

**From:** [David Ramirez](#)  
**To:** [REDACTED]  
**Cc:** [Anita Keese](#); [Ramiro Garcia](#); [OCE](#)  
**Subject:** Re: Excess Emissions Report  
**Date:** Wednesday, April 29, 2020 5:34:36 PM

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Good afternoon Mr. Baker,

The TCEQ has received your request for enforcement discretion for reporting requirements related to gas turbine #1 (Source E-1) and gas turbine #2 (Source E-2) for the C R Wing Cogeneration Plant (RN100215896) owned and operated by Power Resources, Ltd. (CN601233513). Specifically, you have requested:

- Enforcement discretion for the failure to submit quarterly excess emission reports for the first quarter of 2020 as required by 30 TAC 116.115(c) and Special Condition No. 15(F).

The enforcement discretion is effective [until May 31, 2020](#). These required activities should be completed as soon as practicable, as conditions allow, before this date and should an extension beyond this be needed, please re-submit your request. This discretion is limited to the Texas Commission on Environmental Quality and does not limit EPA's ability to enforce federal regulations.

The TCEQ remains committed to working with our regulated community on a case by case basis. Regulated entities must maintain records adequate to document activities related to the noncompliance under enforcement discretion, including details of the regulated entity's best efforts to comply.

Regards,  
David A. Ramirez, Area Director  
Border and Permian Basin Area  
Texas Commission on Environmental Quality

On Apr 29, 2020, at 8:59 AM, David Ramirez <[david.ramirez@tceq.texas.gov](mailto:david.ramirez@tceq.texas.gov)> wrote:

Good morning Mr. Baker,

This email confirms receipt of your correspondence. We are reviewing your request and expect to have a response soon.

Regards,  
David A. Ramirez, Area Director  
Border and Permian Basin Area

Texas Commission on Environmental Quality

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**From:** Baker, Jerry [REDACTED]  
**Sent:** Tuesday, April 28, 2020 6:45 PM  
**To:** OCE <[OCE@tceq.texas.gov](mailto:OCE@tceq.texas.gov)>  
**Cc:** Baker, Jerry [REDACTED]  
**Subject:** Excess Emissions Report

As directed by the Midland, TX Region 7 TCEQ office, Power Resources is requesting Enforcement Discretion in submitting its quarterly excess emission reports for gas turbine #1 (Source E-1) and gas turbine #2 (Source E-2) for the 1<sup>st</sup> quarter of 2020. Power Resources needs Snyder Electric's (Plant Control System Manufacturer) assistance in collecting/extracting missing fuel flow data for the 1<sup>st</sup> quarter due to a control system upgrade and Btu analyzer issues. The data needed is in the control system historian and Snyder Electric is working with PRI to extract the necessary data in order to submit accurate excess emissions reports. Snyder Electric's support staff has numerous Covid 19 personnel protective measures in place which are slowing the process and making it necessary to request a thirty day extension and enforcement discretion. Snyder Electric has implemented mandatory usage of vacation time (50%), also has some individuals on work from home assignments and others on 32 hour work weeks all associated with their effort to combat the Covid 19 virus. All of these factors have prohibited Power Resources from getting a timely response on pulling the necessary historical gas flows used in calculating/determining excess emissions. Snyder Electric has been made aware of Power Resources needed request and the urgency in responding, however key personnel necessary to retrieve the data and confirm accuracy have been unavailable and/or delayed. Once the data is provided Power Resources needs some time to confirm accuracy and input into an acceptable format for submittal. Please advise on next steps and approval. Power Resources desires to submit the report timely however these delays are making this goal unobtainable at this time. We greatly appreciate your consideration and response.

Thank You

Jerry Baker  
General Manager

**2020 Excess Emissions – 1<sup>th</sup> Quarter Report**  
**TCEQ Permit R-17411 / EPA PSD-TX-720M2**  
**Account No. HT-0065-Q**  
**CN601233513      RN100215896**