

From: Rajiv Patel
To: [James Nolan](#)
Cc: [Matthew Thompson](#)
Subject: RE: SpaceX EGU
Date: Wednesday, August 1, 2018 3:07:38 PM

James,

Please withdraw our Standard Permit Application that is currently under review (referenced in your e-mail below). We will be submitting authorization for this source under Permit by Rule and would also like to request that the fee paid for the Standard Permit (\$900) be transferred to pay for the PI-7 registration (\$450).

Please let me know if you require additional information.

Thank You,

Rajiv

Rajiv Y. Patel, PE

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From: James Nolan <james.nolan@tceq.texas.gov>
Sent: Monday, July 30, 2018 10:40 AM
To: Rajiv Patel <rajiv@greenthinkconsulting.com>
Subject: SpaceX EGU

Rajiv –

I am the permit reviewer assigned to the EGU Standard Permit project at Space Exploration Technologies Corp.'s Launch Site in Cameron County, Texas. You are identified as the Technical Contact in the documentation submitted to the TCEQ. During my initial review of the documentation submitted to the TCEQ, I noticed some issues that require additional information before I can complete my review.

Based on the introduction and project description, I don't know if the EGU Standard Permit is the

authorization that you need here; The EGU Standard Permit is specific for generators that are supplying power to the grid. It seems like you are planning to use the equipment to provide on-site power that will not be delivered to the external electrical grid. I think that this unit would be better authorized under [106.512 \(Engines and Turbines\)](#). [106.512\(7\)](#) makes it seem like this would not be an option, however [in 2006 a memo was issued](#) outlining how 106.512 can be used to authorize on-site power:

Effective immediately, PBR §106.512 may be claimed to authorize engines or turbines used to generate electricity exclusively for on-site use at locations where the electric grid is not readily available or where it is not economically feasible to connect to the electric grid. The owner or operator of the site may be asked to validate that access to the electric grid is not available in the local area or to describe why connecting to the grid is not economically feasible. Economic feasibility is generally not part of a Permit by Rule review. However, to provide flexibility and offer the applicant the option to use a PBR, we have made an attempt to allow limited discussion for this issue.

Can you take a look and let me know what you think? I think this project will need to be withdrawn and resubmitted as a 106.512; I think the only thing the 106.512 submittal will need is a NAAQS demonstration and a 106.512 checklist, everything else should transfer over. You can add a sentence or two explaining why it is not economically feasible in the introduction to comply with the memo.

TCEQ has a 5 day policy on missing/deficient information:

<https://www.tceq.texas.gov/assets/public/permitting/air/memos/voidguide06.pdf>. Please provide the above information **as soon as possible, but no later than close of business August 6, 2018**. If this cannot be met, TCEQ can provide an opportunity for additional time (known as a deficiency or void letter) that will provide up to 6 months for the missing/deficient information to be provided. There are no extra fees associated with this process. Otherwise, I look forward to hearing from you.

James Nolan
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