of office.

Alternative Custodian of Records Texas Commission on Environmental Quality

# Maintenance, Startup and Shutdown (MSS)

Planned MSS emissions are being authorized in this project. This will result in separate emission rates for MSS in the table entitled "Emission Sources - Maximum Allowable Emission Rates," (MAERT). The startup and shutdown will have separate short term (hourly) limits and the annual emissions are not expected to exceed the normal operations annual emissions and are included in the annual emissions limits in the MAERT. The durations of startups and shutdowns are included in the Special Conditions of the permit.

Maintenance Activities are identified in Attachment A and are quantified on the MAERT as Emission Point Number (EPN): E-TRBMSSP3.

### IV. Emissions

Emission sources for the proposed project consists of the CTG, lube oil vents, emergency diesel generator, fire foam suppression diesel pump, and equipment fugitives.

Air Contaminant	Proposed Allowable Emission Rates (tpy)
NO <sub>x</sub>	251.49
CO	395.33
VOC	12.30
PM	56.18
PM <sub>10</sub>	56.18
PM <sub>2.5</sub>	56.18
SO <sub>2</sub>	4.01
H <sub>2</sub> SO <sub>4</sub>	0.49
CH <sub>2</sub> O	4.75
N <sub>2</sub> O	1.47
CH <sub>4</sub>	23.28
SF <sub>6</sub>	<0.01
CO <sub>2</sub>	795,579.38
CO <sub>2e</sub> <sup>1</sup>	796,623.70
CO <sub>2e<sup>2</sup></sub>	796,645.54

Note: SF<sub>6</sub> NO<sub>2</sub>, CH<sub>4</sub>, and CO<sub>2</sub> emission rates are for informational purposes only and does not constitute an enforceable limit. Carbon dioxide equivalents (CO<sub>2e</sub>) based on the following Global Warming Potentials (GWP): <sup>1</sup> found in Table A-1 of Subpart A 40 CFR Part 98 (78 FR 71904) for each pollutant: CO<sub>2</sub> (1), N<sub>2</sub>O (298), CH<sub>4</sub> (25), SF<sub>6</sub> (22,800) and effective prior to 01/2025. <sup>2</sup> found in Table A-1 of Subpart A 40 CFR Part 98 (89 FR 31894) for each pollutant: CO<sub>2</sub> (1), N<sub>2</sub>O (265), CH<sub>4</sub> (28), SF<sub>6</sub> (23,500) and effective on or after 01/2025.

# V. Federal Applicability

Plant III is in Hood County which is classified as attainment. The site is an existing major source with respect to the Prevention of Significant Deterioration (PSD) Program.

This is a project is a new source at an existing site, there are no changes in the contemporaneous period, and a baseline of zero was used for all pollutants. The new project will have the potential to emit emissions greater than the major modification significance level for the pollutants identified below. This is new source, and the baseline is zero. A minor NSR review was performed for all pollutants not triggering a federal review.

The following tables illustrate the annual project emissions for each pollutant and whether this pollutant triggers PSD review. These totals include MSS emissions.

Pollutant	Project Increase (tpy)	PSD Netting Trigger (tpy)	Netting Required (Y/N)	Net Emission Change (tpy)	PSD Major Mod Trigger	PSD Review Triggered (Y/N)
NOx	251.49	40	Y	N/A	40	Y
CO	395.33	100	Y	N/A	100	Y
VOC	12.30	40	N	N/A	40	N
PM	56.18	25	Y	N/A	25	Y
PM <sub>10</sub>	56.18	15	Y	N/A	15	Y
PM <sub>2.5</sub>	56.18	10	Y	N/A	10	Y
SO <sub>2</sub>	4.01	40	N	N/A	40	N
H <sub>2</sub> SO <sub>4</sub>	0.49	7	N	N/A	7	Ν

### Table 1. PSD Major Modification Trigger

### Table 2. GHG PSD Major Modification Trigger

Pollutant	Project Increase (tpy)	GHG Netting Trigger (tpy)	Netting Required (Y/N)	Net Emission Change (tpy)	GHG Major Mod Trigger	GHG Review Triggered (Y/N)
GHG, CO <sub>2e</sub> 1	796,623.70	75,000	Y	NA	75,000	Y
GHG, CO <sub>2e<sup>2</sup></sub>	796,645.54	75,000	Y	N/A	75,000	Y

Carbon dioxide equivalents (CO<sub>2e</sub>) based on the following Global Warming Potentials (GWP): <sup>1</sup> found in Table A-1 of Subpart A 40 CFR Part 98 (78 FR 71904) for each pollutant: CO<sub>2</sub> (1), N<sub>2</sub>O (298), CH<sub>4</sub> (25), SF<sub>6</sub> (22,800) and effective prior to 01/2025. <sup>2</sup> found in Table A-1 of Subpart A 40 CFR Part 98 (89 FR 31894) for each pollutant: CO<sub>2</sub> (1), N<sub>2</sub>O (265), CH<sub>4</sub> (28), SF<sub>6</sub> (23,500) and effective on or after 01/2025.

# VI. Control Technology Review

BACT for the proposed project is summarized in the table below for each emitting source and the pollutants that triggered PSD review, which are NOx, CO, PM/PM<sub>10</sub>/PM<sub>2.5</sub>, and GHGs as CO2e. State minor BACT was also evaluated for the other pollutants that did not trigger PSD review and is also summarized in the table below. The applicant submitted RACT/BACT/LAER Clearinghouse (RBLC) database search summaries for the pollutants that triggered PSD review (NOx, CO, PM/PM<sub>10</sub>/PM<sub>2.5</sub>, and GHGs as CO2e), and these RBLC search summary results are included in the table below. The EPA has agreed to accept the TCEQ three-tier BACT approach as equivalent to the EPA top-down BACT approach for PSD review when the following are considered: recently issued/approved permits within the state of Texas; recently issued/approved permits in other states; and control technologies contained within the EPA's RBLC. BACT determinations are based upon an evaluation of information from the Environmental Protection Agency's (EPA's) RACT/BACT/LAER Clearinghouse (RBLC), TCEQ Current BACT Spreadsheet (June 2019), TCEQ Gas Turbine list (February 2022), on-going permitting in Texas and other

states, and the TCEQ's continuing review of emissions control developments. The applicant fulfilled these requirements.

Source	EPN	BACT
		NO <sub>x</sub> : Dry low NOx (DLN) combustors will limit NO <sub>x</sub> emissions to 9.0 ppmvd corrected to 15 % O <sub>2</sub> on a rolling three-hour average. The RBLC search returned 50 projects for which natural gas- fired simple-cycle units were permitted between 2012 and 2021, with reported NO <sub>x</sub> emission limit.
		CO: Good combustion practices, and DLNs will limit CO to a level of 25.0 ppmvd on a rolling 3-hour average corrected to 15% O <sub>2</sub> . The proposed controls and emission limits are consistent with the expectations for control of CO for natural gas-fired combined cycle turbines and the result of the RBLC search returned reported CO emission limit; therefore, BACT is satisfied.
		VOC: Good combustion practices, DLNs, and an oxidation catalyst will limit VOC emissions to 2.0 ppmvd for both natural gas and diesel corrected to $15\% O_2$ on rolling three-hour average. The proposed controls and emission limits represent BACT.
Simple Cycle Turbine	E-SCT7 through E-SCT14	PM/PM <sub>10</sub> /PM <sub>2.5</sub> : PM/PM <sub>10</sub> /PM <sub>2.5</sub> is emitted from combustion processes due to the presence of ash and other inorganic constituents contained in the fuel, particulate matter in the inlet air, and incomplete combustion of the organic constituents in the fuel. PM/PM <sub>10</sub> /PM <sub>2.5</sub> emissions is due to incomplete combustion and are anticipated to be relatively low. A search of the RBLC and TCEQ Gas Turbine List shows that no add-on controls are required for natural gas-fired combustion turbines to control PM/PM <sub>10</sub> /PM <sub>2.5</sub> . Therefore, the use of good combustion practices to minimize emissions of particulate matter and the use of natural gas is BACT for PM/PM <sub>10</sub> /PM <sub>2.5</sub> .
		Sulfur Compound: Emissions of SO <sub>2</sub> occurs as a result of oxidation of sulfur in the natural gas-fired in the combustion turbines, with the majority of the sulfur converted to SO <sub>2</sub> . A portion of the SO <sub>2</sub> will be further converted to H <sub>2</sub> SO <sub>4</sub> , with a conversion contribution due to the action of the SCR. The formation of SO <sub>2</sub> and H <sub>2</sub> SO <sub>4</sub> will be minimized by using pipeline-quality natural gas with a sulfur content not exceeding 1.0 grains sulfur per 100 standard cubic feet on an hourly/annual basis. Therefore, the proposed fuel and sulfur limits represented are BACT for SO <sub>2</sub> and H <sub>2</sub> SO <sub>4</sub> .
		Greenhouses Gases (GHG): Simple cycle units serve a different purpose that the combined cycle turbine and their ability to quickly ramp up and down make them ideal for "peaking", quick ramping for use during periods with the highest electricity demand. Wolf Hollow proposing a limit per turbine of 1,482 lb CO <sub>2</sub> e/MWh and an

Source	EPN	BACT			
		operational limitation of 13,076,000MMBtu/yr (all turbines combined) firing on natural gas firing. A search of the RBLC and the TCEQ Gas Turbine List for facilities permitted since January 2012 to 2021 show that the CO <sub>2</sub> emission limits ranged from 1,276 to 1,707 lb/MWh. The proposed emission limit and operational limitation represents BACT.			
		Maintenance, Startup, and Shutdown (MSS): Operation of the combustion turbines will result in emissions from startup and shutdown. The combustion turbines will be started up and shut down in a manner that minimizes the emissions during these events. The duration of each startup and shutdown is limited to 60 minutes. BACT will be achieved by minimizing the duration of the startup and shutdown events (consistent with market demands), engaging the pollution control equipment as soon as practicable (based on vendor recommendations and guarantees), and meeting the emissions limitations on the MAERT.			
Turbine ST-SCTLOV7		VOC: The heating of recirculating lubrication oil in the gas turbine generates oil vapor and oil condensate droplets in the oil reservoir compartments. The venting of turbine lubrication oil is a minor source of VOC and PM/PM <sub>10</sub> /PM <sub>2.5</sub> emissions, represented as <0.01 lb/hr and 0.01 tpy for VOC and <0.01 lb/hr and 0.01 tpy for PM/PM10/PM2.5. These emissions will be controlled with oil mist eliminators.			
lube oil vent	ST-SCTLOV14	PM/PM <sub>10</sub> /PM <sub>2.5</sub> The TCEQ does not provide Tier 1 BACT guidelines lube oil vent emissions. There is no process code associated with lube oil vents that can be searched in the RBLC. However, a search by the permit reviewer for simple cycle energy projects in the RBLC and a review of other available permits identified a recently permitted facility with lube oil vent listed as a process source. These recent RBLC determinations identify mist eliminators as the control method. The proposed use of mist eliminators satisfies BACT.			
Diesel- Fired Generator	EGEN3, EGEN4, EGEN5	BACT will be achieved through firing diesel fuel containing normore than 15 parts per million sulfur by weight, proper operation, maintenance, and limiting annual operation to 100 hours per year for each engine. The requirement of NSPS Subpart IIII does not apply since the engines were constructed prior to 07/11/2005. However, the engines will meet the Tierr Exhaust Standard for Generator Sets, 40 CFR 1039, Append I, and have a non-resettable runtime meter.			
Diesel Storage Tanks	E-DSLTK3, E-DSLTK4, E-DSLTK5	BACT for fixed roof storage tanks with a capacity less than 25,000 gallons or containing a material with a true vapor pressure less than 0.5 psia is met by using submerged fill and uninsulated exterior surfaces exposed to the sun shall be white or aluminum. The diesel tanks have a max storage capacity of 1,900 gallons and will be storing ultra-low sulfur diesel (0.01 psia).			
Fugitives	E-NGFUG-P3	Includes VOC which originate from the natural gas fuel lines. The uncontrolled VOC emissions are less than 10 tons per year and due to the negligible amount of GHG emissions from			

Source	EPN	BACT
		process fugitives, the only available control, implementation of a Leak Detection and Repair Program (LDAR), is not cost effective and would result in no significant reduction in overall project GHG emissions. Periodic audio/visual/olfactory inspections will be performed for natural gas. Any leaks will be repaired when detected. Therefore, BACT is satisfied.
MSS Fugitives	E-TRBMSSP3	Emissions associated with result from routine maintenance activities undertaken to ensure the proper operability of equipment. Good work practices and limiting the frequency and duration of maintenance activities represents BACT.
SF6 Electrical Equipment	E-SF6FUG	The use of circuit breakers with totally enclosed insulation systems equipped with a low-pressure alarm/lockout is BACT.

## VII. Air Quality Analysis

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

## A. De Minimis Analysis

A De Minimis analysis was initially conducted to determine if a full impacts analysis would be required. The De Minimis analysis modeling results indicate that 1-hr NO<sub>2</sub> and 24-hr and annual  $PM_{2.5}$  (NAAQS [National Ambient Air Quality Standards] and Increment) exceed the respective de minimis concentrations and require a full impacts analysis. The De Minimis analysis modeling results for annual NO<sub>2</sub>, 1-hr and 8-hr CO and 24-hr and annual PM<sub>10</sub> indicate that the project is below the respective de minimis concentrations and no further analysis is required.

The justification for selecting EPA's interim 1-hr NO<sub>2</sub> De Minimis level is based on the assumptions underlying EPA's development of the 1-hr NO<sub>2</sub> De Minimis level. As explained in EPA guidance memoranda<sup>1</sup>, EPA believes it is reasonable as an interim approach to use a De Minimis level that represents 4% of the 1-hr NO<sub>2</sub> NAAQS.

The PM<sub>2.5</sub> and ozone De Minimis levels are EPA recommended De Minimis levels. The use of EPA recommended De Minimis levels is sufficient to conclude that a proposed source will not cause or contribute to a violation of an ozone and PM<sub>2.5</sub> NAAQS or PM<sub>2.5</sub> Prevention of Significant Deterioration (PSD) increments based on the analyses documented in EPA guidance and policy memoranda<sup>2</sup>.

While the De Minimis levels for both the NAAQS and increment are identical for  $PM_{2.5}$  in the table below, the procedures to determine significance (that is, predicted concentrations to compare to the De Minimis levels) are different. This difference occurs because the NAAQS for  $PM_{2.5}$  are statistically-based, but the corresponding increments are exceedance-based.

Table 1. Modeling Results for PSD De Minimis Analysis in Micrograms Per Cubic Meter (µg/m<sup>3</sup>)

Pollutant	Averaging Time	GLCmax <sup>3</sup> (µg/m <sup>3</sup> )	, De Minimis (μg/m³)
PM10	24-hr	1.83	5

<sup>&</sup>lt;sup>1</sup> www.tceq.texas.gov/assets/public/permitting/air/memos/guidance\_1hr\_no2naaqs.pdf

<sup>&</sup>lt;sup>2</sup> www.tceq.texas.gov/permitting/air/modeling/epa-mod-guidance.html

<sup>&</sup>lt;sup>3</sup> Ground level maximum concentration

Pollutant	Averaging Time	GLCmax <sup>3</sup> (µg/m <sup>3</sup> )	De Minimis (μg/m³)
PM10	Annual	0.36	1
PM <sub>2.5</sub> (NAAQS)	24-hr	1.35	1.2
PM <sub>2.5</sub> (NAAQS)	Annual	0.34	0.13
PM <sub>2.5</sub> (Increment)	24-hr	1.83	1.2
PM <sub>2.5</sub> (Increment)	Annual	0.36	0.13
NO <sub>2</sub>	1-hr	35	7.5
NO <sub>2</sub>	Annual	0.58	1
СО	1-hr	181	2000
СО	8-hr	19	500

The 24-hr and annual  $PM_{2.5}$  (NAAQS) and 1-hr NO<sub>2</sub> GLCmax are based on the highest fiveyear averages of the maximum predicted concentrations determined for each receptor. The GLCmax for all other pollutants and averaging times represent the maximum predicted concentrations over five years of meteorological data.

EPA intermittent guidance was relied on for the 1-hr NO<sub>2</sub> PSD De Minimis and NAAQS analyses. Refer to the Modeling Emissions Inventory section for details.

To evaluate secondary PM<sub>2.5</sub> impacts, the applicant provided an analysis based on a Tier 1 demonstration approach consistent with EPA's Guideline on Air Quality Models (GAQM). Specifically, the applicant used a Tier 1 demonstration tool developed by EPA referred to as Modeled Emission Rates for Precursors (MERPs). The basic idea behind the MERPs is to use technically credible air quality modeling to relate precursor emissions and peak secondary pollutants impacts from a source. Using data associated with the 500 tpy Parker County source, the applicant estimated 24-hr and annual secondary PM<sub>2.5</sub> concentrations of 0.25  $\mu$ g/m<sup>3</sup> and 0.005  $\mu$ g/m<sup>3</sup>, respectively. Since the combined direct and secondary 24-hr and annual PM<sub>2.5</sub> impacts are above the De minimis levels, a full impacts analysis is required.

 Table 2. Modeling Results for Ozone PSD De Minimis Analysis

 in Parts per Billion (ppb)

Pollutant	Averaging Time	GLCmax (ppb)	De Minimis (ppb)
O <sub>3</sub>	8-hr	0.989	1

The applicant performed an  $O_3$  analysis as part of the PSD AQA. The applicant evaluated project emissions of  $O_3$  precursor emissions (NO<sub>X</sub> and VOC). For the project NO<sub>X</sub> and VOC emissions, the applicant provided an analysis based on a Tier 1 demonstration approach consistent with EPA's GAQM. Specifically, the applicant used a Tier 1 demonstration tool developed by the EPA referred to as MERPs. Using data associated with the 500 tpy Parker County source, the applicant estimated an 8-hr  $O_3$  concentration of 0.989 ppb. When the estimates of ozone concentrations from the project emissions are added together, the results are less than the De Minimis level.

# B. Air Quality Monitoring

The De Minimis analysis modeling results indicate that 24-hr PM<sub>10</sub>, annual NO<sub>2</sub>, and 8-hr CO are below their respective monitoring significance level.

Pollutant	Averaging Time	GLCmax (µg/m³)	Significance (µg/m³)
PM <sub>10</sub>	24-hr	1.83	10
NO <sub>2</sub>	Annual	0.58	14
CO	8-hr	19	575

Table 3. Modeling Results for PSD Monitoring Significance Levels

The GLCmax represent the maximum predicted concentrations over five years of meteorological data.

The applicant evaluated ambient  $PM_{2.5}$  monitoring data to satisfy the requirements for the pre-application air quality analysis.

Background concentrations for PM<sub>2.5</sub> were obtained from the EPA AIRS monitor 481390016 located at 2725 Old Fort Worth Rd., Midlothian, Ellis County. The three-year average (2019-2021) of the 98th percentile of the annual distribution of the 24-hr concentrations was used for the 24-hr value (17.51 ug/m<sup>3</sup>). The three-year average (2019-2021) of the annual concentrations was used for the annual value (7.78 ug/m<sup>3</sup>). The use of this monitor is reasonable based on a comparison of county-wide emissions, population, and a quantitative review of emissions sources in the surrounding area of the monitor site relative to the project site. Please note that the selected monitor was discontinued April 2022. Although the data relied on is older, the applicant noted that data from this representative monitoring station located within the same airshed offers background concentrations estimates that are more representative to the site location than selecting alternative data from a monitor outside the airshed or state. These background concentrations were also used as part of the NAAQS analysis.

Since the project has a net emissions increase of 100 tpy or more of VOC or NO<sub>X</sub>, the applicant evaluated ambient  $O_3$  monitoring data to satisfy the requirements for the pre-application air quality analysis.

Background concentrations for ozone were obtained from EPA AIRS monitor 482210001 located at 200 N Gordon St., Granbury, Hood County. The applicant used the three-year average (2021-2023) of the annual fourth highest daily maximum 8-hr concentrations in the analysis (76 ppb). This monitor is reasonable based on the applicant's quantitative review of emissions sources in the surrounding area of the monitor site relative to the project site and proximity of the monitor to the project site (approximately 12.5 kilometers (km) northwest). The proposed project is located in an attainment area for ozone and is required to obtain a PSD permit<sup>4</sup>. The PSD permitting program requires that proposed new major stationary sources and major modifications must demonstrate that the emissions from the proposed source or modification will not cause or contribute to a violation of any NAAQS<sup>5</sup>. The predicted concentrations in Table 2 demonstrate the proposed project would not cause or contribute to a violation of the NAAQS.

# C. National Ambient Air Quality Standard (NAAQS) Analysis

<sup>&</sup>lt;sup>4</sup> October 26, 2015 Federal Register (80 FR 65292)

<sup>&</sup>lt;sup>5</sup> 40 Code of Federal Regulations (CFR) 52.21(k)

The De Minimis analysis modeling results indicate that 24-hr and annual  $PM_{2.5}$  and 1-hr  $NO_2$  exceed the respective de minimis concentration and require a full impacts analysis. The full NAAQS modeling results indicate the total predicted concentrations will not result in an exceedance of the NAAQS.

Pollutant	Averaging Time	GLCmax (µg/m³)	Background (μg/m³)	Total Conc. = [Background + GLCmax] (µg/m³)	Standard (µg/m³)
PM <sub>2.5</sub>	24-hr	4.03	17.51	21.54	35
PM <sub>2.5</sub>	Annual	0.66	7.78	8.44	9
NO <sub>2</sub>	1-hr	164.33	See background discussion below	164.33	188

Table 4	Total Concentrations for PSD NAAOS	(Concentrations > De Minimis)
	Total Concentrations for FOD NAAgo	

The 24-hr PM<sub>2.5</sub> GLCmax is the highest five-year average of the 98th percentile of the annual distribution of predicted 24-hr concentrations determined for each receptor. The annual PM<sub>2.5</sub> GLCmax is the maximum five-year average of the annual concentrations determined for each receptor. The 1-hr NO<sub>2</sub> GLCmax is the highest five-year average of the 98th percentile of the annual distribution of predicted daily maximum 1-hr concentrations determined for each receptor.

Background concentrations for NO<sub>2</sub> were obtained from the EPA AIRS monitor 483491051 at Corsicana Airport, Corsicana, Navarro County. For the 1-hr NO<sub>2</sub> NAAQS analysis, the applicant conducted the evaluation by combining NO<sub>2</sub> background concentrations with the predicted concentrations on a seasonal-hour of day basis for each modeled receptor. The applicant followed EPA guidance when developing seasonal-hour of day background concentrations. The seasonal-hour of day background concentrations were based on the three-year average (2020-2022) of the 98th percentile of the annual distribution of the maximum daily 1-hr concentrations for each season and hour of day. These background values were then used in the model (as background scalars) to be combined with model predictions giving a total predicted concentration. Monitoring data for 2023 are available but less than 50% complete for the second guarter and could not be validated since it does not meet the EPA's requirement for completeness to use the substitution test; however, ADMT reviewed the available monitoring data and verified that the background concentrations used are comparable to the recent data and relying on complete data is reasonable. The use of this monitor is reasonable based on a comparison of county-wide emissions, population, and a quantitative review of emissions sources in the surrounding area of the monitor site relative to the project site.

As stated above, to evaluate secondary PM<sub>2.5</sub> impacts, the applicant provided an analysis based on a Tier 1 demonstration approach consistent with EPA's GAQM. Specifically, the applicant used a Tier 1 demonstration tool developed by EPA referred to as MERPs. Using data associated with the 500 tpy Parker County source, the applicant estimated 24-hr and annual secondary PM<sub>2.5</sub> concentrations of 0.25  $\mu$ g/m<sup>3</sup> and 0.005  $\mu$ g/m<sup>3</sup>, respectively. When these estimates are added to the GLCmax listed in Table 4 above, the results are less than the NAAQS.

# D. Increment Analysis

The De Minimis analysis modeling results indicate that 24-hr and annual PM<sub>2.5</sub> exceed the respective de minimis concentrations and require a PSD increment analysis.

Pollutant	Averaging Time	GLCmax (µg/m³)	Increment (µg/m³)
PM <sub>2.5</sub>	24-hr	6.63	9
PM <sub>2.5</sub>	Annual	0.71	4

Tabla 5	Poculto	for DOD	Incromont	Analysis
i able 5.	Results	10r P3D	increment	Analysis

The GLCmax for 24-hr PM<sub>2.5</sub> is the maximum high, second high (H2H) predicted concentration across five years of meteorological data. For annual PM<sub>2.5</sub>, the GLCmax represents the maximum predicted concentration over five years of meteorological data.

The GLCmax for 24-hr and annual  $PM_{2.5}$  reported in the table above represent the total predicted concentrations associated with modeling the direct  $PM_{2.5}$  emissions and the contributions associated with secondary  $PM_{2.5}$  formation (discussed above in the NAAQS Analysis section).

# E. Additional Impacts Analysis

The applicant performed an Additional Impacts Analysis as part of the PSD AQA. The applicant conducted a growth analysis and determined that population will not significantly increase as a result of the proposed project. The applicant conducted a soils and vegetation analysis and determined that all evaluated criteria pollutant concentrations are below their respective secondary NAAQS. The applicant meets the Class II visibility analysis requirement by complying with the opacity requirements of 30 Texas Administrative Code Chapter 111. The Additional Impacts Analyses are reasonable and possible adverse impacts from this project are not expected.

The ADMT evaluated predicted concentrations from the proposed project to determine if emissions could adversely affect a Class I area. The nearest Class I area, Wichita Mountains Wildlife Refuge, is located approximately 277 km from the proposed site.

The H<sub>2</sub>SO<sub>4</sub> 24-hr maximum predicted concentration of 0.04  $\mu$ g/m<sup>3</sup> occurred within the noncontiguous property to the north of Mitchel Bend Highway (approximately 365 meters to the north of the project boundary). The H<sub>2</sub>SO<sub>4</sub> 24-hr maximum predicted concentration occurring at the edge of the receptor grid, 30 km from the proposed sources, in the direction of the Wichita Mountains Wildlife Refuge Class I area is 0.004  $\mu$ g/m<sup>3</sup>. The Wichita Mountains Wildlife Refuge Class I area is 0.004  $\mu$ g/m<sup>3</sup>. The Wichita Mountains Wildlife Refuge Class I area is an additional 247 km from the edge of the receptor grid. Therefore, emissions of H<sub>2</sub>SO<sub>4</sub> from the proposed project are not expected to adversely affect the Wichita Mountains Wildlife Refuge Class I area.

The predicted concentrations of 24-hr and annual  $PM_{10}$ , 24-hr and annual  $PM_{2.5}$ , annual  $NO_2$ , and 1-hr and 3-hr  $SO_2$  are all less than de minimis levels at a distance of one km from the proposed sources in the direction the Wichita Mountains Wildlife Refuge Class I area. The predicted concentrations of 1-hr  $NO_2$  are greater than de minimis levels at a distance of 50 km from the proposed sources to the west of the project site; however, this will not adversely affect the Class I area since the concentrations decrease with distance, and the Class I area is an additional 227 km to the north. In addition, the  $NO_2$  1-hr maximum predicted concentration occurring at the edge of the receptor grid, 50 km from the proposed sources, in the direction of the Wichita Mountains Wildlife Refuge Class I area is 3.39  $\mu g/m^3$ , which is de minimis. As noted, the Wichita Mountains Wildlife Refuge Class I area is an additional 227 km from the edge of the receptor grid. Therefore, emissions from the proposed project are not expected to adversely affect the Wichita Mountains Wildlife Refuge Class I area is an additional 227 km from the edge of the receptor grid. Therefore, emissions from the proposed project are not expected to adversely affect the Wichita Mountains Wildlife Refuge Class I area.

# F. Minor Source NSR and Air Toxics Analysis

Pollutant	Averaging Time	GLCmax (µg/m <sup>3</sup> )	De Minimis (µg/m³)
SO <sub>2</sub>	1-hr	1.87	20.42
H <sub>2</sub> SO <sub>4</sub>	1-hr	0.23	1
H <sub>2</sub> SO <sub>4</sub>	24-hr	0.04	0.3

Table 6. Project-Related Modeling Results for State Property Line

# Table 7. Modeling Results for Minor NSR De Minimis

Pollutant	Averaging Time	GLCmax (µg/m³)	De Minimis (µg/m³)
SO <sub>2</sub>	1-hr	1.87	7.8
SO <sub>2</sub>	3-hr	1.06	25

The GLCmax are the maximum predicted concentrations associated with one year of meteorological data.

EPA intermittent guidance was relied on for the 1-hr SO<sub>2</sub> De Minimis analysis. Refer to the Modeling Emissions Inventory section for details.

The justification for selecting EPA's interim 1-hr SO<sub>2</sub> De Minimis level was based on the assumptions underlying EPA's development of the 1-hr SO<sub>2</sub> De Minimis level. As explained in EPA guidance memoranda<sup>6</sup>, EPA believes it is reasonable as an interim approach to use a De Minimis level that represents 4% of the 1-hr SO<sub>2</sub> NAAQS.

Source ID	1-hr GLCmax (μg/m³ per lb/hr)	Annual GLCmax (µg/m³ per lb/hr)
SCT07100	0.16	0.004
SCT08100	0.16	0.004
SCT09100	0.16	0.004
SCT10100	0.16	0.004
SCT11100	0.16	0.004
SCT12100	0.17	0.004
SCT13100	0.17	0.004
SCT14100	0.17	0.004
SCT07075	0.20	0.005
SCT08075	0.20	0.005

Table 8. Generic Modeling Results
Source ID	1-hr GLCmax (μg/m³ per Ib/hr)	Annual GLCmax (µg/m <sup>3</sup> per lb/hr)
SCT09075	0.20	0.005
SCT10075	0.20	0.005
SCT11075	0.20	0.005
SCT12075	0.20	0.005
SCT13075	0.20	0.005
SCT14075	0.20	0.005
SCT07050	0.23	0.006
SCT08050	0.23	0.006
SCT09050	0.23	0.006
SCT10050	0.23	0.006
SCT11050	0.23	0.006
SCT12050	0.23	0.006
SCT13050	0.23	0.006
SCT14050	0.23	0.006
E_GEN3	19.21	0.24
E_GEN4	21.43	0.24
E_GEN5	20.09	0.23
E_NGFUG3	2667	20.14
MSS_FVNT	5336.84	37.11

# Table 9. Minor NSR Project (Increases Only) Modeling Results for Health Effects

Pollutant & CAS# <sup>7</sup>	Averaging Time	GLCmax (µg/m³)	10% ESL <sup>8</sup> (µg/m³)
formaldehyde 50-00-0	1-hr	0.73	1.5
n-hexane 110-54-3	1-hr	0.23	560

<sup>&</sup>lt;sup>7</sup> Chemical Abstract Service Number

<sup>&</sup>lt;sup>8</sup> Effects Screening Level

Pollutant & CAS# <sup>7</sup>	Averaging Time	GLCmax (µg/m <sup>3</sup> )	10% ESL <sup>8</sup> (µg/m <sup>3</sup> )
n-hexane 110-54-3	Annual	<0.01	20

#### Table 10. Minor NSR Site-Wide Modeling Results for Health Effects

Pollutant	CAS#	Averaging Time	GLCmax (µg/m³)	GLCmax Location	ESL (µg/m³)
fuel oil No. 2	68476-30-2	1-hr	557	W Property Line	1000

The GLCmax location is listed in Table 10 above.

#### **MERA Summary**

The applicant provided a health effects review as specified in the TCEQ's Modelling and Effects Review Applicability (MERA) guidance (APDG 5874 dated March 2018) for project emission increases of non-criteria pollutants. The project emissions of non-criteria pollutants listed below satisfy the MERA and are protective of human health and the environment.

#### Health Effects Review - Minor NSR Project-Related Results

Pollutant & CAS#	Averaging Time	GLC <sub>max</sub> (µg/m <sup>3</sup> )	ESL (µg/m³)	Modelling and Effects Review Applicability (MERA) Step in Which Pollutant Screened Out
Propane	1-hr	N/A	N/A	Sten 0 simple asphyviate
74-98-6	Annual	N/A	N/A	
Propylene	1-hr	N/A	N/A	Stop 0 simple applyviate
115-07-1	Annual	N/A	N/A	Step 0 – simple aspriystate
n-Butane 106-97-8	1-hr	N/A	66,000	Step 2 – long-term ESL $\geq$ 10% of short-term ESL, short-term ESL is greater than 3,500 µg/m <sup>3</sup> and production emissions increase $\leq$ 0.4 lb/hr
	Annual	N/A	7100	Step 0 – long-term ESL ≥ 10% of short-term ESL
n-Pentane 109-66-0	1-hr	N/A	59,000	Step 2 – long-term ESL $\ge$ 10% of short-term ESL, short-term ESL is greater than 3,500 µg/m <sup>3</sup> and production emissions increase $\le$ 0.4 lb/hr
	Annual	N/A	7100	Step 0 – long-term ESL ≥ 10% of short-term ESL
n-hexane	1-hr	0.23	5600	Stap 2 CI (may $< 100/$ ESI
110-54-3	Annual	<0.00	200	Step 5 – GLOMAX < 10% ESL
Formaldehyde	1-hr	0.73	15	Step 3 – GLCmax < 10% ESL
50-00-0	Annual	N/A	3.3	Step 0 - Long-term ESL ≥ 10% of short-term ESL
Fuel oil No. 2	1-hr	556.53	1000	Step 7 – Sitewide modeling deemed
68476-30-2	Annual	0.06	100	acceptable by ADMT

#### A. Greenhouse Gases

EPA has stated that unlike the criteria pollutants for which EPA has historically issued PSD permits, there is no National Ambient Air Quality Standard (NAAQS) for GHGs, including no PSD increment. The global climate-change inducing effects of GHG emissions, according to the "Endangerment and Cause or Contribute Finding", are far-reaching and multidimensional (75 FR 66497). Climate change modeling and evaluations of risks and impacts are typically conducted for changes in emissions that are orders of magnitude larger than the emissions from individual projects that might be analyzed in PSD permit reviews. Quantifying the exact impacts attributable to a specific GHG source obtaining a permit in specific places and points would not be possible [EPA's PSD and Title V Permitting Guidance for GHGs at 48]. Thus, EPA has concluded in other GHG PSD permitting actions it would not be meaningful to evaluate impacts of GHG emissions on a local community in the context of a single permit.

The TCEQ has determined that an air quality analysis would provide no meaningful data and has not required the applicant to perform one. As stated in the preamble to TCEQ's adoption of the GHG PSD program, the impacts review for individual air contaminants will continue to be addressed, as applicable, in the state's traditional minor and major NSR permits program per 30 TAC Chapter 116.

#### VIII. Conclusion

Wolf Hollow has demonstrated that this project meets all applicable rules, regulations and requirements of the Texas and Federal Clean Air Acts. The proposed facilities and controls represent BACT. The modeling analysis indicates that the proposed project will not violate the NAAQS, cause an exceedance of the increment, or have any adverse impacts on soils, vegetation, or Class I Areas. In addition, the modeling predicted no exceedance of ESLs at all receptors for non-criteria contaminants evaluated.

The Executive Director of the TCEQ proposes a preliminary determination of issuance of this permit for Wolf Hollow to construct the electric power generating facilities and the associated support facilities, as proposed.

State of Texas County of Travis

APR 1 5 2025

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



document, which is filed in the Records of the Commission Given under my hand and the seal of office. 2.54.

I hereby certify this is a true and correct copy of a Texas Commission on Environmental Quality (TCEQ)

> Alternative Custodian of Records Texas Commission on Environmental Quality

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

November 22, 2024

TO: All interested persons.

RE: Wolf Hollow II Power, LLC Air Quality Permit Nos. 175173, GHGPSDTX238, and PSDTX1636

### Decision of the Executive Director.

The executive director has made a decision that the above-referenced permit application meets the requirements of applicable law. **This decision does not authorize construction or operation of any proposed facilities.** This decision will be considered by the commissioners at a regularly scheduled public meeting before any action is taken on this application unless all requests for contested case hearing or reconsideration have been withdrawn before that meeting.

Enclosed with this letter are instructions to view the Executive Director's Response to Public Comment (RTC) on the Internet. Individuals who would prefer a mailed copy of the RTC or are having trouble accessing the RTC on the website, should contact the Office of the Chief Clerk, by phone at (512) 239-3300 or by email at <u>chiefclk@tceq.texas.gov</u>. A complete copy of the RTC (including the mailing list), complete application, draft permit and related documents, including public comments, are available for review at the TCEQ Central Office in Austin, Texas. Additionally, a copy of the complete permit application, executive director's preliminary decision, draft permit, and the executive director's preliminary determination summary and executive director's air quality analysis, will be available for viewing and copying at the TCEQ Central Office, the TCEQ Dallas/Fort Worth Regional Office, and at the Hood County Library, 222 North Travis Street, Granbury, Hood County, Texas. The facility's compliance file, if any exists, is available for public review at the TCEQ Dallas/Fort Worth Regional Office, 2309 Gravel Dr, Fort Worth, Texas.

If you disagree with the executive director's decision, and you believe you are an "affected person" as defined below, you may request a contested case hearing. In addition, anyone may request reconsideration of the executive director's decision. The procedures for the commission's evaluation of hearing requests/requests for reconsideration are located in 30 Texas Administrative Code Chapter 55, Subchapter F. A brief description of the procedures for these two types of requests follows.

# How to Request a Contested Case Hearing.

It is important that your request include all the information that supports your right to a contested case hearing. You must demonstrate that you meet the applicable legal requirements to have your hearing request granted. The commission's consideration of your request will be based on the information you provide.

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How is our customer service? tceq.texas.gov/customersurvey printed on recycled paper The request must include the following:

- (1) Your name, address, daytime telephone number, and, if possible, a fax number.
- (2) If the request is made by a group or association, the request must identify:
  - (A) one person by name, address, daytime telephone number, and, if possible, the fax number, of the person who will be responsible for receiving all communications and documents for the group;
  - (B) the comments on the application submitted by the group that are the basis of the hearing request; and
  - (C) by name and physical address one or more members of the group that would otherwise have standing to request a hearing in their own right. The interests the group seeks to protect must relate to the organization's purpose. Neither the claim asserted nor the relief requested must require the participation of the individual members in the case.
- (3) The name of the applicant, the permit number and other numbers listed above so that your request may be processed properly.
- (4) A statement clearly expressing that you are requesting a contested case hearing. For example, the following statement would be sufficient: "I request a contested case hearing."

Your request must demonstrate that you are an "**affected person**." An affected person is one who has a personal justiciable interest related to a legal right, duty, privilege, power, or economic interest affected by the application. Your request must describe how and why you would be adversely affected by the proposed facility or activity in a manner not common to the general public. For example, to the extent your request is based on these concerns, you should describe the likely impact on your health, safety, or uses of your property which may be adversely affected by the proposed facility or activities. To demonstrate that you have a personal justiciable interest, you must state, as specifically as you are able, your location and the distance between your location and the proposed facility or activities. A person who may be affected by emissions of air contaminants from the facility is entitled to request a contested case hearing.

A person permanently residing within 440 yards of a concrete batch plant authorized by the Air Quality Standard Permit for Concrete Batch Plants is an affected person who is entitled to request a contested case hearing. The hearing request must state a personal justiciable interest.

Your request must raise disputed issues of fact that are relevant and material to the commission's decision on this application that were raised **by you** during the public comment period. The request cannot be based solely on issues raised in comments that you have withdrawn.

To facilitate the commission's determination of the number and scope of issues to be referred to hearing, you should: 1) specify any of the executive director's responses to **your** comments that you dispute; 2) the factual basis of the dispute; and 3) list any disputed issues of law.

# How to Request Reconsideration of the Executive Director's Decision.

Unlike a request for a contested case hearing, anyone may request reconsideration of the executive director's decision. A request for reconsideration should contain your name, address, daytime phone number, and, if possible, your fax number. The request must state that you are requesting reconsideration of the executive director's decision, and must explain why you believe the decision should be reconsidered.

# **Deadline for Submitting Requests.**

A request for a contested case hearing or reconsideration of the executive director's decision must be **received by** the Chief Clerk's office no later than **30 calendar days** after the date of this letter. You may submit your request electronically at <u>www.tceq.texas.gov/agency/decisions/cc/comments.html</u> or by mail to the following address:

Laurie Gharis, Chief Clerk TCEQ, MC-105 P.O. Box 13087 Austin, Texas 78711-3087

## **Processing of Requests.**

Timely requests for a contested case hearing or for reconsideration of the executive director's decision will be referred to the TCEQ's Alternative Dispute Resolution Program and set on the agenda of one of the commission's regularly scheduled meetings. Additional instructions explaining these procedures will be sent to the attached mailing list when this meeting has been scheduled.

# How to Obtain Additional Information.

If you have any questions or need additional information about the procedures described in this letter, please call the Public Participation and Education Program, toll free, at 1-800-687-4040.

Sincerely,

Laurie Gharis

Laurie Gharis Chief Clerk

LG/erg Enclosure

### EXECUTIVE DIRECTOR'S RESPONSE TO PUBLIC COMMENT for Wolf Hollow II Power, LLC Air Quality Permit Nos. 175173, GHGPSDTX238, and PSDTX1636

The Executive Director has made the Response to Public Comment (RTC) for the application by Wolf Hollow II Power, LLC for Air Quality Permit Nos. 175173, GHGPSDTX238, and PSDTX1636 is available for viewing on the Internet. You may view and print the document by visiting the TCEQ Commissioners' Integrated Database at the following link:

https://www.tceq.texas.gov/goto/cid

In order to view the RTC at the link above, enter the TCEQ ID Number for this application (175173, GHGPSDTX238, or PSDTX1636) and click the "Search" button. The search results will display a link to the RTC.

Individuals who would prefer a mailed copy of the RTC or are having trouble accessing the RTC on the website, should contact the Office of the Chief Clerk, by phone at (512) 239-3300 or by email at <u>chiefclk@tceq.texas.gov</u>.

# **Additional Information**

For more information on the public participation process, you may contact the Office of the Public Interest Counsel at (512) 239-6363 or call the Public Education Program, toll free, at (800) 687-4040.

A complete copy of the RTC (including the mailing list), the complete application, the draft permit, and related documents, including comments, are available for review at the TCEQ Central Office in Austin, Texas. Additionally, a copy of the complete permit application, executive director's preliminary decision, draft permit, and the executive director's preliminary determination summary and executive director's air quality analysis, will be available for viewing and copying at the TCEQ Central Office, the TCEQ Dallas/Fort Worth Regional Office, and at the Hood County Library, 222 North Travis Street, Granbury, Hood County, Texas. The facility's compliance file, if any exists, is available for public review at the TCEQ Dallas/Fort Worth Regional Office, 2309 Gravel Dr, Fort Worth, Texas.



COMISIÓN DE CALIDAD AMBIENTAL DE TEXAS

Protegiendo a Texas al Reducir y Prevenir la Contaminación

22 de noviembre de 2024

- TO: Todas las personas interesadas.
- RE: Wolf Hollow II Power, LLC Permiso de calidad del aire Nos. 175173, GHGPSDTX238, and PSDTX1636

# Decisión del Director Ejecutivo.

El director ejecutivo ha tomado la decisión de que la solicitud de permiso mencionada anteriormente cumple con los requisitos de la ley aplicable. **Esta decisión no autoriza la construcción u operación de ninguna instalación propuesta.** Esta decisión será considerada por los comisionados en una reunión pública programada regularmente antes de que se tome cualquier medida sobre esta solicitud, a menos que todas las solicitudes de audiencia o reconsideración de casos impugnados hayan sido retiradas antes de esa reunión.

Se adjuntan a esta carta las instrucciones para ver en Internet la Respuesta del Director Ejecutivo al Comentario Público (RTC). Las personas que prefieran una copia por correo del RTC o que tengan problemas para acceder al RTC en el sitio web, deben comunicarse con la Oficina del Secretario Oficial, por teléfono al (512) 239-3300 o por correo electrónico a <u>chiefclk@tceq.texas.gov</u>. Una copia completa del RTC (incluida la lista de correo), la solicitud completa, el borrador del permiso y los documentos relacionados, incluidos los comentarios públicos, están disponibles para su revisión en la Oficina Central de TCEQ en Austin, Texas. Además, una copia de la solicitud de permiso, la decisión preliminar del director ejecutivo, el borrador del permiso y el resumen de la determinación preliminar del director ejecutivo y el análisis de la calidad del aire del director ejecutivo, estarán disponibles para su visualización y copia en la Oficina Central de TCEQ, la Oficina Regional de TCEQ Dallas/Fort Worth y Hood County Library, 222 North Travis Street, Granbury, Hood County, Texas. El expediente de cumplimiento de la instalación, si existe, está disponible para revisión pública en la Oficina Regional de TCEQ Dallas/Fort Worth, Texas.

Si no está de acuerdo con la decisión del director ejecutivo y cree que es una "persona afectada" como se define a continuación, puede solicitar una audiencia de caso impugnado. Además, cualquier persona puede solicitar la reconsideración de la decisión del director ejecutivo. Los procedimientos para la evaluación de la comisión de las solicitudes de audiencia/solicitudes de reconsideración se encuentran en 30 Código Administrativo de Texas, Capítulo 55, Subcapítulo F. A continuación, se presenta una breve descripción de los procedimientos para estas dos solicitudes.

# Cómo solicitar una audiencia de caso impugnado.

Es importante que su solicitud incluya toda la información que respalde su derecho a

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una audiencia de caso impugnado. Su solicitud de audiencia debe demostrar que cumple con los requisitos legales aplicables para que se le conceda su solicitud de

audiencia. La consideración de la comisión de su solicitud se basará en la información que usted proporcione.

La solicitud debe incluir lo siguiente:

- (1) Su nombre, dirección, número de teléfono durante el día y, si es posible, un número de fax.
- (2) Si la solicitud es realizada por un grupo o asociación, la solicitud debe identificar:
  - (A) una persona por nombre, dirección, número de teléfono durante el día y, si es posible, el número de fax, de la persona que será responsable de recibir todas las comunicaciones y documentos para el grupo.;
  - (B) los comentarios sobre la solicitud presentada por el grupo que constituyen la base de la solicitud de audiencia; y
  - (C) por nombre y dirección física, uno o más miembros del grupo que de otro modo tendrían derecho a solicitar una audiencia por derecho propio. Los intereses que el grupo busca proteger deben estar relacionados con el propósito de la organización. Ni la reclamación alegada ni la reparación solicitada deben requerir la participación de los miembros individuales en el caso.
- (3) El nombre del solicitante, el número de permiso y otros números enumerados anteriormente para que su solicitud pueda procesarse adecuadamente.
- (4) Una declaración que exprese claramente que está solicitando una audiencia de caso impugnado. Por ejemplo, la siguiente declaración sería suficiente: "Solicito una audiencia de caso impugnado".

Su solicitud debe demostrar que usted es una **"persona afectada".** Una persona afectada es aquella que tiene un interés justiciable personal relacionado con un derecho, deber, privilegio, poder o interés económico legal afectado por la solicitud. Su solicitud debe describir cómo y por qué se vería afectado negativamente por la instalación o actividad propuesta de una manera que no sea común al público en general. Por ejemplo, en la medida en que su solicitud se base en estas preocupaciones, debe describir el impacto probable en su salud, seguridad o usos de su propiedad que puedan verse afectados negativamente por la instalación o las actividades propuestas. Para demostrar que tiene un interés personal justiciable, debe indicar, tan específicamente como pueda, su ubicación y la distancia entre su ubicación y la instalación o actividades propuestas. Una persona que pueda verse afectada por las emisiones de contaminantes del aire de la instalación tiene derecho a solicitar una audiencia de caso impugnado.

Una persona que reside permanentemente dentro de las 440 yardas de una planta dosificadora de concreto autorizada por el Permiso Estándar de Calidad del Aire para Plantas Dosificadoras de Concreto es una persona afectada que tiene derecho a solicitar una audiencia de caso impugnado. La solicitud de audiencia debe indicar un interés personal justiciable.

Su solicitud debe plantear cuestiones de hecho controvertidas que sean relevantes y materiales para la decisión de la comisión sobre esta solicitud que fueron planteadas **por usted** durante el período de comentarios públicos. La solicitud no puede basarse únicamente en cuestiones planteadas en los comentarios que haya retirado.

Para facilitar la determinación por parte de la comisión del número y alcance de los asuntos que se remitirán a la audiencia, usted debe: 1) especificar cualquiera de las

respuestas del director ejecutivo a **sus** comentarios que usted disputa; 2) la base fáctica de la disputa; y 3) enumerar cualquier cuestión de derecho en disputa.

# Cómo solicitar la reconsideración de la decisión del Director Ejecutivo.

A diferencia de una solicitud de audiencia de caso impugnado, cualquier persona puede solicitar la reconsideración de la decisión del director ejecutivo. Una solicitud de reconsideración debe contener su nombre, dirección, número de teléfono durante el día y, si es posible, su número de fax. La solicitud debe indicar que está solicitando la reconsideración de la decisión del director ejecutivo, y debe explicar por qué cree que la decisión debe ser reconsiderada.

# Fecha límite para la presentación de solicitudes.

La oficina del Secretario Oficial debe **recibir** una solicitud de audiencia de caso impugnado o reconsideración de la decisión del director ejecutivo a más tardar **30 días calendario** después de la fecha de esta carta. Puede enviar su solicitud electrónicamente a <u>www.tceq.texas.gov/agency/decisions/cc/comments.html</u> o por correo a la siguiente dirección:

> Laurie Gharis, Chief Clerk TCEQ, MC-105 P.O. Box 13087 Austin, Texas 78711-3087

## Procesamiento de solicitudes.

Las solicitudes oportunas para una audiencia de caso impugnado o para la reconsideración de la decisión del director ejecutivo se remitirán al Programa de Resolución Alternativa de Disputas de TCEQ y se incluirán en la agenda de una de las reuniones programadas regularmente de la comisión. Las instrucciones adicionales que explican estos procedimientos se enviarán a la lista de correo adjunta cuando se haya programado esta reunión.

# Cómo obtener información adicional.

Si tiene alguna pregunta o necesita información adicional sobre los procedimientos descritos en esta carta, llame al Programa de Educación Pública, al número gratuito, 1-800-687-4040.

Atentamente,

Laurie Gharis

Laurie Gharis Secretaria Oficial

LG/erg Recinto

### RESPUESTA DEL DIRECTOR EJECUTIVO AL COMENTARIO DEL PÚBLICO para Wolf Hollow II Power, LLC Permiso de calidad del aire Nos. 175173, GHGPSDTX238, and PSDTX1636

El Director Ejecutivo ha puesto a disposición de Internet la respuesta al comentario público (RTC) para la solicitud de Wolf Hollow II Power, LLC, del permiso de calidad del aire Nos. 175173, GHGPSDTX238, and PSDTX1636. Puede ver e imprimir el documento visitando la Base de Datos Integrada de los Comisionados de TCEQ en el siguiente enlace:

https://www.tceq.texas.gov/goto/cid

Para ver el RTC en el enlace anterior, ingrese el número de identificación TCEQ para esta solicitud (175173, GHGPSDTX238, o PSDTX1636) y haga clic en el botón "Buscar". Los resultados de la búsqueda mostrarán un enlace al RTC.

Las personas que prefieran una copia por correo del RTC o que tengan problemas para acceder al RTC en el sitio web, deben comunicarse con la Oficina del Secretario Oficial, por teléfono al (512) 239-3300 o por correo electrónico a <u>chiefclk@tceq.texas.gov</u>.

## Información adicional

Para obtener más información sobre el proceso de participación pública, puede comunicarse con la Oficina del Asesor de Interés Público al (512) 239-6363 o llamar al Programa de Educación Pública, al número gratuito, (800) 687-4040.

Una copia completa del RTC (incluida la lista de correo), la solicitud completa, el borrador del permiso y los documentos relacionados, incluidos los comentarios, están disponibles para su revisión en la Oficina Central de TCEQ en Austin, Texas. Además, una copia de la solicitud de permiso, la decisión preliminar del director ejecutivo, el borrador del permiso y el resumen de la determinación preliminar del director ejecutivo y el análisis de la calidad del aire del director ejecutivo, estarán disponibles para su visualización y copia en la Oficina Central de la TCEQ, la Oficina Regional de TCEQ Dallas/Fort Worth y Hood County Library, 222 North Travis Street, Granbury, Hood County, Texas. El expediente de cumplimiento de la instalación, si existe, está disponible para revisión pública en la Oficina Regional de TCEQ Dallas/Fort Worth, 2309 Gravel Dr, Fort Worth, Texas.

### MAILING LIST / LISTA DE CORREO for / para Wolf Hollow II Power, LLC Air Quality Permit No. 175173, GHGPSDTX238, and PSDTX1636 / Permiso de calidad del aire No. 175173, GHGPSDTX238, and PSDTX1636

<u>FOR THE APPLICANT /</u> PARA EL SOLICITANTE:

Daniel Inemer Vice President, Regional Operations Wolf Hollow II Power, LLC 8787 Wolf Hollow Court Granbury, Texas 76048

Albert Hatton III Manager, Environmental Programs Constellation 300 Exelon Way Kennett Square, Pennsylvania 19348

<u>INTERESTED PERSONS /</u> <u>PERSONAS INTERESADAS:</u>

See attached list. / Ver lista adjunto.

<u>FOR THE EXECUTIVE DIRECTOR /</u> <u>PARA EL DIRECTOR EJECUTIVO</u> <u>via electronic mail /</u> <u>por correo electrónico:</u>

Ryan Vise, Deputy Director Texas Commission on Environmental Quality External Relations Division Public Education Program MC-108 P.O. Box 13087 Austin, Texas 78711-3087

Katherine Keithley, Staff Attorney Texas Commission on Environmental Quality Environmental Law Division MC-173 P.O. Box 13087 Austin, Texas 78711-3087 Jason La, Technical Staff Texas Commission on Environmental Quality Air Permits Division MC-163 P.O. Box 13087 Austin, Texas 78711-3087

<u>FOR PUBLIC INTEREST COUNSEL /</u> <u>PARA ABOGADOS DE INTERÉS</u> <u>PÚBLICO</u> <u>via electronic mail /</u> <u>por correo electrónico:</u>

Garrett T. Arthur, Attorney Texas Commission on Environmental Quality Public Interest Counsel MC-103 P.O. Box 13087 Austin, Texas 78711-3087

<u>FOR THE CHIEF CLERK /</u> <u>PARA EL SECRETARIO OFICIAL</u> <u>via electronic mail</u> <u>por correo electrónico:</u>

Laurie Gharis, Chief Clerk Texas Commission on Environmental Quality Office of Chief Clerk MC-105 P.O. Box 13087 Austin, Texas 78711-3087 ADAIR , DONNA 8002 CONTRARY CREEK RD GRANBURY TX 76048-7607

ALLARD , MARY 1960 POTTS CT GRANBURY TX 76048-6781

ANDREWS, KEVIN COMMISSIONER PRECINCT 1

HOOD COUNTY 1200 W PEARL ST GRANBURY TX 76048-1834

BELL , JAMES 2503 PEBBLE DR GRANBURY TX 76048-2620

BOLES , JOE MAYOR THE CITY OF GLEN ROSE 201 NE VERNON GLENN ROSE TX 76043-4739

BROOKS , A 3580 RILEY CT GRANBURY TX 76048-7887

BROOKS , MARIE 3615 RILEY CT GRANBURY TX 76048-7711

BROWN , JIM 3135 BRAZOS RIVER DR GRANBURY TX 76048-5809

BROWNING , MRS VIRGINIA 2330 MITCHELL BEND HWY GRANBURY TX 76048-9203

BURTON , KIM 6503 TARA CT GRANBURY TX 76049-4449 ADAIR , DONNA & ROBERT 8002 CONTRARY CREEK RD GRANBURY TX 76048-7607

ALLARD , RONNIE 1960 POTTS CT GRANBURY TX 76048-6781

BARBER , ANDREA M 9028 BELLECHASE RD GRANBURY TX 76049-4303

BLANKENSHIP , DAVID 8311 CONTRARY CREEK RD GRANBURY TX 76048-7613

BRASWELL, DEBORAH & GENE 14655 MITCHELL BEND CT GRANBURY TX 76048-9602

BROOKS , CHRISTIAN 3550 RILEY CT GRANBURY TX 76048-7887

BROWN , ALONNA 3135 BRAZOS RIVER DR GRANBURY TX 76048-5809

BROWN , MONICA 3135 BRAZOS RIVER DR GRANBURY TX 76048-5809

BRUNNING , RICHARD 109 SKYLINE DR GLEN ROSE TX 76043-4313

BUSNELLI , CELINE EARTHJUSTICE STE 200 845 TEXAS ST HOUSTON TX 77002-2858 ADAIR , ROBERT 8002 CONTRARY CREEK RD GRANBURY TX 76048-7607

ANDREWS, KEVIN COMMISSIONER PRECINCT 1

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BEATTY , MARK 8015 CONTRARY CREEK RD GRANBURY TX 76048-7612

BLANKENSIP , LISA 8311 CONTRARY CREEK RD GRANBURY TX 76048-7613

BROOKING, CHRISTINE & WEEKS, TOM 8704 MITCHELL BEND CT GRANBURY TX 76048-7703

BROOKS , CURTIS 3615 RILEY CT GRANBURY TX 76048-7711

BROWN , CHRISTIANNA 3135 BRAZOS RIVER DR GRANBURY TX 76048-5809

BROWNING , MR NICK 2330 MITCHELL BEND HWY GRANBURY TX 76048-9203

BURNS, THE HONORABLE DEWAYNE STATE REPRESENTATIVE TEXAS HOUSE OF REPRESENTATIVES DISTRICT 58 PO BOX 2910 AUSTIN TX 78768-2910

BUSNELLI , CELINE EARTHJUSTICE STE 1000 1001 G ST NW WASHINGTON DC 20001-4545

00084

CANTU , MR RODRIGO G EARTHJUSTICE STE 200 845 TEXAS ST HOUSTON TX 77002-2858

CHASE , BRUCE 9450 WOLF HOLLOW CT GRANBURY TX 76048-7743

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COPENHAVER , SHENICE 8710 MITCHELL BEND CT GRANBURY TX 76048-7703

DEROCHE , MANDY EARTHJUSTICE STE 200 845 TEXAS ST HOUSTON TX 77002-2858

DUNN , WARD 8910 HOPSEWEE CT GRANBURY TX 76049-4012

DYKES , THOMAS 14901 MITCHELL BEND CT GRANBURY TX 76048-9602

EAGLE , DAVE COMMISSIONER PRECINCT 4 HOOD COUNTY 100 E PEARL ST GRANBURY TX 76048-2407

FARAIZL , WILLIAM 10045 ORCHARDS BLVD CLEBURNE TX 76033-1167

GOLLER , LYNNSEY 345 AZALEA TRL GRANBURY TX 76048-3331 CARMACK , RICKY 345 HOLLY CT GRANBURY TX 76048-6997

CHRISTIANSEN , DON 9902 AIR PARK DR GRANBURY TX 76049-4474

CONRAD , DEMETRA 307 CEDAR ST GLEN ROSE TX 76043-4714

COPENHAVER , TRAVIS 8710 MITCHELL BEND CT GRANBURY TX 76048-7703

DOSS , KEISHA 3909 COUNTRY MEADOWS RD GRANBURY TX 76049-8008

DURBIN , LORI 1301 COUNTY ROAD 414 GLEN ROSE TX 76043-6091

EAGLE , DAVE PO BOX 1496 GRANBURY TX 76048-8496

ENGLE , TOMMY 8701 MITCHELL BEND CT GRANBURY TX 76048-7703

FARMER , GERTRISHA 6416 BUENA VISTA DR GRANBURY TX 76049-4313

GRAFT , MELANIE 3815 BUENA VISTA CIR GRANBURY TX 76049-1610 CARUTHERS, BRIAN DIRECTOR OF TRANSPORTATION GRANBURY ISD 217 N JONES ST GRANBURY TX 76048-2030

CLEMENT , LISA COUNCIL MEMEBER, SEAT 1 CITY OF CRESSON 8901 E US HIGHWAY 377 CRESSON TX 76035-4359

COOPER , REGINA PO BOX 854 GRANBURY TX 76048-0854

CRAWFORD , ALAN 215 HIDDEN OAKS DR HUDSON OAKS TX 76087-8649

DOWDY , WYVEDA 9610 NUBBIN RIDGE CT GRANBURY TX 76048-7678

DYKES , KAY & TOM 14901 MITCHELL BEND CT GRANBURY TX 76048-9602

EAGLE , DAVE COMMISSIONER PRECINCT 4 HOOD COUNTY PO BOX 339 GRANBURY TX 76048-0339

ENGLISH , MACI 8225 CONTRARY CREEK RD GRANBURY TX 76048-7608

FRANCO , MARK CHAIRMAN HOOD COUNTY CLEAN AIR COALITION PO BOX 743 GRANBURY TX 76048-0743

GRAFT , MICHAEL 3815 BUENA VISTA CIR GRANBURY TX 76049-1610 HAEFELE , DR. HOLLY 2312 COUNTY ROAD 301 GLEN ROSE TX 76043-5667

HANNULA , ROBERTA 9516 NUTCRACKER CT GRANBURY TX 76049-4183

HAYES , BRENT 9420 NUBBIN RIDGE CT GRANBURY TX 76048-7676

HELTON , CLINT 8605 ASHLAND CT GRANBURY TX 76049-4101

HIGHSMITH , CYNTHIA MARIE 9712 BELLECHASE RD GRANBURY TX 76049-4438

HOLLIDAY , RHONDA 8519 KINGSLEY CIR GRANBURY TX 76049-4761

JARRATT , JAMES MAYOR CITY OF GRANBURY 116 W BRIDGE ST GRANBURY TX 76048-2160

JOSLIN , MR JOHN PO BOX 1664 GLEN ROSE TX 76043-1664

KEEL , JANET 2804 WIND MILL CT TOLAR TX 76476-5074

KLODD , LINDA & STEVE 9644 AIR PARK DR GRANBURY TX 76049-4450 HALL , JUANITA 6110 BELVIDERE CIR GRANBURY TX 76049-4224

HANNULA , ROLAND 9516 NUTCRACKER CT GRANBURY TX 76049-4183

HAYES , LINDA 9420 NUBBIN RIDGE CT GRANBURY TX 76048-7676

HENRIKSEN , JILL 8503 WEEMS ESTATES DR GRANBURY TX 76048-7752

HIGHSMITH , JOHN W 9712 BELLECHASE RD GRANBURY TX 76049-4438

HOUG , DOUGLAS 11007 ORCHARDS BLVD CLEBURNE TX 76033-1180

JOHNSON , GREG 10002 ORCHARDS BLVD CLEBURNE TX 76033-1160

KANAS , DAPHNE D 7619 RAVENSWOOD RD GRANBURY TX 76049-4746

KILLION , MARGARET 2125 OSPREY CT GRANBURY TX 76048-7733

KNOERNSCHILD , KEVIN 2388 W TANGLEWOOD DR SW SUPPLY NC 28462-5214 HALL , KENNETH 6110 BELVIDERE CIR GRANBURY TX 76049-4224

HARRIS , TIM 6121 WESTOVER DR GRANBURY TX 76049-4031

HAYES , TED 9420 NUBBIN RIDGE CT GRANBURY TX 76048-7676

HENSEL , HELEN 8529 WEEMS ESTATES DR GRANBURY TX 76048-7752

HOLLIDAY , PAUL 8519 KINGSLEY CIR GRANBURY TX 76049-4761

JARRATT , MR JAMES ST 110 PMB 278 1030 EAST HWY 377 GRANBURY TX 76048-1456

JONES , DENNA 8010 CONTRARY CREEK RD GRANBURY TX 76048-7607

KEEL, JANET & SETH 2804 WIND MILL CT TOLAR TX 76476-5074

KILLION , ROBERT 2125 OSPREY CT GRANBURY TX 76048-7733

KURCZ , MARCIA L 9636 AIR PARK DR GRANBURY TX 76049-4450 KURCZ , TIMOTHY J 9636 AIR PARK DR GRANBURY TX 76049-4450

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LEFTWICH , CHRISTINE C COUNTY CLERK HOOD COUNTY CLERKS OFFICE PO BOX 339 GRANBURY TX 76048-0339

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LOWERY , JANET M 7730 HAYWORTH HWY GRANBURY TX 76048-9207

MASSINGILL , RONALD JUDGE HOOD COUNTY 100 E PEARL ST GRANBURY TX 76048-2407

MCDERMOTT , MARK 2901 DURANT CT GRANBURY TX 76049-7013

MILBURN , JOHN 6411 PINEHURST DR GRANBURY TX 76049-2814

MOFFITT , FRANK 10008 ORCHARDS BLVD CLEBURNE TX 76033-1160

NIEBES , BRETT 1905 BURKETT CT CLEBURNE TX 76033-1169 LAKEY , DEANNA 8225 CONTRARY CREEK RD GRANBURY TX 76048-7608

LARSON , RANDALL D TETON VENTURES LLC 8506 ORMOND CT GRANBURY TX 76049-4738

LEWIS , JON R 7300 STEPHENSON RD GODLEY TX 76044-3978

LILLY , RICHARD 4109 BAR HARBOR CT GRANBURY TX 76049-5883

MARTIN , GREGORY SCOTT 2517 BIRCHWOOD DR GRANBURY TX 76049-4357

MATHEWS , MARK 11012 ORCHARDS BLVD CLEBURNE TX 76033-1170

MCGUFFEY , MARY E 3404 COUNTY ROAD 313 LOOP GLEN ROSE TX 76043-6704

MILLER , GARY & KATHY 2224 VIENNA DR GRANBURY TX 76048-1477

MORRIS , LORI 2401 BLISS CT GRANBURY TX 76048-7771

O'BRIEN , GLADYS 711 MILTON CT GRANBURY TX 76048-1131 LAKEY , DANIEL SCOTT 8225 CONTRARY CREEK RD GRANBURY TX 76048-7608

LATHERS , GERALDINE 2407 ROSEHILL LN GRANBURY TX 76048-7751

LICATA , CHUCK BROADCAST SPECIALIST CITY OF GRANBURY 116 W BRIDGE ST GRANBURY TX 76048-2160

LOVE , RANDALL J 9028 BELLECHASE RD GRANBURY TX 76049-4303

MASSINGILL , RONALD JUDGE HOOD COUNTY PO BOX 339 GRANBURY TX 76048-0339

MCDERMOTT , LISA 2901 DURANT CT GRANBURY TX 76049-7013

MCKENZIE , MICHELLE PO BOX 743 GRANBURY TX 76048-0743

MITCHELL , TOBY 2407 ROSEHILL LN GRANBURY TX 76048-7751

NICHOLS , WILLIAM 6512 COLONIAL DR GRANBURY TX 76049-4119

OCHOA , BRIANA 4910 MOSS ROCK TRL GRANBURY TX 76048-6421 OECHSLE , LIANA 2501 WILLS WAY DR GRANBURY TX 76049-8004

PEDROZA , COURTNEY 8691 MITCHELL BEND CT GRANBURY TX 76048-7702

POTTS , BARBARA 1989 POTTS CT GRANBURY TX 76048-6783

POTTS , STEVEN 1989 POTTS CT GRANBURY TX 76048-6783

RAINS , CHRISTY 2692 N FM 199 CLEBURNE TX 76033-9422

RAWLE , AMY 2501 RIVER COUNTRY LN GRANBURY TX 76048-7692

ROGERS , DAVID 1612 ANACONDA TRL GRANBURY TX 76048-6325

ROHDE , DANIEL R 8691 MITCHELL BEND CT GRANBURY TX 76048-7702

ROSE , ANNIE 2111 CASH POINT CT GRANBURY TX 76049-8073

RUBEL , CHRIS 10064 ORCHARDS BLVD CLEBURNE TX 76033-1160 PEARSON , KAREN 2330 MITCHELL BEND HWY GRANBURY TX 76048-9203

PEDROZA , JAY 8691 MITCHELL BEND CT GRANBURY TX 76048-7702

POTTS , BEVERLEY A 1999 POTTS CT GRANBURY TX 76048-6783

RAFFA , DAVID T 6200 TEZCUCO CT GRANBURY TX 76049-4229

RANDALL , TANNER 8225 CONTRARY CREEK RD GRANBURY TX 76048-7608

RINCONJR , MS JUAN & RINCON GONZALEZJR ,JUAN THE COMPANY 4065 W 106TH ST INGLEWOOD CA 90304-2017

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ROHDE , GWYNETH 2410 ROSEHILL LN GRANBURY TX 76048-7751

ROYER , EVA 520 W BLUFF ST GRANBURY TX 76048-1925

RUSSELL , DALE 2646 N FM 199 CLEBURNE TX 76033-9422 PEDEN , BRAD 9800 AIR PARK DR GRANBURY TX 76049-4402

PEDROZA , JONATHAN 8691 MITCHELL BEND CT GRANBURY TX 76048-7702

POTTS , LARRY M 1999 POTTS CT GRANBURY TX 76048-6783

RAINS , C R 2692 N FM 199 CLEBURNE TX 76033-9422

RAWLE , WESLEY 2501 RIVER COUNTRY LN GRANBURY TX 76048-7692

ROBERTS , OLEAN 8819 RAVENSWOOD RD GRANBURY TX 76049-8903

ROGERS , MARK PO BOX 831 TOLAR TX 76476-0831

ROHDE , NANCY 8691 MITCHELL BEND CT GRANBURY TX 76048-7702

RUBACK , MARTIN 10097 ORCHARDS BLVD CLEBURNE TX 76033-1167

RUSSELL , MRS KAREN J 2646 N FM 199 CLEBURNE TX 76033-9422 SAMPSON , CHESNEY UNIT A4 2692 N FM 199 CLEBURNE TX 76033-9422

SAMUELSON , NANNETTE 8802 S HAMPTON DR GRANBURY TX 76049-4716

SEIDER , BRIANA 2200 OSPREY CT GRANBURY TX 76048

SEIDER , WILLIAM 2200 OSPREY CT GRANBURY TX 76048

SHELLEY III , ADRIAN DONALD PUBLIC CITIZENS TEXAS OFFICE STE 2 309 E 11TH ST AUSTIN TX 78701-2787

SLOAN , SUZANNE 8504 ORMOND CT GRANBURY TX 76049-4738

STEELE , ALISON 9016 BONTURA RD GRANBURY TX 76049-4334

STRONG , SUSIE 6235 TEZCUCO CT GRANBURY TX 76049-4229

TABER JR , ROBERT M 9500 BELLECHASE RD GRANBURY TX 76049-4433

TANNER , RICHARD 10049 FLIGHT PLAN DR GRANBURY TX 76049-4456 SAMUELSON , MS NANNETTE COMMISSIONER PRECINCT 2 HOOD COUNTY PO BOX 339 GRANBURY TX 76048-0339

SAWICKY , MRS JACQULYNE CLEO TEXAS COALITION AGAINST CRYPTOMINING 818 SE COUNTY ROAD 2260 CORSICANA TX 75109-0629

SEIDER , JEFF 2145 OSPREY CT GRANBURY TX 76048-7733

SHADDEN , CHERYL 8405 CONTRARY CREEK RD GRANBURY TX 76048-7614

SIMS , AMANDA & HUNTER 3611 RILEY CT GRANBURY TX 76048-7711

SOPCHAK , NIKKI 9311 MONTICELLO DR GRANBURY TX 76049-4505

STEWART , LINDSEY 2145 OSPREY CT GRANBURY TX 76048-7733

TABER , CYNTHIA M 9406 BELLECHASE RD GRANBURY TX 76049-4430

TABOR , MICHAEL L UNIT B 5534 N HIGHWAY 144 GRANBURY TX 76048-7800

TAYLOR , MELANIE R 2301 LAKEWOOD CT GRANBURY TX 76049-5730 SAMUELSON , MS NANNETTE COMMISSIONER PRECINCT 2 HOOD COUNTY UNIT 106 5417 ACTON HWY GRANBURY TX 76049-2994

SCOTT , COLEB 6301 WEATHERBY RD GRANBURY TX 76049-1302

SEIDER , LEEANN 2145 OSPREY CT GRANBURY TX 76048-7733

SHAW , SHERI 601 BILLINGS RD TOLAR TX 76476-5337

SLATER , BOB 6424 BUENA VISTA DR GRANBURY TX 76049-4313

STANLEY , MORGAN 5401 STONEGATE CIR GRANBURY TX 76048-6508

STEWART , ZACHARY Q 2145 OSPREY CT GRANBURY TX 76048-7733

TABER , ROBERT 9406 BELLECHASE RD GRANBURY TX 76049-4430

TABOR , SUZY MIKE TABOR STUDIO UNIT B 5534 N HIGHWAY 144 GRANBURY TX 76048-7800

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TIBLJAS , KIM 9600 NUBBIN RIDGE CT GRANBURY TX 76048-7678

TURNER , JERRY 2304 WINTON TERRACE CT GRANBURY TX 76048-4364

WALDROD , RAE 3605 RILEY CT GRANBURY TX 76048-7711

WEBBER , JOSEPH 1921 BURKETT CT CLEBURNE TX 76033-1169

WEEKS , THOMAS 8704 MITCHELL BEND CT GRANBURY TX 76048-7703

WILSON , JACK COMMISSIONER PRECINCT 3 HOOD COUNTY PO BOX 339 GRANBURY TX 76048-0339

WIMBERLEY , MARY 700 TEMPLE HALL HWY GRANBURY TX 76049-8160

WOLF , SHANNON 4718 MEDINA ST GRANBURY TX 76048-6460

WORTHINGTON , ANNETTE 5503 FLAGSTICK DR GRANBURY TX 76049-4472 TIBLJAS , ED & KIM 9600 NUBBIN RIDGE CT GRANBURY TX 76048-7678

TORRES , SANTIAGO 3605 RILEY CT GRANBURY TX 76048-7711

VAUGHN , H JANE 12200 MITCHELL BEND CT GRANBURY TX 76048-9600

WALL , JAMES 1541 SEABISCUIT DR GRANBURY TX 76049-7894

WEBSTER , COREY 2407 ROSEHILL LN GRANBURY TX 76048-7751

WELCH , VERONICA ADMINISTRATIVE SERVICES MANAGER CITY OF GLEN ROSE PO BOX 1949 GLEN ROSE TX 76043-1949

WILSON , JACK COMMISSIONER PRECINCT 3 HOOD COUNTY 1200 W PEARL ST GRANBURY TX 76048-1834

WIMBERLEY , WALTER 4317 KRISTY CT GRANBURY TX 76049-8129

WOLFORD , ANDREW J 2309 VIENNA DR GRANBURY TX 76048-1469

WULLAERT , ANNABEL 10014 FLIGHT PLAN DR GRANBURY TX 76049-4455 TIBLJAS , EDWARD J 9600 NUBBIN RIDGE CT GRANBURY TX 76048-7678

TOWER , DANIELA 616 SIX FLAGS DR ARLINGTON TX 76011-6347

VICKERY , MONICA 3040 BEDFORD RD BEDFORD TX 76021-7347

WALLACE , DON 3507 OLD BARN CT GRANBURY TX 76048-3786

WEBSTER , JACOB 2407 ROSEHILL LN GRANBURY TX 76048-7751

WILLIAMS , VAN AUSTIN 5015 ENCHANTED CT GRANBURY TX 76048-6591

WIMBERLEY , JIMMY 700 TEMPLE HALL HWY GRANBURY TX 76049-8160

WOLF , PETER 4718 MEDINA ST GRANBURY TX 76048-6460

WOLFORD , LINDA 2309 VIENNA DR GRANBURY TX 76048-1469

#### TCEQ AIR QUALITY PERMIT NUMBERS 175173, GHGPSDTX238, and PSDTX1636

APPLICATION BY	§	<b>BEFORE THE</b>
WOLF HOLLOW II POWER, LLC	§	TEXAS COMMISSION ON
WOLF HOLLOW II	§	
GRANBURY, HOOD COUNTY	§	ENVIRONMENTAL QUALITY

#### EXECUTIVE DIRECTOR'S RESPONSE TO PUBLIC COMMENT

The Executive Director of the Texas Commission on Environmental Quality (the "commission" or "TCEQ") files this Response to Public Comment ("Response") on the New Source Review Authorization application and Executive Director's preliminary decision.

As required by Title 30 Texas Administrative Code (TAC) § 55.156, before an application is approved, the Executive Director prepares a response to all timely, relevant and material, or significant comments. The Office of Chief Clerk received timely comments from the following persons: Representative Dewayne Burns, Donna Adair, Robert Adair, Mary Allard, Ronnie Allard, Hood County Commissioners' Court (Kevin Andrews, Dave Eagle, Christine C Leftwich, Ronald Massingill, Nannette Samuelson, Jack Wilson ), Andrea M Barber, Mark Beatty, James Bell, David Blankenship, Lisa Blankenship, City of Glen Rose (Joe Boles and Veronica Welch), Christine Brooking, Curtis Brooks, Marie Brooks, Christian Brooks, A Brooks, Alonna Brown, Christianna Brown, Monica Brown, Jim Brown, Virginia Browning, Nick Browning, Richard Brunning, Kim Burton, Earthjustice (Celine Busnelli, Rodrigo G Cantu, and Mandy Deroche ), Hood County Clean Air Coalition (John Campbell, Brian Caruthers, Lisa Clement, Joe Drew, Mark Franco, James Jarratt, Chuck Licata, Ronald Massingill), Ricky Carmack, Bruce Chase, Don Christiansen, Demetra Conrad, Shenice Copenhaver, Travis Copenhaver, Alan Crawford, Keisha Doss, Wyveda Dowdy, Ward Dunn, Kay Dykes, Tom Dykes, Tommy Engle, Maci English, William Faraizl, Gertrisha Farmer, Lynnsey Goller, Juan Rincon Gonzalez, Michael Graft, Melanie Graft, Holly Haefele, Kenneth Hall, Juanita Hall, Roberta Hannula, Roland Hannula, Tim Harris, Ted Hayes, Linda Hayes, Brent Hayes, Clint Helton, Jill Henriksen, Helen Hensel, John W Highsmith, Cynthia Marie Highsmith, Paul Holliday, Rhonda Holliday, Douglas Houg, Greg Johnson, Denna Jones, John Joslin, Daphne D Kanas, Janet Keel, Seth Keel, Robert Killion, Margaret Killion, Timothy J Kurcz, Marcia L Kurcz, Daniel Scott Lakey, Deanna Lakey, Randall D Larson, Patricia Larson, Geraldine Lathers, Jon R Lewis, Ron L Liddell, Randall J Love, Janet M Lowery, Gregory Scott Martin, Mark Mathews, Mark McDermott, Lisa McDermott, Barbara Meuter, John Milburn, Gary Miller, Kathy Miller, Toby Mitchell, Frank Moffitt, William Nichols, Brett Niebes, Gladys O'Brien, Liana Oechsle, Nikki Sopchak, Karen Pearson, Brad Peden, Courtney Pedroza, Jonathan Pedroza, Jay Pedroza, Steven Potts, Barbara Potts, Beverley A Potts, Larry M Potts, David T Raffa, Christy Rains, C R Rains, Tanner Randall, Amy Rawle, Wesley Rawle, Olean Roberts, Mark Rogers, Gina Rogers, David Rogers, Daniel R Rohde, Gwyneth Rohde, Nancy Rohde, Eva Rover, Martin Ruback, Chris Rubel, Karen J Russell, Chesney Sampson, Jacqulyne Cleo Sawicky, William Seider, Jeff Seider, Leeann Seider, Briana Seider, Cheryl Shadden, Sheri Shaw, Public Citizen (Adrian Donald Shelley ), Amanda Sims, Hunter Sims, Bob Slater, Suzanne Sloan, Morgan Stanley, Alison Steele, Lindsey Stewart, Zachary Q Stewart, Robert M Taber, Michael L Tabor, Suzy Tabor, Richard Tanner, Melanie R Taylor, Timothy Taylor, Audrie Tibljas, Kim Tibljas, Edward J Tibljas, Ed

#### Executive Director's Response to Public Comment Wolf Hollow II Power, LLC, Permit Nos. 175173, GHGPSDTX238, and PSDTX1636 Page 2 of 37

Tibljas, Santiago Torres, Daniela Tower, Jerry Turner, Monica Vickery, Rae Waldrod, James Wall, Don Wallace, Joseph Webber, Corey Webster, Jacob Webster, Thomas Weeks, Van Austin Williams, Walter Wimberley, Mary Wimberley, Jimmy Wimberley, Shannon Wolf, Peter Wolf, Andrew J Wolford, Annette Worthington, Annabel Wullaert. This Response addresses all timely public comments received, whether or not withdrawn. If you need more information about this permit application or the permitting process please call TCEQ Public Education Program at 1-800-687-4040. General information about TCEQ can be found at our website at <u>www.tceq.texas.gov</u>.

#### BACKGROUND

#### **Description of Facility**

Wolf Hollow II Power, LLC (Applicant) has applied to TCEQ for a New Source Review Authorization under Texas Clean Air Act (TCAA) §382.0518. This will authorize the construction of a new facility that may emit air contaminants.

This permit will authorize the Applicant to construct new power generation facilities to be known as the Wolf Hollow III ("WHIII") expansion that will expand the existing Wolf Hollow II Power Plant . The plant is located at 8787 Wolf Hollow Ct, Granbury, Hood County. Contaminants authorized under this permit include carbon monoxide, nitrogen oxides, particulate matter including particulate matter with diameters of 10 microns or less and 2.5 microns or less, hazardous air pollutants, organic compounds, sulfur dioxide, sulfur hexafluoride, and sulfuric acid mist. The proposed plant will also emit greenhouse gases.

### Procedural Background

Before work is begun on the construction of a new facility that may emit air contaminants, the person planning the construction must obtain a permit from the commission. This permit application is for an initial issuance of Air Quality Permit Number 175173, Prevention of Significant Deterioration (PSD) Air Quality Permit Number PSDTX1636, and Greenhouse Gas (GHG) PSD Air Quality Permit Number GHGPSDTX238.

The permit application was received on January 25, 2024, and declared administratively complete on February 1, 2024. The Notice of Receipt and Intent to Obtain an Air Quality Permit (first public notice) for this permit application was published in English on March 2, 2024, in the *Hood County News*, and in Spanish on March 5, 2024 in the *La Prensa Comunidad*. The Notice of Application and Preliminary Decision for an Air Quality Permit (second public notice) was published on August 10, 2024, in English in the *Hood County News*, and in Spanish on August 6, 2024 in the *La Prensa Comunidad*. A public meeting was held on Monday, September 9, 2024, at 7:00 PM at the Lake Granbury Conference Center, located at 621 East Pearl Street, Granbury, Texas 76048. The notice of public meeting was published in English on August 10, 2024, in the *Hood County News*, and in Spanish on August 6, 2024 in the *La Prensa Comunidad*. The public meeting was published in English on August 10, 2024, in the *Hood County News*, and in Spanish on August 6, 2024 in the *La Prensa Comunidad*. The notice of public meeting was published in English on August 10, 2024, in the *Hood County News*, and in Spanish on August 6, 2024 in the *La Prensa Comunidad*. The public comment period ended on September 11, 2024. Because this application was received after September 1, 2015, it is subject to the procedural requirements of and rules implementing Senate Bill 709 (84th Legislature, 2015).

### COMMENTS AND RESPONSES

#### **Comment 1: Health Effects/Air Quality**

Commenters voiced concern about the effect of the emissions from the proposed project on the air quality and health of people, particularly sensitive populations such as the elderly, children, and people with existing medical conditions. Commenters also expressed concerns of potential health issues, such as hypertension, heart palpitations and issues, anxiety, stress, hair loss, lack of sleep, headaches, asthma, nosebleeds, breathing difficulty, dizziness, coughing, fatigue, nausea and gastrointestinal issues, conductive hearing loss, vertigo, tinnitus, migraines, and other health concerns. Commenters also expressed concerns about noxious gas and odors from the proposed project. Commenters expressed concern about the impact the proposed project might have on climate change. Commenters also voiced concern about lead and mercury emissions.

(Representative Dewayne Burns, Donna Adair, Robert Adair, Ronnie Allard, Mary Allard, Kevin Andrews, Andrea M. Barber, Mark Beatty, James Bell, David Blankenship, Lisa Blankenship, Joe Boles, Christine Brooking, A. Brooks, Christian Brooks, Marie Brooks, Curtis Brooks, Monica Brown, Jim Brown, Alonna Brown, Christianna Brown, Virginia Browning, Nick Browning, Richard Brunning, Kim Burton, Celine Busnelli, John Campbell, Rodrigo G. Cantu, Ricky Carmack, Brian Caruthers, Bruce Chase, Lisa Clement, Demetra Conrad, Shenice Copenhaver, Travis Copenhaver, Mandy Deroche, Keisha Doss, Wyveda Dowdy, Joe Drew, Ward Dunn, Kay Dykes, Tom Dykes, Dave Eagle, Tommy Engle, Maci English, William Faraizl, Gertrisha Farmer, Mark Franco, Lynnsey Goller, Melanie Graft, Michael Graft, Holly Haefele, Kenneth Hall, Juanita Hall, Roland Hannula, Roberta Hannula, Tim Harris, Brent Hayes, Ted Hayes, Linda Hayes, Clint Helton, Jill Henriksen, Helen Hensel, Cvnthia Marie Highsmith, John W. Highsmith, Rhonda Holliday, Paul Holliday, Douglas Houg, James Jarratt, Greg Johnson, Denna Jones, John Joslin, Daphne D. Kanas, Janet Keel, Seth Keel, Robert Killion, Margaret Killion, Timothy J. Kurcz, Marcia L. Kurcz, Daniel Scott Lakey, Deanna Lakey, Randall D. Larson, Patricia Larson, Geraldine Lathers, Christine C. Leftwich, Chuck Licata, Ron L. Liddell, Randall J. Love, Janet M. Lowery, Gregory Scott Martin, Ronald Massingill, Mark Mathews, Mark McDermott, Lisa McDermott, Barbara Meuter, Gary Miller, Kathy Miller, Toby Mitchell, Frank Moffitt, William Nichols, Brett Niebes, Liana Oechsle, Karen Pearson, Brad Peden, Jonathan Pedroza, Courtney Pedroza, Steven Potts, Beverley A. Potts, Barbara Potts, Larry M. Potts, David T. Raffa, C. R. Rains, Christy Rains, Tanner Randall, Wesley Rawle, Amy Rawle, Olean Roberts, Gina Rogers, Mark Rogers, Gwyneth Rohde, Nancy Rohde, Daniel R. Rohde, Eva Royer, Martin Ruback, Chris Rubel, Karen J. Russell, Nannette Samuelson, Jacqulyne Cleo Sawicky, Jeff Seider, Briana Seider, William Seider, Leeann Seider, Chervl Shadden, Sheri Shaw, Adrian Donald Shelley, Amanda Sims, Hunter Sims, Bob Slater, Suzanne Sloan, Nikki Sopchak, Morgan Stanley, Alison Steele, Lindsey Stewart, Zachary Q. Stewart, Robert M. Taber, Michael L. Tabor, Suzy Tabor, Richard Tanner, Timothy Taylor, Melanie R. Taylor, Kim Tibljas, Edward J. Tibljas, Audrie Tibljas, Santiago Torres, Jerry Turner, Rae Waldrod, James Wall, Joseph Webber, Jacob Webster, Corey Webster, Tom Weeks, Thomas Weeks, Veronica Welch, Van Austin Williams, Jack Wilson, Walter Wimberley, Jimmy Wimberley, Mary Wimberley, Shannon Wolf, Peter Wolf, Andrew J. Wolford, Annette Worthington, Annabel Wullaert)

**Response 1:** The Executive Director is required to review permit applications to ensure they will be protective of human health and the environment. For this type of air permit application, potential impacts to human health and welfare or the environment are determined by comparing the Applicant's proposed air emissions to appropriate state and federal standards and guidelines. These standards and guidelines include the National Ambient Air Quality Standards (NAAQS), TCEQ Effects Screening Levels (ESLs), and TCEQ rules. As described in detail below, the Executive Director determined that the emissions authorized by this permit are protective of both human health and welfare and the environment.

### NAAQS

The U.S. Environmental Protection Agency (EPA) created and continues to evaluate the NAAQS, which include both primary and secondary standards, for pollutants considered harmful to public health and the environment.<sup>1</sup> Primary standards protect public health, including sensitive members of the population such as children, the elderly, and those individuals with preexisting health conditions. Secondary NAAQS protect public welfare and the environment, including animals, crops, vegetation, visibility, and buildings, from any known or anticipated adverse effects from air contaminants. The EPA has set NAAQS for criteria pollutants, which include carbon monoxide (CO), lead (Pb), nitrogen dioxide (NO<sub>2</sub>), ozone (O<sub>3</sub>), sulfur dioxide (SO<sub>2</sub>), particulate matter (PM) less than or equal to 10 microns in aerodynamic diameter (PM<sub>2.5</sub>).

The Applicant conducted a NAAQS analysis for SO<sub>2</sub>, PM<sub>10</sub>, PM<sub>2.5</sub>, NO<sub>2</sub>, and CO. The first step of the NAAQS analysis is to compare the proposed modeled emissions against the established de minimis level. Predicted concentrations (GLCmax<sup>2</sup>) below the de minimis level are considered to be so low that they do not require further NAAQS analysis. Table 1 contains the results of the de minimis analysis.

Pollutant	Averaging Time	GLCmax (µg/m <sup>3</sup> )	De Minimis (µg/m³)
SO <sub>2</sub>	1-hr	1.87	7.8
SO <sub>2</sub>	3-hr	1.06	25

Table 1. Modeling Results for Prevention of Significant Deterioration (PSD) De Minimis in micrograms per cubic meter ( $\mu g/m^3$ )

<sup>1 40</sup> CFR 50.2

<sup>2</sup> The GLCmax is the maximum ground level concentration predicted by the modeling.

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Pollutant	Averaging Time	GLCmax (µg/m³)	De Minimis (µg/m³)
$PM_{10}$	24-hr	1.83	5
PM <sub>10</sub>	Annual	0.36	1
PM <sub>2.5</sub> (NAAQS)	24-hr	1.6*	1.2
PM <sub>2.5</sub> (NAAQS)	Annual	0.35*	0.13
PM <sub>2.5</sub> (Increment)	24-hr	2.08*	1.2
PM <sub>2.5</sub> (Increment)	Annual	0.37*	0.13
NO <sub>2</sub>	1-hr	35	7.5
NO <sub>2</sub>	Annual	0.58	1
СО	1-hr	181	2000
СО	8-hr	19	500

\*GLCmax represent the total predicted concentration associated with modeling the direct  $PM_{2.5}$  emissions and the contributions associated with secondary  $PM_{2.5}$  formation.

The pollutants below the de minimis level should not cause or contribute to an exceedance of the NAAQS and are protective of human health and the environment.

The Applicant conducted a full NAAQS analysis for those pollutants above de minimis to account for cumulative effects by including an evaluation of all onproperty sources, applicable off-property sources, and representative monitored background concentrations. Results of the NAAQS analysis are presented below in Table 2. The total concentration was determined by adding the GLCmax to the appropriate background concentration. Background concentrations are obtained from ambient air monitors across the state and are added to the modeled concentration (both on-property and off-property sources) to account for sources not explicitly modeled. The ambient air monitors were selected to ensure that they are representative of the proposed site. The total concentration was then compared to the NAAQS to ensure that the concentration is below the standard. For any subsequent projects submitted pertaining to this or any other facility in the area, the air quality analysis (AQA) for that project will have to include the emissions authorized by this project, as well as other applicable off-property sources, if a full impacts analysis is required.

Table 2. Total Concentrations for PSD NSR NAAQS (Concentrations > De Minimis) ( $\mu g/m^3$ )

Pollutant	Averaging Time	GLCmax (µg/m³)	Background (µg/m³)	Total Conc. = [Background + GLCmax] (µg/m <sup>3</sup> )	Standard (µg/m³)
$PM_{2.5}$	24-hr	4.28*	17.51	21.79	35
PM <sub>2.5</sub>	Annual	0.67*	7.78	8.45	9
NO <sub>2</sub>	1-hr	164.33	See background discussion below	164.33	188

\*GLCmax represent the total predicted concentration associated with modeling the direct  $PM_{2.5}$  emissions and the contributions associated with secondary  $PM_{2.5}$  formation.

Background concentrations for NO<sub>2</sub> were obtained from the EPA AIRS monitor 483491051 at Corsicana Airport, Corsicana, Navarro County. For the 1-hr NO<sub>2</sub> NAAQS analysis, the applicant conducted the evaluation by combining NO<sub>2</sub> background concentrations with the predicted concentrations on a seasonal-hour of day basis for each modeled receptor.

The NAAQS analysis results are below the standard for each pollutant, should not cause or contribute to an exceedance of the NAAQS, and are protective of human health and the environment.

### Ozone Analysis

The applicant performed an  $O_3$  analysis as part of the PSD Air Quality Analysis (AQA). The applicant evaluated project emissions of  $O_3$  precursor emissions (NO<sub>x</sub> and VOC). For the project NO<sub>x</sub> and VOC emissions, the applicant provided an analysis based on a Tier 1 demonstration approach consistent with EPA's Guidances on Air Quality Models (GAQM), and the results are less than the De Minimis level as shown in Table 3 below.

Table 3. Modeling Results for Ozone PSD De Minimis Analysis in Parts per Billion (ppb)

Pollutant	Averaging Time	GLCmax (ppb)	De Minimis (ppb)
$O_3$	8-hr	0.989	1

### Effects Screening Levels

To evaluate potential impacts of non-criteria pollutants, a health effects analysis was performed. ESLs are specific guideline concentrations used in TCEQ's evaluation of certain non-criteria pollutants. These guidelines are derived by TCEQ's Toxicology Division and are based on a pollutant's potential to cause adverse health effects, odor nuisances, and effects on vegetation. Health-based ESLs are set below levels reported to produce adverse health effects, and are set to protect the general public, including sensitive subgroups such as children, the elderly, or people with existing respiratory conditions. TCEQ's Toxicology Division specifically considers the possibility of cumulative and aggregate

exposure when developing the ESL values that are used in air permitting, creating an additional margin of safety that accounts for potential cumulative and aggregate impacts. Adverse health or welfare effects are not expected to occur if the air concentration of a pollutant is below its respective ESL. If an air concentration of a pollutant is above the screening level, it is not necessarily indicative that an adverse effect will occur, but rather that further evaluation is warranted.

The Applicant conducted a health effects analysis using the Modeling and Effects Review Applicability (MERA) guidance.<sup>3</sup> The MERA is a tool to evaluate impacts of non-criteria pollutants. It is a step-by-step process, evaluated on a chemical species by chemical species basis, in which the potential health effects are evaluated against the ESL for the chemical species. The initial steps are simple and conservative, and as the review progresses through the process, the steps require more detail and result in a more refined (less conservative) analysis. If the contaminant meets the criteria of a step, the review of human health and welfare effects for that chemical species is complete and is said to "fall out" of the MERA process at that step because it is protective of human health and welfare. All pollutants satisfy the MERA criteria and therefore are not expected to cause adverse health effects, as shown in Table 4.

Pollutant & CAS#	Averaging Time	GLCmax (µg/m³)	ESL (μg/m³)	Modelling and Effects Review Applicability (MERA) Step in Which Pollutant Screened Out
Propane	1-hr	N/A	N/A	Stan 0 – simple asphyviate
74-98-6	Annual	N/A	N/A	step 0 - simple asphysiate
Propylene	1-hr	N/A	N/A	Sten () – simple asphyviate
115-07-1	Annual	N/A	N/A	Step 0 - Shipte asphysiate
n-Butane 106-97-8	1-hr	N/A	66,000	Step 2 – long-term ESL $\geq$ 10% of short-term ESL, short-term ESL is greater than 3,500 µg/m <sup>3</sup> and production emissions increase $\leq$ 0.4 lb/hr
	Annual	N/A	7100	Step 0 – long-term $ESL \ge 10\%$ of short-term $ESL$
n-Pentane 109-66-0	1-hr	N/A	59,000	Step 2 – long-term ESL $\geq$ 10% of short-term ESL, short-term ESL is greater than 3,500 µg/m <sup>3</sup> and production emissions increase $\leq$ 0.4 lb/hr
	Annual	N/A	7100	Step 0 – long-term $ESL \ge 10\%$ of short-term $ESL$
n-hexane 110-54-3	1-hr	0.23	5600	Step 3 - CI Cmay < 10% FSI
	Annual	< 0.01	200	Step 5 - Glemax < 10% ESL
Formaldehyde	1-hr	0.73	15	Step 3 – GLCmax < 10% ESL

Table 4. Health Effects Review - Minor NSR Project-Related Results

<sup>3</sup> See APDG 5874 guidance document.

Pollutant & CAS#	Averaging Time	GLCmax (µg/m <sup>3</sup> )	ESL (µg/m³)	Modelling and Effects Review Applicability (MERA) Step in Which Pollutant Screened Out
50-00-0	Annual	N/A	3.3	Step 0 - Long-term $ESL \ge 10\%$ of short-term $ESL$
Fuel oil No. 2	1-hr	556.53	1000	Step 7 – Sitewide modeling results
68476-30-2	Annual	0.06	100	are less than the ESL

### State Property Line Analysis (30 TAC Chapter 112)

Because this application has sulfur emissions, the Applicant conducted a state property line analysis to demonstrate compliance with TCEQ rules for net ground-level concentrations for sulfur dioxide (SO<sub>2</sub>), hydrogen sulfide (H<sub>2</sub>S), and sulfuric acid (H<sub>2</sub>SO<sub>4</sub>), as applicable. This analysis demonstrated that resulting air concentrations will not exceed the applicable state standard, as shown in Table 5 below.

Pollutant	Averaging Time	GLCmax (µg/m³)	De Minimis (µg/m³)
$SO_2$	1-hr	1.87	20.42
$H_2SO_4$	1-hr	0.23	1
$H_2SO_4$	24-hr	0.04	0.3

Table 5. Project-Related Modeling Results for State Property Line

# Greenhouse Gases

EPA has stated that unlike the criteria pollutants for which EPA has historically issued PSD permits, there is no NAAQS or PSD increment for GHGs. The EPA Administrator has recognized that human-induced climate change has the potential to be far-reaching and multi-dimensional.<sup>4</sup> Climate change modeling and evaluations of risks and impacts are typically conducted for changes in emissions that are orders of magnitude larger than the emissions from individual projects that might be analyzed in permit reviews. Quantifying the exact impacts attributable to a specific GHG source obtaining a permit in specific places and points would not be possible with current climate change modeling.<sup>5</sup> Thus, EPA has concluded it would not be meaningful to evaluate impacts of GHG emissions on a local community in the context of a single permit.

TCEQ has determined that an air quality analysis for GHG emissions would provide no meaningful data and has not required the Applicant to perform one. As stated in the preamble to TCEQ's adoption of the GHG PSD program, the impacts review for individual air contaminants will continue to be addressed, as

<sup>4</sup> *See* Endangerment and Cause or Contribute Findings for Greenhouse Gases Under Section 202(a) of the Clean Air Act, 75 Fed. Reg. 66496, 66497 (Dec. 15, 2009).

<sup>5</sup> See EPA PSD and Title V Permitting Guidance for GHGs, March 2011 at 48.

applicable, in the state's traditional minor and major NSR permits program per 30 TAC Chapter 116 and 30 Tex. Reg. 2629, 2904 (April 11, 2014).

With respect to climate change effects potentially impacted by the proposed GHG emissions from the project, the Applicant demonstrated that they will meet best available control technology (BACT) for GHGs, which is required to be evaluated as part of the GHG major PSD permitting action – see Response 4 for more details on BACT for GHGs.

Additionally, there are no emissions of lead or mercury from natural gas-fired turbines. See response 18 for more information on emission calculations.

In summary, based on the Executive Director's staff review, it is not expected that existing health conditions will worsen, or that there will be adverse health effects on the general public, sensitive subgroups, or the public welfare and the environment as a result of proposed emission rates associated with this project.

#### **Comment 2: Environmental Concerns**

Commenters voiced concern about the effect of the proposed project on surrounding pets, livestock, wildlife (including endangered species), and the environment. Commenters voiced concern that emissions from the facility are toxic to animals. Commenters expressed concern that lead and mercury air emissions from the proposed facility would affect water quality and aquatic life.

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**Response 2:** The secondary NAAQS are those the EPA Administrator determines are necessary to protect public welfare and the environment, including animals, crops, vegetation, visibility, and structures, from any known or anticipated adverse effects associated with the presence of a contaminant in the ambient air. Because the emissions from this facility should not cause an exceedance of the NAAQS, air emissions from this facility are not expected to adversely impact land, livestock, wildlife, crops, or visibility, nor should emissions interfere with the use and enjoyment of surrounding land or water. Please see Response 1 for an evaluation of this project's impacts in relation to the NAAQS. In addition, 30 TAC § 101.4 prohibits the discharge of contaminants which may be injurious to, or adversely affect, animal life, and the applicant must follow this rule to demonstrate compliance with the proposed permit.

Compliance with rules and regulations regarding endangered species is handled at the state level by the Texas Parks and Wildlife Department and at the federal level by the United States Fish and Wildlife Service. It is incumbent upon an applicant to request and acquire any additional authorizations that may be required under state or federal law. However, if operated in accordance with the requirements of the permit, adverse impacts from the proposed plant are not expected.

Additionally, there are no emissions of lead or mercury from natural gas-fired turbines. See response 18 for more information on emission calculations.

### **Comment 3: Potential Effects on Area's Nonattainment Designation**

Commenters voiced concern that the emissions from this project could cause the county to be designated as nonattainment. Commenters stated concerns that the  $PM_{2.5}$  increment consumed suggests  $PM_{2.5}$  nonattainment is likely, and the permit should therefore not be granted. Commenters also expressed concern that Hood County is a nonattainment area.

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**Response 3:** Hood County is currently designated as being in attainment or unclassifiable for all criteria pollutants. An impacts analysis was conducted for this project and demonstrates that the proposed facility will not cause or

contribute to an exceedance of the NAAQS; therefore, the project is not expected to cause the county to be designated as nonattainment.

On February 7, 2024, EPA promulgated a revised standard for the  $PM_{2.5}$  NAAQS. EPA strengthened the primary annual  $PM_{2.5}$  standard from 12.0 µg/m<sup>3</sup> to 9.0 µg/m<sup>3</sup>. Within one year of setting a new or revised NAAQS for a criteria pollutant, states submit recommendations to EPA as to whether or not an area is attaining the standard. Counties with regulatory monitors measuring under the 2024 primary annual  $PM_{2.5}$  NAAQS would have the potential designation of "attainment", while counties that are unlikely to generate a valid design value based on available data would have the potential designation of "unclassifiable". All counties that do not have a regulatory monitor would have the potential designation of attainment/unclassifiable, consistent with historical EPA designation practices. State designations are due to EPA by February 7, 2025, and EPA's final designations are expected in early 2026.

The purpose of the Prevention of Significant Deterioration (PSD) air quality analysis (AQA) conducted for this permit application is to demonstrate that new emissions emitted from proposed facilities (i.e., emission units), in conjunction with other applicable emissions increases and decreases from existing facilities, will not cause or contribute to a violation of any applicable NAAQS or PSD increment.

The PSD increment is the maximum allowable increase in concentration that is allowed to occur above a baseline concentration for a pollutant. The baseline concentration is defined for each pollutant and, in general, is the ambient concentration level that existed at the time that the first complete PSD application affecting the area was submitted. The baseline concentration is the reference point for determining air quality deterioration in an area. The baseline concentration level is not based on ambient monitoring because ambient measurements reflect emissions from all sources, including those that should be excluded from the measurements. Since PSD increment consumption or expansion is associated with a specific date, it cannot be determined from monitoring data and should be evaluated through air dispersion modeling.

The PM<sub>2.5</sub> PSD increment analysis conducted for this application evaluated the proposed emissions, emissions from existing increment consuming facilities at the application site, and emissions from nearby off-property increment consuming sources. The results for the increment analyses are presented below in Table 7 and demonstrate the proposed emissions will not cause or contribute to a PSD increment violation.

Pollutant	Averaging Time	GLCmax (µg/m³)	Increment (μg/m³)
$\mathrm{PM}_{2.5}$	24-hr	6.63*	9
PM <sub>2.5</sub>	Annual	0.71*	4

Table 7. Results for PSD Increment Analysis

\*GLCmax represent the total predicted concentration associated with modeling the direct  $PM_{2.5}$  emissions and the contributions associated with secondary  $PM_{2.5}$  formation.

In addition to the PSD increment analysis, the PSD AQA included a PSD NAAQS analysis as described in Response 1. The purpose of the NAAQS analysis is to demonstrate that the proposed emissions will not cause or contribute to a violation of the NAAQS. The results for the PSD NAAQS analyses are presented in Response 1 and demonstrate the proposed emissions will not cause or contribute to a PSD NAAQS violation. Therefore, the project is not expected to cause the county to be designated as nonattainment for PM<sub>2.5</sub>. See Response 1 for more information on the Air Quality Analysis conducted.

### Comment 4: Best Available Control Technology (BACT)

Commenters questioned the control technology proposed in the application and asked if the emissions were being filtered or scrubbed. One commenter questioned the lower efficiency (and higher pollutant emission rates) of simplecycle turbines when compared to combined-cycle turbines

(Donna Adair, Robert Adair, Mary Allard, Ronnie Allard, Andrea M. Barber, David Blankenship, Lisa Blankenship, Curtis Brooks, A Brooks, Marie Brooks, Christian Brooks, Virginia Browning, Nick Browning, Kim Burton, John Campbell, Ricky Carmack, Brian Caruthers, Bruce Chase, Lisa Clement, Shenice Copenhaver, Keisha Doss, Joe Drew, Tommy Engle, Maci English, William Faraizl, Mark Franco, Lynnsey Goller, Kenneth Hall, Juanita Hall, Roberta Hannula, Roland Hannula, John W. Highsmith, Douglas Houg, James Jarratt, Greg Johnson, Denna Jones, Margaret Killion, Robert Killion, Timothy J. Kurcz, Marcia L. Kurcz, Daniel Scott Lakey, Deanna Lakey, Geraldine Lathers, Chuck Licata, Randall J. Love. Ronald Massingill, Mark Mathews, Toby Mitchell, Frank Moffitt, Brett Niebes, Karen Pearson, Brad Peden, Courtney Pedroza, Jonathan Pedroza, Steven Potts, Barbara Potts, Beverley A. Potts, Larry M. Potts, David T. Raffa, Tanner Randall, Amy Rawle, Wesley Rawle, Olean Roberts, Daniel R. Rohde, Nancy Rohde, Gwyneth Rohde, Martin Ruback, Chris Rubel, William Seider, Jeff Seider, Leeann Seider, Briana Seider, Cheryl Shadden, Amanda Sims, Hunter Sims, Bob Slater, Suzanne Sloan, Lindsey Stewart, Zachary Q. Stewart, Robert M. Taber, Richard Tanner, Santiago Torres, Rae Waldrod, Corey Webster, Jacob Webster, Thomas Weeks, Peter Wolf, Shannon Wolf, Annabel Wullaert)

**Response 4:** Filters and scrubbers are not the appropriate control technology for natural gas-fired turbines. The Applicant has represented in the permit application that BACT will be used for the proposed new sources. During the course of the technical review of a permit application, the permit reviewer evaluates air pollution control requirements and confirms that the applicant has proposed the appropriate air pollution controls and properly determined offsite impacts for the project facilities and associated sources. The Applicant's air pollution control review, along with the permit reviewer's air pollution control evaluation and final recommendation, provide a record that demonstrates that the operation of a proposed facility or related source will not cause or

contribute to a condition of air pollution and will comply with all applicable federal regulations and state rules, as well as with the intent of the TCAA.

The TCAA and TCEQ rules require an evaluation of air quality permit applications to determine whether adverse effects to public health, general welfare, or physical property are expected to result from a facility's proposed emissions. As part of the evaluation of applications for new or amended permits, the permit reviewer audits all sources of air contaminants from the proposed project and assures that the proposed project will be using the BACT applicable for the sources and types of contaminants emitted. BACT is based upon control measures that are designed to minimize the level of emissions from specific sources at a facility. Applying BACT results in requiring technology that best controls air emissions with consideration given to the technical practicability and economic reasonableness of reducing or eliminating emissions.<sup>6</sup> BACT may be numerical limitations, the use of an add-on control technology, design considerations, the implementation of work practices, or operational limitations.

TCEQ BACT evaluation is conducted using a "tiered" analysis approach. The evaluation begins at the first tier and, only if necessary, continues sequentially through subsequent tiers, as determined by the evaluation process described below. In each tier, BACT is evaluated on a case-by-case basis for technical practicability and economic reasonableness. The three tiers are:

- **Tier I:** Emission reduction performance levels accepted as BACT in recent permit reviews for the same process and/or industry continue to be acceptable.
- **Tier II:** Tier II BACT evaluation involves consideration of controls that have been accepted as BACT in recent permits for similar air emission streams in a different process or industry. For example, an applicant may propose to control VOC emissions in one industry using technology already in use in another industry. A Tier II evaluation includes issues relating to stream comparison and possible differences in overall performance of a particular emission reduction option. In addition, the Tier II evaluation considers technical differences between the processes or industries in question. To demonstrate technical practicability, detailed technical analysis may be required to assess the cross-applicability of emission reduction options. In Tier II, economic reasonableness is established by historical and current practice.
- **Tier III:** A Tier III BACT evaluation is a detailed technical and quantitative economic analysis of all emission reduction options available for the process under review and is similar to EPA's top-down approach. Technical practicability is established through demonstrated success of an emission reduction option based on previous use, and/or engineering evaluation of a new technology. Economic reasonableness is determined solely by the cost-effectiveness of controlling emissions (dollars per ton of

<sup>6</sup> See TCAA § 382.0518; 30 TAC § 116.111.

pollutant reduced) and does not consider the effect of emission reduction costs on corporate economics.

The general permitting guidance that includes BACT analysis can be found at: <u>https://www.tceq.texas.gov/assets/public/permitting/air/Guidance/NewSource</u> <u>Review/airpoll\_guidance.pdf</u>.

The contaminants authorized by this proposed facility will be carbon monoxide, nitrogen oxides,  $PM_{10}$ ,  $PM_{2.5}$ , hazardous air pollutants, organic compounds, sulfur dioxide, sulfur hexafluoride, and sulfuric acid mist. The proposed facility will also emit greenhouse gases. The permit reviewer evaluated the proposed BACT and confirmed it to be acceptable. The primary control measures proposed for this plant are identified as follows:

Source Name	Emission Point Number (EPN)	Best Available Control Technology Description
Simple- Cycle Combustion Turbine Generators	E-SCT7 through E-SCT14	NO <sub>x</sub> : Dry low NO <sub>x</sub> (DLN) combustors will limit NO <sub>x</sub> emissions to 9.0 parts per million by volume, dry (ppmvd) corrected to 15 % O <sub>2</sub> on a rolling three- hour average. The RACT/BACT/LAER <sup>7</sup> Clearinghouse (RBLC) search returned 50 projects for which natural gas-fired simple-cycle units were permitted between 2012 and 2021, with reported NO <sub>x</sub> emission limits that match Applicant's proposal therefore, BACT is satisfied. CO: Good combustion practices, and DLNs will limit CO to a level of 25.0 ppmvd on a rolling 3-hour average corrected to 15% O <sub>2</sub> . The proposed controls and emission limits are consistent with the expectations for control of CO for natural gas- fired combined cycle turbines and the result of the RBLC search returned reported CO emission limit; therefore, BACT is satisfied. VOC: Good combustion practices, DLNs, and an oxidation catalyst will limit VOC emissions to 2.0 ppmvd for both natural gas and diesel corrected to 15% O <sub>2</sub> on rolling three-hour average. The

<sup>7 &</sup>quot;RACT", "BACT", and "LAER" are acronyms for "Reasonably Available Control Technology", "Best Available Control Technology", and "Lowest Achievable Emission Rate", respectively.

	proposed controls and emission limits represent BACT.
	PM/PM <sub>10</sub> /PM <sub>2.5</sub> :
	PM/PM <sub>10</sub> /PM <sub>2.5</sub> is emitted from combustion processes due to the presence of ash and other inorganic constituents contained in the fuel, particulate matter in the inlet air, and incomplete combustion of the organic constituents in the fuel. PM/PM <sub>10</sub> /PM <sub>2.5</sub> emissions are due to incomplete combustion and are anticipated to be relatively low. A search of the RBLC and TCEQ Gas Turbine List shows that no add-on controls are required for natural gas-fired combustion turbines to control PM/PM <sub>10</sub> /PM <sub>2.5</sub> . Therefore, the use of good combustion practices to minimize emissions of particulate matter and the use of natural gas is BACT for PM/PM <sub>10</sub> /PM <sub>2.5</sub> .
	Sulfur Compounds:
	Emissions of $SO_2$ occurs as a result of oxidation of sulfur in the natural gas fired in the combustion turbines, with the majority of the sulfur converted to $SO_2$ . A portion of the $SO_2$ will be further converted to $H_2SO_4$ , with a conversion contribution due to the action of the SCR. The formation of $SO_2$ and $H_2SO_4$ will be minimized by using pipeline- quality natural gas with a sulfur content not exceeding 1.0 grains sulfur per 100 standard cubic feet on an hourly/annual basis. Therefore, the proposed fuel and sulfur limits represented are BACT for $SO_2$ and $H_2SO_4$ .
	Greenhouses Gases (GHG):
	Simple cycle units serve a different purpose that the combined cycle turbine and their ability to quickly ramp up and down make them ideal for "peaking", quick ramping for use during periods with the highest electricity demand. Wolf Hollow is proposing a limit per turbine of 1,482 pounds of CO <sub>2</sub> equivalent per megawatt hour (lb CO <sub>2</sub> e/MWh) and an operational limitation of 13,076,000 million British thermal units per year (MMBtu/yr) (all turbines combined) firing on natural gas. A search of the RBLC and TCEQ Gas Turbine List for facilities permitted between January 2012 and

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Source Name	Emission Point Number (EPN)	Best Available Control Technology Description
		2021 show that the $CO_2$ emission limits ranged from 1,276 to 1,707 lb/MWh. The proposed emission limit and operational limitation represents BACT.
		Maintenance, Startup, and Shutdown (MSS):
		Operation of the combustion turbines will result in emissions from startup and shutdown. The combustion turbines will be started up and shut down in a manner that minimizes the emissions during these events. The duration of each startup and shutdown is limited to 60 minutes. BACT will be achieved by minimizing the duration of the startup and shutdown events (consistent with market demands), engaging the pollution control equipment as soon as practicable (based on vendor recommendations and guarantees), and meeting the emissions limitations on the MAERT.
Turbine lube oil vent	ST-SCTLOV7 through ST-SCTLOV14	VOC: The heating of recirculating lubrication oil in the gas turbine generates oil vapor and oil condensate droplets in the oil reservoir compartments. The venting of turbine lubrication oil is a minor source of VOC and PM/PM <sub>10</sub> /PM <sub>2.5</sub> emissions, represented as <0.01 lb/hr and 0.01 tons per year (tpy) for VOC and <0.01 lb/hr and 0.01 tpy for PM/PM <sub>10</sub> /PM <sub>2.5</sub> . These emissions will be controlled with oil mist eliminators, which satisfies BACT.
		PM/PM <sub>10</sub> /PM <sub>2.5</sub> TCEQ does not provide Tier 1 BACT guidelines for lube oil vent emissions. There is no process code associated with lube oil vents that can be searched in the RBLC. However, a search by the permit reviewer for simple cycle energy projects in the RBLC and a review of other available permits identified a recently permitted facility with lube oil vent listed as a process source. These recent RBLC determinations identify mist eliminators as the

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Source Name	Emission Point Number (EPN)	Best Available Control Technology Description
		control method. The proposed use of mist eliminators satisfies BACT.
Diesel-Fired Generator	E-GEN3, E-GEN4, E-GEN5	BACT will be achieved through firing diesel fuel containing no more than 15 parts per million sulfur by weight, proper operation, maintenance, and limiting annual operation to 100 hours per year for each engine. The requirement of NSPS Subpart IIII does not apply since the engines were constructed prior to 07/11/2005. However, the engines will meet the Tier 1 Exhaust Standard for Generator Sets, 40 CFR 1039, Appendix I, and have a non-resettable runtime meter.
Diesel Storage Tanks	E-DSLTK3, E-DSLTK4, E-DSLTK	BACT for fixed roof storage tanks with a capacity less than 25,000 gallons or containing a material with a true vapor pressure less than 0.5 psia is met by using submerged fill and uninsulated exterior surfaces exposed to the sun shall be white or aluminum. The diesel tanks have a max storage capacity of 1,900 gallons and will be storing ultra- low sulfur diesel (0.01 psia).
Fugitives	E-NGFUG-P3	Includes VOC which originate from the natural gas fuel lines. The uncontrolled VOC emissions are less than 10 tons per year and due to the negligible amount of GHG emissions from process fugitives, the only available control, implementation of a Leak Detection and Repair Program (LDAR), is not cost effective and would result in no significant reduction in overall project GHG emissions. Periodic audio/visual/olfactory inspections will be performed for natural gas. Any leaks will be repaired when detected. Therefore, BACT is satisfied.
MSS Fugitives	E-TRBMSSP3	Emissions associated with routine maintenance activities undertaken to ensure the proper operability of equipment. Good work practices and limiting the frequency and duration of maintenance activities represents BACT.
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Source Name	Emission Point Number (EPN)	Best Available Control Technology Description
SF <sub>6</sub> Electrical Equipment	E-SF6FUG	The use of circuit breakers with totally enclosed insulation systems equipped with a low-pressure alarm/lockout is BACT.

Further, as long as the chosen technology meets BACT requirements, the applicant has the ability to decide the functional need of the unit and the technology used. TCEQ evaluates the emissions from the applicant's stated construction of the plant. Applicants are bound to the representations made in the permit application. Individuals are encouraged to report any concerns about suspected noncompliance with terms of any permit or other environmental regulation by contacting the TCEQ Dallas/Fort Worth Regional Office at 817-588-5800 or by calling the 24-hour toll-free Environmental Complaints Hotline at 1-888-777-3186. If the facility is found to be out of compliance with the terms and conditions of the permit, it may be subject to possible enforcement action.

For this site, Applicant represented that simple-cycle turbines would be used at the proposed plant, and the permit review and modeling analyses were conducted based on these representations. At the conclusion of the permit review, TCEQ concluded that the proposed BACT was acceptable, and that there would not be expected adverse effects to public health, general welfare, or physical property as a result from the proposed emissions from the site's facilities.

With regards to turbine efficiency, the engineering design and market needs dictate the type of turbine design and installation. The proposed turbines are being permitted for peaking service, which affects the design as simple cycle units. TCEQ does not have the ability to redefine the source, provided the application demonstrates that it meets BACT, impacts, and all applicable rules. It has also been EPA's long-standing policy that the BACT review process is not to be used to require an applicant to fundamentally redefine a proposed source.<sup>8</sup> Accordingly, the alternative proposals redefine the source, and the Applicant's proposed BACT is acceptable.

# **Comment 5: Monitor for Air Quality Analysis**

Commenters questioned the air monitor used to evaluate baseline emissions. Commenters requested that local monitors be used rather than monitors from outside the impacted area.

<sup>8</sup> EPA New Source Review Workshop Manual, p. B13 (October 1990); *In the Matter of: Pennsauken Cnty., New Jersey, Res. Recovery Facility*, 2 E.A.D. 667 (E.P.A. Nov. 10, 1988), 1988 WL 249035 \*4; *In Re Prairie State Generating Company*, 13 E.A.B. 1, 21 (2006)("We ... conclude the statute [FCAA] contemplates that the permit issuer looks to how the permit applicant defines the proposed facility's purpose or basic design in its application." at 22); *Sierra Club v. EPA*, 499 F.3d 653, 655-56 (7th Cir. 2007).

(Donna Adair, Robert Adair, Mary Allard, Ronnie Allard, Andrea M. Barber, David Blankenship, Lisa Blankenship, A Brooks, Christian Brooks, Curtis Brooks, Marie Brooks, Virginia Browning, Nick Browning, Kim Burton, John Campbell, Ricky Carmack, Brian Caruthers, Bruce Chase, Lisa Clement, Shenice Copenhaver, Keisha Doss, Joe Drew, Tommy Engle, Maci English, William Faraizl, Mark Franco, Lynnsey Goller, Kenneth Hall, Juanita Hall, Roberta Hannula, Roland Hannula, John W. Highsmith, Douglas Houg, James Jarratt, Greg Johnson, Denna Jones, Margaret Killion, Robert Killion, Timothy J. Kurcz, Marcia L. Kurcz, Daniel Scott Lakey, Deanna Lakey, Geraldine Lathers, Chuck Licata, Randall J. Love, Ronald Massingill, Mark Mathews, Toby Mitchell, Frank Moffitt, Brett Niebes, Karen Pearson, Brad Peden, Courtney Pedroza, Jonathan Pedroza, Steven Potts, Barbara Potts, Beverley A. Potts, Larry M. Potts, David T. Raffa, Tanner Randall, Amy Rawle, Wesley Rawle, Olean Roberts, Daniel R. Rohde, Nancy Rohde, Gwyneth Rohde, Martin Ruback, Chris Rubel, William Seider, Jeff Seider, Leeann Seider, Briana Seider, Cheryl Shadden, Amanda Sims, Hunter Sims, Bob Slater, Suzanne Sloan, Lindsey Stewart, Zachary Q. Stewart, Robert M. Taber, Richard Tanner, Santiago Torres, Rae Waldrod, Corev Webster, Jacob Webster, Thomas Weeks, Peter Wolf, Shannon Wolf, Annabel Wullaert)

**Response 5:** Background concentrations in the AQA are used to account for ambient concentrations from other sources in the area around the plant. The Applicant selected the ambient monitor data from EPA AIRS monitor 481390016, located at 2725 Old Fort Worth Rd., Midlothian, Ellis County, for PM<sub>25</sub>; EPA AIRS monitor 482210001, located at 200 N Gordon St., Granbury, Hood County, for ozone; and EPA AIRS monitor 483491051 at Corsicana Airport, Corsicana, Navarro County, for NO<sub>2</sub>, that were conservative and consistent with TCEO guidance. For each monitor, the Applicant conducted a quantitative analysis of pollutant emissions in the vicinity of the monitor site relative to the proposed project site in a 10-kilometer area. The reported pollutant emissions in the vicinity of the selected monitor sites were greater than the reported pollutant emissions in the vicinity of the proposed project site. Thus, background concentrations from the selected monitors are conservative because background concentrations in the vicinity of the selective monitors are expected to be higher than background concentrations in the vicinity of the proposed project.

In addition to the quantitative analysis in the vicinity of the monitor site, the Applicant compared county-wide emission and population in Hood County and monitors located outside of Hood County and the project site. Hood County has an ozone monitor, so the additional analysis of county emissions and population comparison is unnecessary. Because the chosen ozone monitor in Hood County is in sufficient proximity to the proposed site, it was reasonable for the Applicant to use this ozone monitor and the quantitative assessment for its analysis. See Response 1 for more information on the Air Quality Analysis conducted.

# <u>Comment 6: Modeling – Dispersion Modeling/Open Sources/Conservative</u> <u>Representation/Receptors</u>

Commenters questioned the dispersion modeling conducted for the proposed project and questioned whether it is adequate for evaluating potential impacts on public health. Commenters asked if the modeling software is open sources. Commenters questioned the receptors and the conservative representation used for the modeling for the proposed project.

(Jim Brown, Ward Dunn, Juan Rincon Gonzalez, Juan Rincon, Michael L. Tabor, James Wall, Andrew J. Wolford)

# **Response 6:**

#### **Dispersion Modeling**

For this specific permit application, the applicant used the AERMOD modeling software, EPA's preferred air dispersion model for PSD NSR permitting. The likelihood of whether adverse health effects caused by emissions from the facility could occur in members of the general public, including sensitive subgroups such as children, the elderly, or people with existing respiratory conditions, was determined by comparing the facility's model predicted concentrations to the relevant state and federal standards and ESLs. TCEQ staff used modeling results to verify that predicted ground-level concentrations from the proposed facility are not likely to adversely impact public health and welfare. The overall evaluation process provides a conservative prediction that is protective of public health. The modeling predictions was determined to be acceptable. See Response 1 for more information on the air quality analysis.

# **Open Sources**

The AERMOD Modeling System is a steady-state plume model that incorporates air dispersion based on planetary boundary layer turbulence structure and scaling concepts, including treatment of both surface and elevated sources, and both simple and complex terrain. The current version of the AERMOD model was developed within the Microsoft Windows operating system (Windows) and has been designed to run on Windows PCs within a Command-prompt using command-line arguments to initiate a model run. Additional guidance and model executables can be obtained from the EPA

(https://www.epa.gov/scram/air-quality-dispersion-modeling-preferred-and-recommended-models).

# **Receptors/Conservative Representation**

For modeling, receptors are locations where the model calculates a predicted concentration where the public could be exposed to an air contaminant in the ambient air. Ambient air for minor NSR modeling starts at the applicant's property line. For PSD modeling, ambient air starts at the applicant's fence line or other physical barrier to public access. A receptor grid is designed with sufficient spatial coverage and density to determine the maximum predicted ground-level concentration in an off-property area or an area not controlled by the applicant.

# Comment 7: Public Notice - Sign Posting

Commenters questioned if the sign posting requirements were met. Commenters further stated that signs were not posted near the Wolf Hollow plant.

(John W. Highsmith and Adrian Donald Shelley)

**Response 7:** Title 30 TAC § 39.604 requires that signs be placed at the site of the existing or proposed facility. The sign(s) must state that an air permit application has been filed, the proposed permit number, and how the public may contact the commission for further information.

Each sign placed at the site must be located within ten feet of every property line paralleling a public highway, street, or road. Signs must also be visible from the street, meet lettering and size requirements, and be spaced at not more than 1,500-foot intervals. A minimum of one sign, but no more than three signs, are required along any property line paralleling a public highway, street, or road. Finally, in cases which notice is required to be published in an alternative language, the applicant must also post signs in the applicable alternative language.

The Applicant provided verification to the Office of the Chief Clerk in accordance with 30 TAC § 39.605 that signs were posted at the proposed site in accordance with 30 TAC § 39.604.

#### **Comment 8: Access to Permit Documents**

Commenters stated that they did not have access to and want to review the permit documents. Commenters are concerned that confidentiality agreements between the applicant and TCEQ may prevent the public from knowing complete details and risks associated with the proposed air permit, thus, creating an unnecessary adversarial relationship with the public.

(Donna Adair, Robert Adair, Ronnie Allard, Mary Allard, Andrea M. Barber, David Blankenship, Lisa Blankenship, A. Brooks, Christian Brooks, Curtis Brooks, Marie Brooks, Virginia Browning, Nick Browning, Kim Burton, Ricky Carmack, Bruce Chase, Shenice Copenhaver, Keisha Doss, Tommy Engle, Maci English, William Faraizl, Lynnsey Goller, Juanita Hall, Kenneth Hall, Roberta Hannula, Roland Hannula, Tim Harris, John W. Highsmith, Cynthia Marie Highsmith, Douglas Houg, Greg Johnson, Denna Jones, Janet Keel, Seth Keel, Margaret Killion, Robert Killion, Marcia L. Kurcz, Timothy J. Kurcz, Deanna Lakey, Daniel Scott Lakey, Geraldine Lathers, Randall J. Love, Mark Mathews, Toby Mitchell, Frank Moffitt, Brett Niebes, Karen Pearson, Brad Peden, Jonathan Pedroza, Courtney Pedroza, Steven Potts, Beverley A. Potts, Barbara Potts, Larry M. Potts, David T. Raffa, Tanner Randall, Amy Rawle, Wesley Rawle, Olean Roberts, Daniel R. Rohde, Nancy Rohde, Gwyneth Rohde, Martin Ruback, Chris Rubel, Jeff Seider, William Seider, Leeann Seider, Briana Seider, Cheryl Shadden, Amanda Sims, Hunter Sims, Bob Slater, Suzanne Sloan, Zachary O. Stewart, Lindsey Stewart, Richard Tanner, Santiago Torres, Rae Waldrod, Joseph Webber, Corey Webster, Jacob Webster, Thomas Weeks, Peter Wolf, Shannon Wolf, Andrew J. Wolford, Annabel Wullaert)

**Response 8:** Title 30 TAC § 39.405 requires the Applicant to provide copies of the application and the Executive Director's preliminary decision at a public place in the county in which the facility is located or proposed to be located. TCEQ rules also require the public have an opportunity to review and copy these materials. In addition, the application, including any subsequent revisions to the application, must be available for review for the duration of the comment period. The Applicant represented that the application was made available at the Hood County Library, 222 North Travis Street, Granbury, Hood County, Texas. Additionally, a copy of the application was available at TCEQ Dallas/Fort Worth Regional Office, and TCEQ Central Office. The technically complete application and all associated permit application documents are also available on TCEQ website at the following link:

https://www.tceq.texas.gov/assets/public/permitting/air/reports/applications/ nsr-pending-permits.html#NSR%20Case-by-Case%20Air%20Permits-N

#### **Comment 9: Quality of Life/Aesthetics/Property Values**

Commenters voiced concern about the effect of the proposed project on their quality of life, on the aesthetics of the area, and on their property values due to increased pollution, industrialization, and loss of wildlife and vegetation.

(Donna Adair, Robert Adair, Ronnie Allard, Mary Allard, Kevin Andrews, Andrea M Barber, Mark Beatty, James Bell, David Blankenship, Lisa Blankensip, Joe Boles, Christine Brooking, A. Brooks, Christian Brooks, Marie Brooks, Curtis Brooks, Monica Brown, Virginia Browning, Nick Browning, Richard Brunning, Representative Dewayne Burns, Kim Burton, Celine Busnelli, John Campbell, Rodrigo G. Cantu, Ricky Carmack, Brian Caruthers, Bruce Chase, Lisa Clement, Shenice Copenhaver, Travis Copenhaver, Mandy Deroche, Keisha Doss, Wyveda Dowdy, Joe Drew, Kay Dykes, Tom Dykes, Dave Eagle, Tommy Engle, Maci English, William Faraizl, Gertrisha Farmer, Mark Franco, Lynnsey Goller, Michael Graft, Melanie Graft, Holly Haefele, Juanita Hall, Kenneth Hall, Roland Hannula, Roberta Hannula, Tim Harris, Ted Hayes, Linda Hayes, Brent Hayes, Jill Henriksen, Helen Hensel, John W Highsmith, Cynthia Marie Highsmith, Paul Holliday, Rhonda Holliday, Douglas Houg, James Jarratt, Greg Johnson, Denna Jones, John Joslin, Daphne D. Kanas, Janet Keel, Seth Keel, Margaret Killion, Robert Killion, Marcia L Kurcz, Timothy J Kurcz, Daniel Scott Lakey, Deanna Lakey, Randall D. Larson, Patricia Larson, Geraldine Lathers, Christine C. Leftwich, Chuck Licata, Ron L. Liddell, Randall J. Love, Janet M. Lowery, Ronald Massingill, Mark Mathews, Barbara Meuter, Gary Miller, Kathy Miller, Toby Mitchell, Frank Moffitt, William Nichols, Liana Oechsle, Karen Pearson, Brad Peden, Jonathan Pedroza, Courtney Pedroza, Larry M. Potts, Steven Potts, Barbara Potts, Beverley A Potts, David T. Raffa, C. R. Rains, Christy Rains, Tanner Randall, Wesley Rawle, Amy Rawle, Olean Roberts, Gina Rogers, Mark Rogers, Nancy Rohde, Daniel R. Rohde, Gwyneth Rohde, Eva Rover, Martin Ruback, Chris Rubel, Nannette Samuelson, Jacqulyne Cleo Sawicky, Briana Seider, William Seider, Jeff Seider, Leeann Seider, Cheryl Shadden, Sheri Shaw, Adrian Donald Shelley, Amanda Sims, Hunter Sims, Suzanne Sloan, Nikki Sopchak, Alison Steele, Lindsey Stewart, Zachary O. Stewart, Robert M. Taber, Richard Tanner, Melanie R. Taylor, Timothy Taylor, Kim Tibljas, Edward J. Tibljas, Audrie Tibljas,

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Santiago Torres, Rae Waldrod, Joseph Webber, Jacob Webster, Corey Webster, Tom Weeks, Thomas Weeks, Veronica Welch, Van Austin Williams, Jack Wilson, Mary Wimberley, Walter Wimberley, Jimmy Wimberley, Shannon Wolf, Peter Wolf, Annabel Wullaert)

**Response 9:** TCEQ does not have the authority to consider potential effects from plant location, aesthetics, zoning and land use issues, or effects on property values when determining whether to approve or deny any air authorization.

#### **Comment 10: Noise and Light Pollution**

Commenters expressed concern regarding noise and light pollution from the proposed project disturbing daily and nighttime activities, such as work, sleep, time with their families, outdoor activities, as well as causing unnecessary stress to pets, livestock, and wildlife.

(Donna Adair, Robert Adair, Mary Allard, Ronnie Allard, Andrea M. Barber, Mark Beatty, James Bell, David Blankenship, Lisa Blankensip, Christine Brooking, A. Brooks, Curtis Brooks, Christian Brooks, Marie Brooks, Monica Brown, Nick Browning, Virginia Browning, Kim Burton, Celine Busnelli, Rodrigo G Cantu, Ricky Carmack, Bruce Chase, Shenice Copenhaver, Mandy Deroche, Keisha Doss, Tommy Engle, Maci English, William Faraizl, Lynnsey Goller, Holly Haefele, Kenneth Hall, Juanita Hall, Roberta Hannula, Roland Hannula, Tim Harris, Jill Henriksen, John W. Highsmith, Cynthia Marie Highsmith, Douglas Houg, Greg Johnson, Denna Jones, John Joslin, Daphne D Kanas, Robert Killion, Margaret Killion, Marcia L. Kurcz, Timothy J. Kurcz, Daniel Scott Lakey, Deanna Lakey, Randall D. Larson, Patricia Larson, Geraldine Lathers, Ron L. Liddell, Randall J. Love, Mark Mathews, Gary Miller, Kathy Miller, Toby Mitchell, Frank Moffitt, Brett Niebes, Karen Pearson, Brad Peden, Jonathan Pedroza, Courtney Pedroza, Steven Potts, Larry M. Potts, Barbara Potts, Beverley A. Potts, David T. Raffa, Tanner Randall, Wesley Rawle, Amy Rawle, Olean Roberts, Gwyneth Rohde, Nancy Rohde, Daniel R. Rohde, Martin Ruback, Chris Rubel, Karen J. Russell, Chesney Sampson, Jacqulyne Cleo Sawicky, Jeff Seider, Briana Seider, Leeann Seider, William Seider, Chervl Shadden, Amanda Sims, Hunter Sims, Bob Slater, Suzanne Sloan, Lindsey Stewart, Zachary Q. Stewart, Robert M. Taber, Michael L. Tabor, Suzy Tabor, Richard Tanner, Santiago Torres, Rae Waldrod, Joseph Webber, Jacob Webster, Corey Webster, Thomas Weeks, Tom Weeks, Peter Wolf, Shannon Wolf, Annabel Wullaert)

Response 10: TCEQ does not have jurisdiction to consider noise or light pollution from a proposed facility when evaluating a permit application and determining whether to approve or deny a registration. Accordingly, TCEQ does not have authority under the TCAA to require or enforce any noise abatement measures. Noise ordinances are normally enacted by cities or counties and enforced by local law enforcement authorities. Commenters should contact their local authorities with questions or complaints about noise.

# Comment 11: Water Quality and Water Availability

Commenters expressed concern regarding the effect pollution from the proposed project will have on water quality and water availability which will affect the lives of the community as well as livestock and wildlife in the area that use the water sources in the area.

(Kevin Andrews, Joe Boles, Tom Brooking, Virginia Browning, Nick Browning, Dave Eagle, Rhonda Holliday, Daphne D. Kanas, Janet Keel, Daniel Scott Lakey, Christine C. Leftwich, Ronald Massingill, Gary Miller, Kathy Miller, Karen Pearson, Nannette Samuelson, Adrian Donald Shelley, Christine Weeks, Veronica Welch, Jack Wilson, Jimmy Wimberley)

**<u>Response 11</u>**: Although TCEQ is responsible for the environmental protection of all media (i.e., air, water, and the safe disposal of waste), the TCAA specifically addresses air-related issues. This permit will regulate the control and abatement of air emissions only. Therefore, issues regarding water quality and water availability issues or water testing are not within the scope of the review of this application.

Individuals are encouraged to report environmental concerns, including water quality issues, or suspected noncompliance with the terms of any permit or other environmental regulation by contacting TCEQ Dallas/Fort Worth Region Office at 817-588-5800 or by calling the 24-hour toll-free Environmental Complaints Hotline at 1 888-777-3186. TCEQ reviews all complaints received. If the facility is found to be out of compliance with the terms and conditions of the permit, the Applicant may be subject to enforcement action.

# Comment 12: Effect on Local Economy

Commenters voiced concern about the effects this project could have on the local economy by decreasing the local tourism attraction, and affecting businesses and farming from the increase of pollution in the air, water, and land.

(Donna Adair, Kevin Andrews, Mark Beatty, Joe Boles, Dave Eagle, Christine C. Leftwich, Ronald Massingill, Gary Miller, Kathy Miller, Amy Rawle, Nannette Samuelson, Cheryl Shadden, Veronica Welch, Jack Wilson, Shannon Wolf)

**Response 12:** Issues related to the local economy are outside the scope of review of an air quality permit. The Executive Director has reviewed the permit application in accordance with the applicable law, policy, and procedures, in accordance with the agency's mission to protect our state's human and natural resources consistent with sustainable economic development. If an applicant meets the requirements for an air quality permit, TCEQ must grant the permit.

# Comment 13: Location/Zoning/Future Industrialization of the Area

Commenters expressed concern regarding the location of the facility as it relates to current zoning ordinances and the proximity to residential and public areas, including schools. A commenter asked if there is supposed to be a 3-mile safety buffer surrounding power plants. Commenters also expressed concern about the impact of the proposed project on the future of the area and further industrialization of the area causing more and more pollution. (Donna Adair, Gertrisha Farmer, John W. Highsmith, Karen Pearson, Karen J. Russell, Jacqulyne Cleo Sawicky, Michael L. Tabor, Suzy Tabor, Shannon Wolf, Andrew J. Wolford)

**Response 13:** TCEQ does not have jurisdiction to consider plant location choices made by an applicant when determining whether to approve or deny a permit application, unless a statute or rule imposes specific distance limitations that are enforceable by TCEQ. Zoning and land use are beyond the authority of TCEQ for consideration when reviewing air quality permit applications, and such issues should be directed to local officials. The issuance of an air quality authorization does not override any local zoning requirements that may be in effect and does not authorize an applicant to operate outside of local zoning requirements.

TCEQ Dallas/Fort Worth Regional Office conducted a site review of the area on February 21, 2024. According to that site review, nuisance, odor, and hazard potentials were moderate. The review also described the surrounding land use as Industrial/Residential, and the nearest off-property receptor is a residential building approximately 1,610 feet away. The distance from the facility to the nearest property line, according to the site review, is approximately 339 feet. The recommendation of the Dallas/Fort Worth Regional Office was to proceed with the permit review, and the site review indicated no reasons to deny the permit application.

Individuals are encouraged to report any concerns about nuisance issues or suspected noncompliance with terms of any permit or other environmental regulation by contacting the TCEQ Dallas/Fort Worth Regional Office at 817-588-5800 or by calling the 24-hour toll-free Environmental Complaints Hotline at 1-888-777-3186. If the facility is found to be out of compliance with the terms and conditions of the permit, it may be subject to possible enforcement action.

Although TCEQ cannot consider zoning or land use, TCEQ does conduct a health effects review to ensure that there will be no adverse impacts to human health and welfare. As described in Response 1, a protectiveness review was conducted for all contaminants emitted. The maximum concentrations were evaluated at the property line, at the nearest off-property receptor, and at any schools located within 3,000 feet of the facilities and found to be protective of human health and the environment.

# Comment 14: Truck Traffic

Commenters voiced concern about increased traffic congestions of cars and trucks and damages to the roads as a result of the proposed project.

(Jill Henriksen, Cheryl Shadden)

**Response 14:** The Applicant is prohibited by TCEQ rule (30 TAC § 101.5) from discharging air contaminants, uncombined water, or other materials from any source which could cause a traffic hazard or interference with normal road use. If the sources are operated in compliance with the terms and conditions of the permit, these conditions should not occur. Individuals are encouraged to report any concerns about nuisance issues or suspected noncompliance with terms of

any permit or other environmental regulation by contacting TCEQ Dallas/Fort Worth Regional Office at 817-588-5800 or by calling the 24-hour toll-free Environmental Complaints Hotline at 1-888-777-3186. If the facility is found to be out of compliance with the terms and conditions of the permit, it may be subject to possible enforcement action.

Although TCEQ rules prohibit creation of a nuisance, TCEQ does not have jurisdiction to consider traffic, road safety, or road repair costs when determining whether to approve or deny a permit application. In addition, trucks are considered mobile sources, which are not regulated by TCEQ. TCEQ is also prohibited from regulating roads per the TCAA § 382.003(6) which excludes roads from the definition of "facility."

Similarly, TCEQ does not have the authority to regulate traffic on public roads, load-bearing restrictions, and public safety, including access, speed limits, and public roadway issues. These concerns are typically the responsibility of local, county, or other state agencies, such as the Texas Department of Transportation (TxDot) and the Texas Department of Public Safety (DPS). Concerns regarding roads should be addressed to the appropriate state or local officials.

# Comment 15: Fuel Type

John Highsmith questioned the use of natural gas for the proposed project because it is still a fossil fuel and emits pollutants when combusted.

**Response 15**: Under the TCAA, the TCEQ has jurisdiction to ensure the quality of the state's air through the regulation of the emissions of air contaminants. During the review of this permit, TCEQ ADMT analyzed the emissions modeled in the AQA that would be generated from the proposed facility using low sulfur natural gas as its fuel source, and ADMT concluded that emissions from the turbines would not cause or contribute to an exceedance of the NAAQS. Please see Response 1 for an evaluation of this project's impacts in relation to the NAAQS.

# Comment 16: Facility Use

Commenters expressed concern that the electricity to be generated by the proposed plant will be used to power a crypto mining facility, which will continue to disrupt their livelihood, and if approval of the permit would increase the nearby crypto mining facility's activity.

(Donna Adair, Robert Adair, Mary Allard, Ronnie Allard, Andrea M. Barber, Mark Beatty, James Bell, David Blankenship, Lisa Blankensip, Christine Brooking, Christian Brooks, A. Brooks, Curtis Brooks, Marie Brooks, Monica Brown, Nick Browning, Virginia Browning, Kim Burton, Celine Busnelli, Rodrigo G. Cantu, Ricky Carmack, Bruce Chase, Don Christiansen, Shenice Copenhaver, Mandy Deroche, Keisha Doss, Ward Dunn, Tommy Engle, Maci English, William Faraizl, Gertrisha Farmer, Lynnsey Goller, Holly Haefele, Juanita Hall, Kenneth Hall, Roberta Hannula, Roland Hannula, Tim Harris, Jill Henriksen, John W. Highsmith, Cynthia Marie Highsmith, Paul Holliday , Rhonda Holliday,Douglas Houg, Greg Johnson, Denna Jones, Daphne D Kanas, Seth Keel, Janet Keel, Margaret Killion, Robert Killion, Marcia L. Kurcz, Timothy J. Kurcz, Deanna Lakey, Daniel Scott Lakey, Patricia Larson, Geraldine Lathers, Jon R. Lewis, Ron L. Liddell, Randall J. Love, Mark Mathews, Toby Mitchell, Frank Moffitt, Brett Niebes, Karen Pearson, Brad Peden, Jonathan Pedroza, Courtney Pedroza, Beverley A. Potts, Larry M. Potts, Barbara Potts, Steven Potts, David T. Raffa, Tanner Randall, Wesley Rawle, Amy Rawle, Olean Roberts, Daniel R. Rohde, Gwyneth Rohde, Nancy Rohde, Martin Ruback, Chris Rubel, Karen J. Russell, Chesney Sampson, Jacqulyne Cleo Sawicky, Briana Seider, William Seider, Leeann Seider, Jeff Seider, Cheryl Shadden, Amanda Sims, Hunter Sims, Bob Slater, Suzanne Sloan, Alison Steele, Lindsey Stewart, Zachary Q. Stewart, Robert M. Taber, Richard Tanner, Santiago Torres, Rae Waldrod, Joseph Webber, Corey Webster, Jacob Webster, Tom Weeks, Thomas Weeks, Shannon Wolf, Peter Wolf, Annabel Wullaert)

**Response 16:** TCEQ is responsible for the environmental protection of air and water as well as the safe management of waste. This proposed permit will regulate the control and abatement of air emissions from the proposed facility, and Applicant is required to operate in compliance with its representations in the permit application.

TCEQ does not have jurisdiction to consider facility-use choices made by an applicant when determining whether to approve or deny a permit application, but does ensure that Applicant's operation of the facility in accordance with the permit limits should not cause an exceedance of the NAAQS. Additionally, this permit is limited in scope to this proposed facility and would not authorize changes in operation to facilities not covered by this permit. Please see Response 1 for an evaluation of this project's impacts in relation to the NAAQS.

# Comment 17: Emission Rates and Calculations

Commenters questioned the accuracy and methodology for determining the emission rates for the proposed project. Commenters questioned if the planned maintenance, startup, and shutdown (MSS) events and their higher emissions rates are accounted for in the proposed project. Commenters are concerned with the presence of mercury in the natural gas used to fuel the turbines and expressed concern that the mercury and other heavy metal emissions, such as lead, are not being accurately accounted for in the proposed project. Commenters questioned if there were methods in place to measure the mercury content of the natural gas that would be burned. Commenters questioned if plant cycling was evaluated for the proposed project. Commenters expressed concerns that the applicant will not be complying with the new EPA rule and exceeding the 40% capacity factor represented in the application.

(Donna Adair, Robert Adair, Mary Allard, Ronnie Allard, Kevin Andrews, Andrea M. Barber, Mark Beatty, James Bell, Lisa Blankenship, David Blankenship, Joe Boles, A. Brooks, Christian Brooks, Curtis Brooks, Marie Brooks, Jim Brown, Nick Browning, Virginia Browning, Richard Brunning, Kim Burton, Ricky Carmack, Bruce Chase, Shenice Copenhaver, Keisha Doss, Dave Eagle, Tommy Engle, Maci English, William Faraizl, Lynnsey Goller, Kenneth Hall, Juanita Hall, Roberta Hannula, Roland Hannula, Tim Harris, John W. Highsmith, Douglas Houg, Greg Johnson, Denna Jones, Margaret Killion, Robert Killion, Timothy J. Kurcz, Marcia L. Kurcz, Daniel Scott Lakey, Deanna Lakey, Patricia Larson, Randall D. Larson, Geraldine Lathers, Christine C. Leftwich, Randall J. Love, Ronald Massingill, Mark Mathews, Lisa McDermott, Toby Mitchell, Frank Moffitt, Brett Niebes, Karen Pearson, Brad Peden, Jonathan Pedroza, Courtney Pedroza, Barbara Potts, Larry M. Potts, Steven Potts, Beverley A. Potts, David T. Raffa, Tanner Randall, Wesley Rawle, Amy Rawle, Olean Roberts, Nancy Rohde, Daniel R. Rohde, Gwyneth Rohde, Martin Ruback, Chris Rubel, Nannette Samuelson, Briana Seider, Jeff Seider, Leeann Seider, William Seider, Cheryl Shadden, Adrian Donald Shelley, Amanda Sims, Hunter Sims, Bob Slater, Suzanne Sloan, Lindsey Stewart, Zachary Q. Stewart, Richard Tanner, Santiago Torres, Rae Waldrod, James Wall, Joseph Webber, Corey Webster, Jacob Webster, Thomas Weeks, Veronica Welch, Jack Wilson, Shannon Wolf, Peter Wolf, Andrew J. Wolford, Annabel Wullaert)

**Response 17:** Emissions from this facility were determined by mathematical equations calculated according to the EPA's Compilation of Air Pollutant Emission Factors, AP-42 Manual, TCEQ guidance documents, vendor data, engineering calculations, mass balance calculations, and by following other references. The Applicant represented the appropriate methodologies to control and minimize emissions and utilized corresponding control efficiencies when calculating the emission rates. As provided in 30 TAC § 116.116(a), the Applicant is bound by these representations, including the represented performance characteristics of the control equipment and any representations concerning MSS activities. In addition, the permit holder must operate within the limits of the permit, including the emission limits as listed in the Maximum Allowable Emissions Rate Table (MAERT). The higher hourly emission rates of NO<sub>x</sub> and CO during MSS are represented in the MAERT and are based on manufacturer provided data. Draft Special Condition No. 6 limits the combustion turbine generators to not exceed an annual firing rate of 13,076,000 MMBtu/yr on a 12-month rolling average, which is based on each turbine operating at approximately 3500 hours per year ~39.95%). Special Condition No. 5 of the draft permit limits the duration of each startup and shutdown periods to not exceed 60 minutes per event.

The proposed project consists of eight natural gas-fired simple-cycle combustion turbines. Three scenarios were evaluated for the eight proposed turbines. The first scenario represents normal operations with MSS operations occurring simultaneously, the second scenario represents testing operations with MSS operations occurring simultaneously, and the third scenario represents startup/shutdown operations with MSS operations occurring simultaneously. Within each scenario for short-term analyses, twenty-five operational scenarios were used to evaluate the various load operations and associated parameters of the eight new turbines and two existing turbines to ensure worst-case operations were evaluated. TCEQ found that these operational scenarios are expected to meet all state and federal protectiveness standards.

In regards to the new EPA rule and the company exceeding a 40% capacity factor, it appears that the commenter is referring to 40 CFR Part 60 Subpart TTTTa, where intermediate load combustion turbines that supply between 20%

to 40% of their potential electric output as net-electric sales on both a 12operating month and a 3-year rolling average basis are subjected to limits specified in the rule. However, this rule does not apply to the proposed project because these turbines were constructed prior to the May 23, 2023 rule applicability date and not being modified with the proposed project and are therefore not subject to the rule. The turbines are also subject to an annual heat input limit of 13,076,000 MMBtu/yr on a 12-month rolling average under draft Special Condition No. 6 of the permit, and the company is required to maintain records of the amount of natural gas fired on 12-month rolling average basis under draft Special Condition No. 26.C of the proposed permit to show compliance with this limit.

Additionally, concerning mercury emissions from nature gas-fired turbines, according to EPA's AP-42 Vol. 1, Chapter 3.1: Stationary Gas Turbines, there are no emission factors for mercury or other heavy metals—including lead—from natural gas-fired turbines. Typically, natural gas fired simple-cycle combustion turbine permits do not include emission rate limits for heavy metals, such as mercury and lead.

# Comment 18: Visible Pollution/Fire/Explosions

Commenters stated concerns about the visible pollution that will be emitted from the site. Commenters expressed concern with the fire/explosions that have happened at the existing site, which has caused multiple panic attacks and anxiety to their families and pets.

(Donna Adair, Robert Adair, Mark Beatty, Nick Browning, Virginia Browning, Patricia Larson, Randall D Larson, Geraldine Lathers, Karen Pearson, Karen J. Russell, Cheryl Shadden)

**Response 18:** TCEQ takes health and environmental concerns seriously. The proposed permit meets all federal and state regulatory requirements and is protective of human health and the environment. If you have been adversely impacted by emissions from the facility, you may file a complaint with the TCEQ Dallas/Fort Worth Region Office at 817-588-5800 or by calling the 24-hour toll free Environmental Complaints Hotline at 1-888-777-3186).

In the event of an emergency, the Local Emergency Planning Committee and the regulated entity have the primary responsibility of notifying potentially impacted parties regarding the situation. In addition, as set forth in 30 TAC § 101.201(a), regulated entities are required to notify TCEQ regional office within 24 hours of the discovery of releases into the air and in advance of maintenance activities that could or have resulted in excess emissions.

Proposed projects which involve toxic chemicals that are known or suspected to have potential for life threatening effects upon off-facility property in the event of a disaster and involve manufacturing processes that may contribute to the potential for disastrous events, may require a disaster review for the application. This application did not require a disaster review.

Accordingly, the draft permit's MAERT lists the only emissions authorized to be emitted from the proposed project. TCEQ defines an upset event as an unplanned or unanticipated occurrence or excursion of a process or operation that results in an unauthorized emissions of air contaminants. An upset event that results in unauthorized emissions from an emission point is an emissions event. If an upset occurs, the permit holder must comply with the requirements in 30 TAC § 101.201 regarding the recording and reporting of emission events. If the permit holder fails to report in accordance with 30 TAC § 101.201, the commission may initiate enforcement action for failing to report the underlying emissions event itself. Emissions from historical unplanned emission events or upsets are not included in the impact analysis as the NSR permit does not authorize upset events.

Additionally, draft Special Condition No. 8 limits visible emissions to 5% averaged over a six-minute period. If there are any exceedances, the exceedances are required to be documented and corrective action to eliminate the source must be taken within one operating week. If visible emissions are observed, Response 25 provides more information on how to file a complaint.

# **Comment 19: Federal Applicability**

Commenters voiced concern about the quantity of emissions that will result from the project and if the project requires federal review. Commenters voiced concern that there was no mention of public health in the PSD review. Commenters expressed concern that the public notice stated emissions of pollutants are "significant".

(Donna Adair, Robert Adair, Rodrigo G Cantu, Celine, Mandy Deroche, Keisha Doss, John W. Highsmith, Geraldine Lathers, Ron L. Liddell, Cheryl Shadden, Joseph Webber, Shannon Wolf)

**Response 19:** The terminology "significant" that is stated in the public notice refers specifically to the regulatory language in the EPA Prevention of Significant Deterioration (PSD) rules. A Prevention of Significant Deterioration (PSD) major site is defined as a site emitting over 250 tpy of any one pollutant if it is an unnamed source or 100 tpy of any one pollutant if it is one of 28 sources named in 40 CFR § 52.21(b)(1)(a). Once it is determined a site is major, the project emission increases for each pollutant are compared to the applicable significant emission rate to determine if that pollutant requires PSD review. This site is a named source and has proposed emission rates greater than 100 tpy of at least one pollutant, making it a major source. In addition, the proposed increases of the following pollutants are above the defined significant emission rates and are subject to PSD permitting: NO<sub>x</sub>, CO, PM/PM<sub>10</sub>/PM<sub>25</sub>, and GHGs as  $CO_2$  equivalents ( $CO_2e$ ). The proposed increases of all other pollutants with this project are below the significant emission rates and are not subject to PSD permitting. A PSD review was required and thus a more stringent review was conducted, which includes a modeling and impacts analysis ensuring the protectiveness to public health and environment, as well as soil, vegetation, and/or Class 1 areas. See Response 1 for more information on the air quality analysis conducted.

Nonattainment New Source Review (NNSR) permitting is applicable for major sites, defined as a site emitting over the threshold for the nonattainment

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pollutant in that county. Texas nonattainment area designations are specified in 40 CFR § 81.344. Once it is determined a site is major, the project emission increases for each pollutant are compared to the applicable significant emission rate to determine if that pollutant requires netting. If the project's net emissions are greater than the netting threshold, the project is subject to NNSR permitting. Because the site is not located in a nonattainment county, the project is not subject to NNSR permitting. See Response 3 for more information.

#### Comment 20: Environmental Impact Study

A commenter requested that an environmental impact study be conducted prior to authorization of this project.

(Andrew J. Wolford)

**Response 20:** Environmental Assessments and Environmental Impact Statements (EIS) are a specific requirement for federal agencies under the National Environmental Policy Act (NEPA). An EIS is not required for state actions such as this permit. However, both the TCAA and TCEQ rules provide for an extensive review of the application to ensure that emissions from the proposed facility will not exceed the NAAQS and will not be expected to adversely affect human health or the environment. A health effects review was conducted for the proposed facilities during the permit review and the permit was found to be protective of human health and the environment. See Response 1 for more information about the air quality analysis conducted.

# Comment 21: Environmental Justice

Commenters raised concerns regarding the environmental justice implications of this project.

(Mark Beatty, Christine Brooking, Holly Haefele, Adrian Donald Shelley, Tom Weeks)

**Response 21:** Air permits evaluated by TCEQ are reviewed without reference to the socioeconomic or racial status of the surrounding community. TCEQ is committed to protecting the health of the people of Texas and the environment regardless of location. A health effects review was conducted for the proposed facilities during the permit review and the permit was found to be protective of human health and the environment.

TCEQ encourages participation in the permitting process. The Office of the Chief Clerk works to help the public and neighborhood groups participate in the regulatory process to ensure that agency programs that may affect human health or the environment operate without discrimination and to make sure that concerns are considered thoroughly and are handled in a way that is fair to all. You may contact the Office of the Chief Clerk at 512-239-3300 for further information. More information may be found on TCEQ website: <a href="https://www.tceq.texas.gov/agency/decisions/participation/title-vi-compliance">https://www.tceq.texas.gov/agency/decisions/participation/title-vi-compliance</a>.

# **Comment 22: Corporate Profits**

Commenters questioned the corporate profits made by this project at a cost to the surrounding community.

(Donna Adair, Robert Adair, James Bell, James Bell, Christine Brooking, Monica Brown, Monica Brown, Jill Henriksen, John W. Highsmith, Cynthia Marie Highsmith, Seth Keel, Janet Keel, Janet Keel, Daniel Scott Lakey, Patricia Larson, Randall D. Larson, Ron L. Liddell, Cheryl Shadden, Adrian Donald Shelley, Adrian Donald Shelley, Robert M. Taber, Monica Vickery, Joseph Webber, Joseph Webber, Tom Weeks)

**Response 22:** Under TCAA, TCEQ regulates facilities that contain a source of air emissions. Accordingly, TCEQ is not authorized to consider a company's financial status nor any profits that may be made in the review of air quality applications. TCEQ's review of this company's application included analysis of health impacts and application of BACT, and based on this review, the facility should comply with all applicable health effects guidelines and emission control requirements.

Continued compliance with health effects guidelines and BACT requirements is expected if the company operates in compliance with the permit terms and conditions. Individuals are encouraged to report any environmental concerns at the facility by contacting TCEQ Dallas/Fort Worth Region Office at 817-588-5800 or by calling the 24-hour toll-free Environmental Complaints Hotline at 1-888-777-3186. TCEQ evaluates all complaints received. If the facility is found to be out of compliance with the terms and conditions of the permit, it may be subject to possible enforcement action.

# **Comment 23: Demonstrate Compliance with Permit**

Commenters asked how the Applicant will demonstrate compliance with the terms of their permit on a continuous basis. Commenters expressed concerns that the applicant has already begun construction of the new power plant.

(Jim Brown, Nick Browning, Celine Busnelli, Rodrigo G. Cantu, Dementra Conrad, Mandy Deroche, Clint Helton, John W. Highsmith, Cynthia Marie Highsmith, Daniel Scott Lakey, Geraldine Lathers, Brett Niebes, Cheryl Shadden, Adrian Donald Shelley, Bob Slater, Bob Slater, Robert M. Taber, Michael L. Tabor, Suzy Tabor)

**Response 23:** Special conditions have been included as part of the proposed permit to ensure the Applicant can demonstrate compliance with the emission limitations set forth in the permit. Emissions will be monitored by stack testing, continuous fuel flow monitoring, audio, visual, and olfactory (AVO) checks, fuel usage monitoring, and recordkeeping. The permit holder is also required to maintain records to demonstrate compliance, including the monitoring listed above. Records must be made available upon request to representatives of TCEQ, EPA, or any local air pollution control program having jurisdiction. The Regional Office may perform investigations of the plant as required. The investigation may include an inspection of the site including all equipment, control devices, monitors, and a review of all calculations and required recordkeeping. The proposed permit has not been finalized or issued and the

applicant must follow 30 TAC § 116.110 with regards to the construction of the proposed power plant. See below for more information on how to file a complaint.

# Comment 24: Complaints

Commenters asked how to register a complaint and how complaints are addressed. Commenters also questioned the difficulty of filing a complaint due to multiple offices within TCEQ.

(Cynthia Marie Highsmith, John W Highsmith, Geraldine Lathers), Suzy Tabor, Michael L Tabor)

**Response 24:** TCEQ evaluates all complaints received. If a facility is found to be out of compliance with the terms and conditions of its permit, it will be subject to investigation and possible enforcement action. Individuals are encouraged to report any concerns about nuisance issues or suspected noncompliance with terms of any permit or other environmental regulation by contacting TCEQ Dallas/Fort Worth Regional Office at 817-588-5800 or by calling the 24-hour toll-free Environmental Complaints Hotline at 1-888-777-3186.

Citizen-collected evidence may be used in such an action. *See* 30 TAC § 70.4, Enforcement Action Using Information Provided by Private Individual, for details on gathering and reporting such evidence. Under the citizen-collected evidence program, individuals can provide information on possible violations of environmental law. The information, if gathered according to agency procedures and guidelines, can be used by TCEQ to pursue enforcement. In this program, citizens can become involved and may eventually testify at a hearing or trial concerning the violation. For additional information, see TCEQ publication, "Do You Want to Report an Environmental Problem? Do You Have Information or Evidence?" This booklet is available in English and Spanish from TCEQ Publications office at 512-239-0028 and may be downloaded from the agency website at <u>http://www.tceq.texas.gov</u> (under Publications, search for document number 278).

# Comment 25: Compliance History/Violations/Enforcement

Commenters expressed concern about the compliance history of the applicant and site. Commenters asked about the consequences of violating the terms of the permit. Commenters voiced concern about the applicant's previous violations at other sites.

(Donna Adair, Robert Adair, Ronnie Allard, Mary Allard, Andrea M. Barber, Mark Beatty, Lisa Blankenship, David Blankenship, A. Brooks, Christian Brooks, Curtis Brooks, Marie Brooks, Virginia Browning, Nick Browning, Kim Burton, Celine Busnelli, Rodrigo G. Cantu, Ricky Carmack, Bruce Chase, Shenice Copenhaver, Mandy Deroche, Keisha Doss, Tommy Engle, Maci English, William Faraizl, Lynnsey Goller, Kenneth Hall, Juanita Hall, Roland Hannula, Roberta Hannula, Tim Harris, Cynthia Marie Highsmith, John W. Highsmith, Douglas Houg, Greg Johnson, Denna Jones, Robert Killion, Margaret Killion, Timothy J. Kurcz, Marcia L. Kurcz, Deanna Lakey, Daniel Scott Lakey, Geraldine Lathers, Randall J. Love, Mark Mathews, Toby Mitchell, Frank Moffitt, Brett Niebes, Karen Pearson, Brad Peden, Jonathan Pedroza, Courtney Pedroza, Steven Potts, Barbara Potts, Beverley A. Potts, Larry M. Potts, David T. Raffa, Tanner Randall, Wesley Rawle, Amy Rawle, Olean Roberts, Gwyneth Rohde, Nancy Rohde, Daniel R. Rohde, Martin Ruback, Chris Rubel, Leeann Seider, William Seider, Jeff Seider, Briana Seider, Cheryl Shadden, Amanda Sims, Hunter Sims, Bob Slater, Suzanne Sloan, Zachary Q. Stewart, Lindsey Stewart, Robert M. Taber, Richard Tanner, Santiago Torres, Rae Waldrod, Joseph Webber, Jacob Webster, Corey Webster, Thomas Weeks, Peter Wolf, Shannon Wolf, Annabel Wullaert)

# Response 25:

# **Compliance History**

During the technical review of the permit application, a compliance history review of both the company and the site is conducted based on the criteria in 30 TAC Chapter 60. These rules may be found at the following website: <u>https://www.tceq.texas.gov/rules/index.html</u>.

The compliance history is reviewed for the five-year period prior to the date the permit application was received and includes multimedia compliance-related components about the site under review. These components include: enforcement orders, consent decrees, court judgments, criminal convictions, chronic excessive emissions events, investigations, notices of violations, audits and violations disclosed under the Audit Act, environmental management systems, voluntary on-site compliance assessments, voluntary pollution reduction programs, and early compliance. However, TCEQ does not have jurisdiction to consider violations outside of the State of Texas.

A company and site may have one of the following classifications and ratings:

- High: rating below 0.10 complies with environmental regulations extremely well;
- Satisfactory: rating 0.10 55.00 generally complies with environmental regulations;
- Unsatisfactory: rating greater than 55.00 fails to comply with a significant portion of the relevant environmental regulations.

This site has a rating of 0.00 and a classification of 'high'. The company rating has a rating of 0.00 and a classification of 'high'. The company rating reflects the average of the ratings for all sites the company owns in Texas.

# Violations/Enforcement

Violations are usually addressed through a notice of violation letter that allows the operator a specified period of time within which to correct the problem. The violation is considered resolved upon timely corrective action. A formal enforcement referral will be made if the cited problem is not timely corrected, if the violation is repeated, or if a violation is causing substantial impact to the environment or neighbors. In most cases, formal enforcement results in an agreed enforcement order including penalties and technical requirements for corrective action. Penalties are based upon the severity and duration of the violation(s). Violations are maintained on file and are included in the calculation Executive Director's Response to Public Comment Wolf Hollow II Power, LLC, Permit Nos. 175173, GHGPSDTX238, and PSDTX1636 Page 35 of 37

of a facility and a person's compliance history. Compliance history ratings are considered during permit application reviews.

#### Comment 26: TCEQs Responsibility to the Community/General Opposition/Support

Commenters asked that TCEQ consider residents and their wishes and choose not to approve the permit registration for the proposed plant. Commenters expressed concerns that the permit has already been issued to the applicant. Commenters voiced support for expanding the output of the power plant.

(Donna Adair, Robert Adair, Kevin Andrews, Mark Beatty, James Bell, Joe Boles, Christine Brooking, Monica Brown, Jim Brown, Alonna Brown, Christianna Brown, Nick Browning, Virginia Browning, Richard Brunning, Don Christiansen, Demetra Conrad, Shenice Copenhaver, Travis Copenhaver, Alan Crawford, Keisha Doss, Wyveda Dowdy, Ward Dunn, Kay Dykes, Tom Dykes, Dave Eagle, Gertrisha Farmer, Michael Graft, Melanie Graft, Holly Haefele, Ted Hayes, Linda Hayes, Brent Hayes, Clint Helton, Jill Henriksen, Helen Hensel, John W. Highsmith, Cynthia Marie Highsmith, Paul Holliday, Rhonda Holliday, John Joslin, Daphne D. Kanas, Daniel Scott Lakey, Randall D. Larson, Patricia Larson, Geraldine Lathers, Christine C. Leftwich, Ron L. Liddell, Janet M. Lowery, Gregory Scott Martin, Ronald Massingill, Mark McDermott, Lisa McDermott, Barbara Meuter, Gary Miller, Kathy Miller, William Nichols, Liana Oechsle, Karen Pearson, Christy Rains, C. R. Rains, Wesley Rawle, Amy Rawle, Gina Rogers, Mark Rogers, Eva Royer, Karen J. Russell, Chesney Sampson, Nannette Samuelson, Jacqulyne Cleo Sawicky, Cheryl Shadden, Sheri Shaw, Adrian Donald Shelley, Nikki Sopchak, Alison Steele, Robert M. Taber, Suzy Tabor, Michael L. Tabor, Melanie R. Taylor, Timothy Taylor, Audrie Tibljas, Edward J. Tibljas, Kim Tibljas, Jerry Turner, Monica Vickery, James Wall, Joseph Webber, Thomas Weeks, Tom Weeks, Veronica Welch, Van Austin Williams, Jack Wilson, Mary Wimberley, Jimmy Wimberley, Walter Wimberley, Shannon Wolf, Annette Worthington)

**Response 26:** TCEQ appreciates the comments and interest from the public in environmental matters before the agency and acknowledges the comments in opposition and support of the project. The TCAA establishes TCEQ's jurisdiction to regulate air emission in the state of Texas. Accordingly, the Executive Director's staff has reviewed the permit application in accordance with the applicable state and federal law, policy and procedures, and the agency's mission to protect the state's human and natural resources consistent with sustainable economic development. TCEQ cannot deny authorization of a facility if a permit application contains a demonstration that all applicable statutes, rules, and regulations will be met.

The Executive Director has only made a preliminary decision. Thus, the final decision on the proposed permit has not been made or finalized, meaning the proposed permit has not been issued. All timely formal comments received are included in this Response and are considered before a final decision is reached on the permit application.

# Comment 27: Reduction of Presently Emitted Pollution

Commenters expressed concerns with Wolf Hollow I, Wolf Hollow II, and Marathon Digital that are already at the existing site and the pollutions they currently emit. Commenters also requested that the presently emitted pollution from the existing site to be reduced.

(Donna Adair, Robert Adair, Mary Allard, Ronnie Allard, Andrea M. Barber, Mark Beatty, James Bell, David Blankenship, Lisa Blankenship, Christine Brooking, A. Brooks, Christian Brooks, Curtis Brooks, Marie Brooks, Monica Brown, Jim Brown, Nick Browning, Virginia Browning, Richard Brunning, Kim Burton, Celine Busnelli, Rodrigo G. Cantu, Ricky Carmack, Bruce Chase, Don Christiansen, Demetra Conrad. Shenice Copenhaver, Mandy Deroche, Keisha Doss, Ward Dunn, Dave Eagle, Tommy Engle, Maci English, William Faraizl, Gertrisha Farmer, Lynnsey Goller, Holly Haefele, Juanita Hall, Kenneth Hall, Roberta Hannula, Roland Hannula, Tim Harris, Clint Helton, Iill Henriksen, Helen Hensel, John W. Highsmith, Cynthia Marie Highsmith, Douglas Houg, Greg Johnson, Denna Jones, Daphne D. Kanas, Seth Keel, Janet Keel, Margaret Killion, Robert Killion, Marcia L. Kurcz, Timothy J. Kurcz, Deanna Lakey, Daniel Scott Lakey, Patricia Larson, Geraldine Lathers, Jon R. Lewis, Ron L. Liddell, Randall J. Love, Gregory Scott Martin, Mark Mathews, Toby Mitchell, Frank Moffitt, Brett Niebes, Karen Pearson, Brad Peden, Jonathan Pedroza, Courtney Pedroza, Beverley A. Potts, Larry M. Potts, Barbara Potts, Steven Potts, David T. Raffa, Tanner Randall, Wesley Rawle, Amy Rawle, Olean Roberts, Daniel R. Rohde, Gwyneth Rohde, Nancy Rohde, Martin Ruback, Chris Rubel, Karen J. Russell, Chesney Sampson, Nannette Samuelson, Jacqulyne Cleo Sawicky, Briana Seider, William Seider, Leeann Seider, Jeff Seider, Chervl Shadden, Amanda Sims, Hunter Sims, Bob Slater, Suzanne Sloan, Morgan Stanley, Alison Steele, Lindsey Stewart, Zachary Q. Stewart, Robert M. Taber, Richard Tanner, Santiago Torres, Monica Vickery, Rae Waldrod, Joseph Webber, Corey Webster, Jacob Webster, Tom Weeks, Thomas Weeks, Shannon Wolf, Peter Wolf, Annabel Wullaert)

**Response 27:** These comments are outside the scope of the air permit review or addressed to the Applicant and are therefore included for completeness, but not addressed by the Executive Director.

With regards to the reduction to presently emitted pollution from the existing site, the scope of the permit review is strictly limited to the proposed facility and not to any other existing facilities. However, as discussed in the air quality modeling in response 1, cumulative effects are evaluated for all on-property sources, applicable off-property sources, and representative monitored background concentrations for the modeled pollutants that exceeded the de minimis levels.

Executive Director's Response to Public Comment Wolf Hollow II Power, LLC, Permit Nos. 175173, GHGPSDTX238, and PSDTX1636 Page 37 of 37

# CHANGES MADE IN RESPONSE TO COMMENT

No changes to the draft permit have been made in response to public comment.

Respectfully submitted,

Texas Commission on Environmental Quality

Kelly Keel, Executive Director

Phillip Ledbetter, Director Office of Legal Services

Charmaine Backens, Deputy Director Environmental Law Division

Katherine Keithley, Staff Attorney Environmental Law Division State Bar Number 24127590 PO Box 13087, MC 173 Austin, Texas 78711-3087

REPRESENTING THE EXECUTIVE DIRECTOR OF THE TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

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Activity Action List:					
Date	Document Type	Action			
05/20/2025	SOAH HEARING	SCHEDULED			
04/04/2025	NOTICE OF SOAH HEARING	MAILED			
02/20/2025	INTERIM ORDER	MAILED			
02/18/2025	INTERIM ORDER	SIGNED			
02/13/2025	COMMISSION AGENDA	SCHEDULED			
01/03/2025	AGENDA SETTING LTR	MAILED			
12/23/2024	RFR/HR PERIOD	END			
12/13/2024	TCEQ DOCKET NUMBER	REQUESTED			
12/13/2024	TCEQ DOCKET NUMBER	ISSUED			
11/22/2024	FINAL DECISION LETTER	MAILED			
11/15/2024	RESPONSE TO COMMENTS	RECEIVED			
09/12/2024	AVAILABILITY VERIFICATIO	RECEIVED			
09/12/2024	ALTERNATIVE LANGUAGE VERIFICATION FORM	RECEIVED			
09/11/2024	COMMENT PERIOD	END			
09/09/2024	PUBLIC MEETING	HELD			
09/09/2024	PUBLIC MEETING	SCHEDULED			
08/13/2024	ALTERNATIVE LANGUAGE AFFIDAVIT	RECEIVED			
08/13/2024	NEWSPAPER TEARSHEET	RECEIVED			
08/13/2024	ALTERNATIVE LANGUAGE TEARSHEET	RECEIVED			
08/13/2024	AFFIDAVIT - NAPD	RECEIVED			
08/10/2024	NOTICE - PRELIM DECISION	PUBLISHED			
08/06/2024	ALTERNATIVE LANGUAGE NOTICE	PUBLISHED			
08/01/2024	NOTICE OF PUBLIC MEETING	MAILED			
07/30/2024	NOTICE OF PUBLIC MEETING	RECEIVED			
07/30/2024	NOTICE - PRELIM DECISION	RECEIVED			
06/21/2024	LETTER	SENT TO			
06/18/2024	PUBLIC MEETING	ED APPROVE			
04/16/2024	AVAILABILITY VERIFICATIO	RECEIVED			
04/16/2024	ALTERNATIVE LANGUAGE VERIFICATION FORM	RECEIVED			
04/04/2024	COMMENT PERIOD	END			

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03/15/2024	ALTERNATIVE LANGUAGE AFFIDAVIT	RECEIVED
03/15/2024	NEWSPAPER TEARSHEET	RECEIVED
03/15/2024	ALTERNATIVE LANGUAGE TEARSHEET	RECEIVED
03/15/2024	AFFIDAVIT - NORI	RECEIVED
03/05/2024	ALTERNATIVE LANGUAGE NOTICE	PUBLISHED
03/02/2024	NOTICE OF RECEIPT/INTENT	PUBLISHED
02/29/2024	LETTER	SENT TO
02/05/2024	NOTICE OF RECEIPT/INTENT	MAILED
02/01/2024	NOTICE OF RECEIPT/INTENT	RECEIVED
02/01/2024	ADMIN REVIEW	COMPLETE
01/25/2024	APPLICATION	RECEIVED

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