

October 11, 2024

Air Permits Initial Review Team (APIRT), MC-161  
Texas Commission on Environmental Quality (TCEQ)  
12100 Park 35 Circle, Building C, Third Floor  
Austin, Texas 78753

Subject: Initial Air Quality Standard Permit Application  
Kodiak Generation, LLC (CN TBD)  
Kodiak\_AGR1 (RN TBD)  
Pecos, Reeves County, Texas

To whom it may concern:

On behalf of Kodiak Generation, LLC (Kodiak), Edge Engineering and Science, LLC (EDGE) is pleased to submit this application for an Initial Air Quality Standard Permit for Electric Generating Units for the proposed electric generating facility located in Pecos, Reeves County, Texas. Kodiak proposes the construction and operation of forty (40) electric generating units (EGUs) at the site. The EGUs will be used to generate electricity at the site solely to deliver electricity to the grid, as per business needs. The units will be fueled by diesel and/or renewable diesel.

As required, the following information is included with this application:

- + Appendix A: Project and Process Description;
- + Appendix B: Area Map;
- + Appendix C: Process Flow Diagram;
- + Appendix D: Emission Calculations;
- + Appendix E: TCEQ Form PI-1S and Standard Permit Checklist; and
- + Appendix F: Core Data Form.

We look forward to assisting the TCEQ during the review of this application and to obtain issuance of the Initial Standard Permit. Please contact Mr. Nick Wallace at (972) 345-2108 or by email at [NWallace@huntenergy.com](mailto:NWallace@huntenergy.com) if you should have any questions or comments.

Sincerely,  
Edge Engineering and Science, LLC

*Arijit Pakrasi*

Arijit Pakrasi, Ph.D., P.E.  
Technical Lead, Air Quality Management Services

## **APPENDIX A**

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### PROJECT AND PROCESS DESCRIPTION

## A.1 PROJECT DESCRIPTION

This Air Quality Standard Permit would authorize the construction and operation of forty (40) EGUs. The EGUs would be used to generate electricity solely for delivering to the electric grid, as per business needs.

## A.2 PROCESS DESCRIPTION

Kodiak\_AGR1 will consist of forty (40) EGUs fueled by diesel or renewable diesel fuel. The EGUs will operate a limited number of hours annually and be used to generate electricity solely for delivering to the electric grid, as per business needs. Emissions from the EGUs consist of products of combustion.

## **APPENDIX B**

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### AREA MAP



**Appendix B-1**  
**Area Map**  
Kodiak Generation, LLC  
Kodiak\_AGR1  
Pecos, Reeves County, Texas

**EDGE**  
ENGINEERING & SCIENCE

## **APPENDIX C**

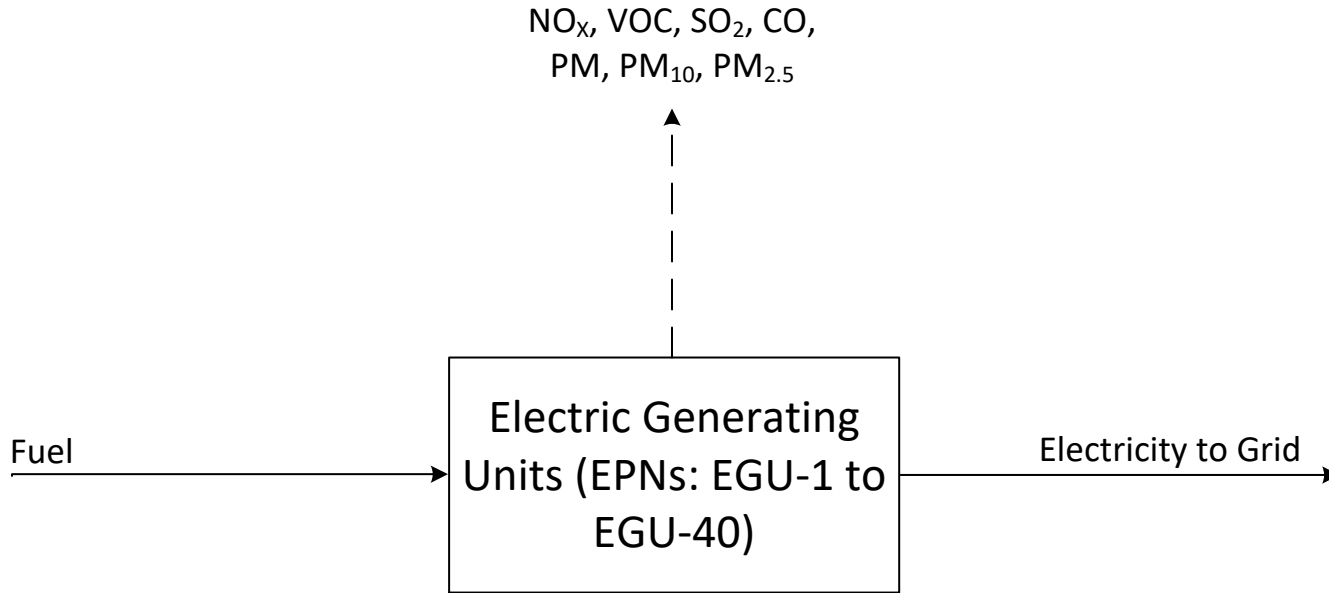
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### **PROCESS FLOW DIAGRAM**

# PROCESS FLOW DIAGRAM

## LEGEND

--> Emissions



**Figure C-1**

**Process Flow Diagram**

Kodiak Generation, LLC

Kodiak\_AGR1

Pecos, Reeves County, Texas

## **APPENDIX D**

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### EMISSION CALCULATIONS





Notes:

[1] VOC emissions factor per Vendor Data.

Emission Factor (g/kw-hr)	Emission Factors (lb/hp-hr)
0.2000	0.0003

[2] Emission factors are for Tier 2 Diesel Engines, per NSPS 40 CFR 60 Subpart IIII and 40 CFR 1042, Appendix I (Marine Engines)

Emission Factors					
(g/kw-hr)			(lb/hp-hr)		
CO	NO <sub>x</sub>	PM/PM <sub>10</sub> /PM <sub>2.5</sub>	CO	NO <sub>x</sub>	PM/PM <sub>10</sub> /PM <sub>2.5</sub>
5.00	7.60	0.27	0.0082	0.0125	0.0004

$$\frac{5 \text{ g}}{\text{kw-hr}} \times \frac{1 \text{ lb}}{453.6 \text{ g}} \times \frac{1 \text{ kw}}{1.34 \text{ hp}} = 0.0082 \text{ lb/hp-hr}$$

[3] Sulfur Dioxide (SO<sub>2</sub>) determined using the following calculation method.

Fuel Data	
Fuel Sulfur Content Maximum:	0.05%
Fuel Usage at Maximum Power (gph):	220

Fuel Sulfur Content (%) x Fuel Usage at Maximum Power (gph) x 6.943 lb/gal x 2 = lb/hr of SO<sub>2</sub>

$$\frac{0.05\%}{1 \text{ hour}} \times \frac{220 \text{ gallons}}{1 \text{ gallon}} \times \frac{7.10 \text{ pounds}^{[4]}}{1 \text{ gallon}} \times \frac{64}{32} \times \frac{\text{lb SO}_2 / \text{lb-mol SO}_2}{\text{lb S} / \text{lb-mol S}} = 1.56 \text{ lb/hr}$$

[4] Density of Diesel = 7.10 lbs/gallon

[6] Estimated Hourly Emissions = Emission Factor (lb/hr) x horsepower (hp)

[7] Estimated Annual Emissions (tpy) = (Emission Factor (lb/hr) x horsepower (hp) x Annual Hours of Operation)/2000

Conversions:

1 lb = 453.6 g

1 kw = 1.34 hp

1 gallon = 7.1 pounds<sup>[4]</sup>

1 MW = 1000 kw



## **APPENDIX E**

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### **TCEQ PI-1S WORKBOOK AND STANDARD PERMIT CHECKLIST**

**Form PI-1S**  
**Registrations for Air Standard Permit**  
**(Page 1)**  
**Texas Commission on Environmental Quality**

<b>I. Registrant Information</b>
A. Company or Other Legal Customer Name:
Kodiak Generation, LLC
B. Company Official Contact Information ( <input checked="" type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Other:)
Name: Thomas Ault
Title: Vice President - EPC
Mailing Address: 1900 N Akard Street
City: Dallas
State: TX
ZIP Code: 75201
Telephone No.: (817) 223-1203
Fax No.:
Email Address: tault@huntenergy.com
<i>All permit correspondence will be sent via email.</i>
C. Technical Contact Information ( <input checked="" type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Other:)
Name: Nick Wallace
Title: Lead Project Engineer
Company Name: Hunt Energy Network
Mailing Address: 1900 N Akard Street
City: Dallas
State: TX
ZIP Code: 75201
Telephone No.: (972) 345-2108
Fax No.:
Email Address: nwallace@huntenergy.com
<b>II. Facility and Site Information</b>
A. Name and Type of Facility
Facility Name: Kodiak_AGR1
Type of Facility: <input checked="" type="checkbox"/> Permanent <input type="checkbox"/> Temporary

**Form PI-1S**  
**Registrations for Air Standard Permit**  
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<b>II. Facility and Site Information (continued)</b>
For portable units, please provide the serial number of the equipment being authorized below.
Serial No(s): TBD
<b>B. Facility Location Information</b>
Street Address:
If there is no street address, provide written driving directions to the site and provide the closest city or town, county, and ZIP code for the site (attach description if additional space is needed).
From the intersection of Interstate 20 and County Road 409, head west on I20 for 0.6 miles. Take exit 33 toward
FM 869 and merge onto I20 Service Rd for 0.3 miles. Turn right on Ranch Rd 869 for 0.9 miles. The site will be on the
right side of the road.
City: Pecos
County: Reeves
ZIP Code: 79772
<b>C. Core Data Form (required for Standard Permits 6006, 6007, and 6013).</b>
Is the Core Data Form (TCEQ Form 10400) attached? <span style="float: right;"><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</span>
Customer Reference Number (CN): TBD
Regulated Entity Number (RN): TBD
<b>D. TCEQ Account Identification Number (if known):</b>
<b>E. Type of Action</b>
<input checked="" type="checkbox"/> Initial Application <input type="checkbox"/> Change to Registration <input type="checkbox"/> Renewal <input type="checkbox"/> Renewal Certification
For Change to Registration, Renewal, or Renewal Certification actions provide the following:
Registration Number:
Expiration Date:
<b>F. Standard Permit Claimed: 6005</b>
<b>G. Previous Standard Exemption or PBR Registration Number: N/A</b>
Is this authorization for a change to an existing facility previously authorized under a standard exemption or PBR? <span style="float: right;"><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</span>
If "Yes," enter previous standard exemption number(s) and PBR registration number(s) and associated effective date in the spaces provided below.

**Form PI-1S**  
**Registrations for Air Standard Permit**  
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<b>II. Facility and Site Information (continued)</b>
H. Other Facilities at this Site Authorized by Standard Exemption, PBR, or Standard Permit
Are there any other facilities at this site that are authorized by an Air Standard Exemption, PBR, or Standard Permit? <span style="float: right;"><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</span>
If "Yes," enter standard exemption number(s), PBR registration number(s), and Standard Permit registration number(s), and associated effective date in the spaces provided below.
Standard Exemption, PBR Registration, and Standard Permit Registration Number(s) and Effective Date(s)
I. Other Air Preconstruction Permits
Are there any other air preconstruction permits at this site? <span style="float: right;"><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</span>
If "Yes," enter permit number(s) in the spaces provided below.
J. Affected Air Preconstruction Permits
Does the standard permit directly affect any permitted facility? <span style="float: right;"><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</span>
If "Yes," enter permit number(s) in the spaces provided below.
K. Federal Operating Permit (FOP) Requirements
Is this facility located at a site that is required to obtain a FOP pursuant to 30 TAC Chapter 122? <span style="float: right;"><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> To Be Determined</span>
Check the requirements of 30 TAC Chapter 122 that will be triggered if this standard permit is approved ( <i>check all that apply</i> ).
<input checked="" type="checkbox"/> Initial Application for a FOP <input type="checkbox"/> Significant Revision for a SOP <input type="checkbox"/> Minor Revision for a SOP
<input type="checkbox"/> Operational Flexibility/Off Permit Notification for a SOP <input type="checkbox"/> Revision for a GOP
<input type="checkbox"/> To be Determined <input type="checkbox"/> None
Identify the type(s) of FOP issued and/or FOP application(s) submitted/pending for the site. ( <i>check all that apply</i> )
<input type="checkbox"/> SOP <input type="checkbox"/> GOP <input type="checkbox"/> GOP application/revision (submitted or under APD review) <input checked="" type="checkbox"/> N/A
<input type="checkbox"/> SOP application/revision (submitted or under APD review)

**Form PI-1S**  
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<b>III. Fee Information (go to <a href="http://www.tceq.texas.gov/epay">www.tceq.texas.gov/epay</a> to pay online)</b>	
A.	Fee Amount: \$900
B.	Voucher number from ePay: Paid via STEERS
<b>IV. Public Notice (if applicable)</b>	
A.	Responsible Person ( <input type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Other: _____)
	Name:
	Title:
	Company:
	Mailing Address:
	City:
	State:
	ZIP Code:
	Telephone No.:
	Fax No.:
	Email Address:
B.	Technical Contact ( <input type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Other: _____)
	Name:
	Title:
	Company:
	Mailing Address:
	City:
	State:
	ZIP Code:
	Telephone No.:
	Fax No.:
	Email Address:
C.	<b>Bilingual Notice</b>
	Is a bilingual program required by the Texas Education Code in the School District? <span style="float: right;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span>
	Are the children who attend either the elementary school or the middle school closest to your facility eligible to be enrolled in a bilingual program provided by the district? <span style="float: right;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span>

**Form PI-1S**  
**Registrations for Air Standard Permit**  
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<b>IV. Public Notice (continued) (if applicable) (continued)</b>	
If "Yes," list which language(s) are required by the bilingual program below?	
<b>D. Small Business Classification and Alternate Public Notice</b>	
Does this company (including parent companies and subsidiary companies) have fewer than 100 employees or less than \$6 million in annual gross receipts?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Is the site a major source under 30 TAC Chapter 122, Federal Operating Permit Program?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the site emissions of any individual regulated air contaminant equal to or greater than 50 tpy?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the site emissions of all regulated air contaminant combined equal to or greater than 75 tpy?	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>V. Renewal Certification Option</b>	
A. Does the permitted facility emit an air contaminant on the Air Pollutant Watch List, and is the permitted facility located in an area on the watch list?	<input type="checkbox"/> Yes <input type="checkbox"/> No
B. For facilities participating in the Houston/Galveston/Brazoria area (HGB) cap and trade program for highly reactive VOCs (HRVOCs), do the HRVOCs need to be speciated on the maximum allowable emission rates table (MAERT)?	<input type="checkbox"/> Yes <input type="checkbox"/> No
C. Does the company and/or site have an unsatisfactory compliance history?	<input type="checkbox"/> Yes <input type="checkbox"/> No
D. Are there any applications currently under review for this standard permit registration?	<input type="checkbox"/> Yes <input type="checkbox"/> No
E. Are scheduled maintenance, startup, or shutdown emissions required to be included in the standard permit registration at this time?	<input type="checkbox"/> Yes <input type="checkbox"/> No
F. Are any of the following actions being requested at the time of renewal:	<input type="checkbox"/> Yes <input type="checkbox"/> No
1. Are there any facilities that have been permanently shutdown that are proposed to be removed from the standard permit registration?	<input type="checkbox"/> Yes <input type="checkbox"/> No
2. Do changes need to be made to the standard permit registration in order to remain in compliance?	<input type="checkbox"/> Yes <input type="checkbox"/> No
3. Are sources or facilities that have always been present and represented, but never identified in the standard permit registration, proposed to be included with this renewal?	<input type="checkbox"/> Yes <input type="checkbox"/> No
4. Are there any changes to the current emission rates table being proposed?	<input type="checkbox"/> Yes <input type="checkbox"/> No
<i>Note: If answers to all of the questions in Section V. Renewal Certification Option are "No," use the certification option and skip to Section VII. of this form. If the answers to any of the questions in Section V. Renewal Certification Option are "Yes," the certification option <b>cannot</b> be used.</i>	
*If notice is applicable and comments are received in response to the public notice, the application does not qualify for the renewal certification option.	

**Form PI-1S**  
**Registrations for Air Standard Permit**  
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<b>VI. Technical Information Including State and Federal Regulatory Requirements</b>	
<p><b>Place a check next to the appropriate box to indicate what you have included in your submittal.</b>  <i>Note: Any technical or essential information needed to confirm that facilities are meeting the requirements of the standard permit must be provided. Not providing key information could result in an automatic deficiency and voiding of the project.</i></p>	
<p>A. Standard Permit requirements            (Checklists are optional; however, your review will go faster if you provide applicable checklists.)</p>	
Did you demonstrate that the general requirements in 30 TAC Sections 116.610 and 116.615 are met?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Did you demonstrate that the individual requirements of the specific standard permit are met?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
B. Confidential Information (All pages properly marked "CONFIDENTIAL").	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C. Process Flow Diagram.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
D. Process Description.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
E. Maximum Emissions Data and Calculations.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
F. Plot Plan.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
G. Projected Start Of Construction Date, Start Of Operation Date, and Length of Time at Site:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Projected Start of Construction (provide date): 03/01/2026	
Projected Start of Operation (provide date): 06/01/2026	
Length of Time at the Site: N/A	
<b>VII. Delinquent Fees and Penalties</b>	
<p>This form <b>will not be processed</b> until all delinquent fees and/or penalties owed to the TCEQ or the Office of the Attorney General on behalf of the TCEQ are paid in accordance with the Delinquent Fee and Penalty Protocol. For more information regarding Delinquent Fees and Penalties, go to the TCEQ website at: <a href="http://www.tceq.texas.gov/agency/financial/fees/delin/index.html">www.tceq.texas.gov/agency/financial/fees/delin/index.html</a>.</p>	

**Form PI-1S**  
**Registrations for Air Standard Permit**  
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**Texas Commission on Environmental Quality**

**VIII. Signature Requirements**

The signature below confirms that I have knowledge of the facts included in this application and that these facts are true and correct to the best of my knowledge and belief. I further state that to the best of my knowledge and belief, the project for which application is made will not in any way violate any provision of the Texas Water Code (TWC), Chapter 7; the Texas Health and Safety Code, Chapter 382, the Texas Clean Air Act (TCAA) the air quality rules of the Texas Commission on Environmental Quality; or any local governmental ordinance or resolution enacted pursuant to the TCAA. I further state that I understand my signature indicates that this application meets all applicable nonattainment, prevention of significant deterioration, or major source of hazardous air pollutant permitting requirements. The signature further signifies awareness that intentionally or knowingly making or causing to be made false material statements or representations in the application is a criminal offense subject to criminal penalties.

Name (printed): Nick Wallace

Signature (original signature required): Signed via STEERS

Date: 10/11/2024

**IX. Copies of the Registration**

The PI-1S application must be submitted through ePermits. No additional copies need to be sent to the Regional Office or local Air Pollution Control Program(s). The link to ePermits can be found here: [www3.tceq.texas.gov/steers/](http://www3.tceq.texas.gov/steers/).

**Texas Commission on Environmental Quality**  
**Air Quality Standard Permits**  
**General Requirements Checklist**  
**Title 30 Texas Administrative Code §§116.610-116.615**

Check the most appropriate answer and include any additional information in the spaces provided. If additional space is needed, please include an extra page and reference the rule number. The SP forms, tables, checklists, and guidance documents are available from the TCEQ, Air Permits Division web site at:  
[www.tceq.texas.gov/permitting/air/nav/standard.html](http://www.tceq.texas.gov/permitting/air/nav/standard.html).

Most Standard Permits require registration with the commission's Office of Permitting, Remediation, and Registration in Austin. The facilities and/or changes to facilities can be registered by completing a [Form PI-1S](#), "Registration for Air Standard Permit." This checklist should accompany the registration form to expedite any registration review.

<b>CHECK THE MOST APPROPRIATE ANSWERS AND FILL IN THE REQUESTED INFORMATION</b>		
<b>Rule</b>	<b>Questions/Description</b>	<b>Response</b>
116.610(a)(1)	Are there net emissions increases associated with this registration?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
	<i>If "YES," will net emission increases of air contaminants from the project, other than those for which a National Ambient Air Quality Standard (NAAQS) has been established, meet the emission limits of § 106.261 or § 106.262?</i>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
	<i>If "NO," does the specific standard permit exempt emissions from this limit?</i>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
Attach emissions summary and calculations: HAP Emissions from Diesel Generators (Appendix D)		
116.610(a)(3)	Do any of the Title 40 Code of Federal Regulations Part (CFR) 60, New Source Performance Standards apply to this registration?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
<i>If "YES," list subparts: 40 CFR 60 Subpart IIII</i>		
116.610 (a)(4)	Do any Hazardous Air Pollutant requirements apply to this registration?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
<i>If "YES," list subparts</i>		
116.610 (a)(5)	Do any maximum achievable control technology (MACT) standards as listed under 40 CFR Part 63 or Chapter 113, Subchapter C (National Emissions Standard for Hazardous Air for Source Categories) apply to this registration?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
<i>If "YES," list subparts: 40 CFR 60 Subpart ZZZZ</i>		
116.610(a)(6)	Will additional emission allowances under Chapter 101, Subchapter H, Division 3, Emissions Banking and Trading, need to be obtained following this registration?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
116.611(a)(1-6)	Is the following documentation included with this registration:	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
	Emissions calculations including the basis of the calculations?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
	Quantification of all emission increases and/or decreases associated with this project?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
	Sufficient information demonstrating that this project does not trigger PSD or NNSR review?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
	Description of efforts to minimize collateral emissions increases associated with this project?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
	Process descriptions including related processes?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
	Description of any equipment being installed?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO

**Texas Commission on Environmental Quality  
Air Quality Standard Permits  
General Requirements Checklist  
Title 30 Texas Administrative Code §§116.610-116.615**

<b>Rule</b>	<b>Question/Description</b>	<b>Response</b>
116.614	Are the required fee and a copy of the check or money order provided with the application?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
116.615(1)	Will emissions from the facility comply with all applicable rules and regulations of the commission adopted under Texas Health and Safety Code, Chapter 382, and with the intent of the Texas Clean Air Act?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
116.615(2)	Do you understand that all representations with regard to construction plans, operating procedures, and maximum emission rates in this registration become conditions upon which the facility will be constructed and operated?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
116.615(3)	Do you understand that all changes authorized by this registration need to be incorporated into the facility's permit if the facility is currently permitted under §116.110 (relating to Applicability)?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
<i>List all related permit numbers:</i>		
116.615(9)617(e)(1)	Will all air pollution emission capture and abatement equipment be maintained in good working order?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
116.615(10)	Will the facility comply with all applicable rules and regulations of the TCEQ, the Texas Health and Safety Code, Chapter 382, and the Texas Clean Air Act?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO

**Save Form**

**Reset Form**

## Air Quality Standard Permit for Electric Generating Units

*Effective Date May 16, 2007*

This standard permit authorizes electric generating units that generate electricity for use by the owner or operator and/or generate electricity to be sold to the electric grid, and that meet all of the conditions listed below.

### (1) Applicability

- (A) This standard permit may be used to authorize electric generating units installed or modified after the effective date of this standard permit and that meet the requirements of this standard permit.

***Kodiak proposes to install forty (40) electric generating units (EGUs) after the effective date, May 16, 2007, therefore the Standard Permit can be used for authorizing these units.***

- (B) This standard permit may not be used to authorize boilers. Boilers may be authorized under the Air Quality Standard Permit for Boilers; 30 TAC § 106.183, Boilers, Heaters, and Other Combustion Devices; or a permit issued under the requirements of 30 TAC Chapter 116.

***The site will not have boilers.***

### (2) Definitions

- (A) East Texas Region - All counties traversed by or east of Interstate Highway 35 or Interstate Highway 37, including Bosque, Coryell, Hood, Parker, Somervell and Wise Counties.

***The site will be located in Reeves County, west of Interstate Highway 35 and Interstate Highway 37, therefore the site is not applicable to requirements associated with the East Texas Region.***

- (B) Installed - a generating unit is installed on the site when it begins generating electricity.
- (C) West Texas Region - Includes all of the state not contained in the East Texas Region.

***The site will be located in Reeves County, west of Interstate Highway 35 and Interstate Highway 37, therefore the site will be applicable to requirements associated with the West Texas Region.***

- (D) Renewable fuel - fuel produced or derived from animal or plant products, byproducts or wastes, or other renewable biomass sources, excluding fossil fuels. Renewable fuels may include, but are not limited to, ethanol, biodiesel, and biogas fuels.

(3) Administrative Requirements

- (A) Electric generating units shall be registered in accordance with 30 TAC § 116.611, Registration to Use a Standard Permit, using a current Form PI-1S. Units that meet the conditions of this standard permit do not have to meet 30 TAC § 116.610(a)(1), Applicability.

***A current Form PI-1S is included in Appendix E of this application.***

- (B) Registration applications shall comply with 30 TAC § 116.614, Standard Permit Fees, for any single unit or multiple units at a site with a total generating capacity of 1 megawatt (MW) or greater. The fee for units or multiple units with a total generating capacity of less than 1 MW at a site shall be \$100.00. The fee shall be waived for units or multiple units with a total generating capacity of less than 1 MW at a site that have certified nitrogen oxides (NO<sub>x</sub>) emissions that are less than 10 percent of the standards required by this standard permit.

***The Standard Permit Fee of \$900 has been paid via STEERS.***

- (C) No owner or operator of an electric generating unit shall begin construction and/or operation without first obtaining written approval from the executive director.

***Kodiak proposes to begin construction March 2026, and operation June 2026, or following the issuance of this Standard Permit.***

- (D) Records shall be maintained and provided upon request to the Texas Commission on Environmental Quality (TCEQ) for the following:

- (i) Hours of operation of the unit;
- (ii) Maintenance records, maintenance schedules, and/or testing reports for the unit to document re-certification of emission rates as required by subsection (4)(G) below; and
- (iii) Records to document compliance with the fuel sulfur limits in subsection (4)(C).

***Kodiak will maintain the required records and provide them upon request to the TCEQ.***

- (E) Electric generators powered by gas turbines must meet the applicable conditions, including testing and performance standards, of Title 40 Code of Federal Regulations (CFR) Part 60, Subpart GG, Standards of Performance for Stationary Gas Turbines, and applicable requirements of 40 CFR Part 60 Subpart KKKK, Standards of Performance for Stationary Combustion Turbines.

***The EGUs on-site will not be powered by gas turbines, therefore, the site is not covered by the requirements of Subpart GG and Subpart KKKK.***

- (F) Compliance with this standard permit does not exempt the owner or operator from complying with any applicable requirements of 30 TAC Chapter 117, Control of Air Pollution from Nitrogen Compounds, or 30 TAC Chapter 114, Control of Air Pollution from Motor Vehicles.

***There are no requirements in Chapter 117 or Chapter 114 that would apply to this site.***

(4) General Requirements

- (A) Emissions of NO<sub>x</sub> from the electric generating unit shall be certified by the manufacturer or by the owner or operator in pounds of pollutant per megawatt hour (lb/MWh). This certification must be displayed on the name plate of the unit or on a label attached to the unit. Test results from U.S. Environmental Protection Agency (EPA) reference methods, California Air Resources Board methods, or equivalent alternative testing methods approved by the executive director used to verify this certification shall be provided upon request to the TCEQ. The unit must operate on the same fuel(s) for which the unit was certified.

***The facility will conform to this requirement.***

- (B) Electric generating units that use combined heat and power (CHP) may take credit for the heat recovered from the exhaust of the combustion unit to meet the emission standards in subsections (4)(D), (4)(E), and (4)(F). Credit shall be at the rate of one MWh for each 3.4 million British Thermal Units of heat recovered. The following requirements must be met to take credit for CHP for units not sold and certified as an integrated package by the manufacturer:
  - (i) The owner or operator must provide as part of the application documentation of the heat recovered, electric output, efficiency of the generator alone, efficiency of the generator including CHP, and the use for the non-electric output, and
  - (ii) The heat recovered must equal at least 20 percent of the total energy output of the CHP unit.

***The EGUs will not be using CHP, therefore this section is not applicable to the site.***

- (C) Fuels combusted in these electric generating units are limited to:
- (i) Natural gas containing no more than ten grains total sulfur per 100 dry standard cubic feet;
  - (ii) Landfill gas, digester gas, stranded oilfield gas, or gaseous renewable fuel containing no more than 30 grains total sulfur per 100 dry standard cubic feet; or
  - (iii) Liquid fuels (including liquid renewable fuel) not containing waste oils or solvents and containing less than 0.05 percent by weight sulfur.

***Kodiak proposes to operate the EGUs using diesel and/or renewable diesel fuel.***

- (D) Except as provided in subsections (4)(F) and (4)(H), NO<sub>x</sub> emissions for units 10 MW or less shall meet the following limitations based upon the date the unit is installed and the region in which it operates:

East Texas Region:

- (i) Units installed prior to January 1, 2005 and
  - (a) operating more than 300 hours per year - 0.47 lb/MWh;
  - (b) operating 300 hours or less per year - 1.65 lb/MWh;
- (ii) Units installed on or after January 1, 2005 and
  - (a) operating more than 300 hours per year, with a capacity greater than 250 kilowatts (kW) - 0.14 lb/MWh;
  - (b) operating 300 hours or less per year - 0.47 lb/MWh; or
  - (c) any unit with a capacity of 250 kW or less - 0.47 lb/MWh.

West Texas Region:

- (i) Units operating more than 300 hours per year - 3.11 lb/MWh;
- (ii) Units operating 300 hours or less per year - 21 lb/MWh. Units certified to comply with applicable Tier 1, 2, or 3 emission standards in 40 CFR Part 89, Control of Emissions from New and In-Use Nonroad Compression-Ignition Engines, are deemed to satisfy this emission limit.

***The site will be located in Reeves County, west of Interstate Highway 35 and Interstate Highway 37, therefore the site will comply with the NO<sub>x</sub> emissions limitations for the West Texas Region for units operating 300 hours or less per year. See Appendix D for detailed emissions calculations.***

(E) Except as provided in subsections (4)(F) and (4)(H), NO<sub>x</sub> emissions for units greater than 10 MW shall meet the following limitations:

(i) Units operating more than 300 hours per year - 0.14 lb/MWh;

(ii) Units operating 300 hours or less per year - 0.38 lb/MWh.

***The forty (40) EGUs at the site are all less than 10 MW.***

(F) Electric generating units firing any gaseous or liquid fuel that is at least 75 percent landfill gas, digester gas, stranded oil field gas, or renewable fuel content by volume, shall meet a NO<sub>x</sub> emission limit of 1.90 lb/MWh. Units in West Texas with a capacity of 10 MW or less that fire at least 75 percent landfill gas, digester gas, stranded oilfield gases, or gaseous or liquid renewable fuel by volume, must comply with the applicable West Texas NO<sub>x</sub> limit in subsection (4)(D).

***The units at the site will conform to the requirements for EGU units less 10 MW in West Texas fired by liquid fuel.***

(G) To ensure continuing compliance with the emissions limitations, the owner or operator shall re-certify a unit every 16,000 hours of operation, but no less frequently than every three years. Re-certification may be accomplished by following a maintenance schedule that the manufacturer certifies will ensure continued compliance with the required NO<sub>x</sub> standard or by third party testing of the unit using appropriate EPA reference methods, California Air Resources Board methods, or equivalent alternative testing methods approved by the executive director to demonstrate that the unit still meets the required emission standards. After re-certification, the unit must operate on the same fuel(s) for which the unit was re-certified.

***Kodiak will comply with this section and re-certify each EGU every 16,000 hours or three (3) years, whichever is sooner.***

(H) The NO<sub>x</sub> emission limits in subsections (4)(D)-(4)(F) are subject to the following exceptions:

(i) The hourly NO<sub>x</sub> emission limits do not apply at times when the ambient air temperature at the location of the unit is less than 0 degrees Fahrenheit.

(ii) At times when a unit is operating at less than 80% of rated load, an alternative NO<sub>x</sub> emission standard for that unit may be determined by multiplying the applicable emission standard in subsections (4)(D)-(4)(F) by the rated load of the EGU (in MW), to produce an allowable hourly mass NO<sub>x</sub> emission rate. In order to use this alternative standard, an owner or operator must maintain records that demonstrate compliance with the alternative emission standard, and make such records available to the TCEQ or any local air pollution control agency with jurisdiction upon request.

## **APPENDIX F**

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### **CORE DATA FORM**



# TCEQ Core Data Form

For detailed instructions on completing this form, please read the Core Data Form Instructions or call 512-239-5175.

## SECTION I: General Information

<b>1. Reason for Submission</b> (If other is checked please describe in space provided.)		
<input checked="" type="checkbox"/> New Permit, Registration or Authorization (Core Data Form should be submitted with the program application.)		
<input type="checkbox"/> Renewal (Core Data Form should be submitted with the renewal form)	<input type="checkbox"/> Other	
<b>2. Customer Reference Number</b> (if issued)	<a href="#">Follow this link to search for CN or RN numbers in Central Registry**</a>	<b>3. Regulated Entity Reference Number</b> (if issued)
CN		RN

## SECTION II: Customer Information

<b>4. General Customer Information</b>		<b>5. Effective Date for Customer Information Updates</b> (mm/dd/yyyy)	
<input checked="" type="checkbox"/> New Customer		<input type="checkbox"/> Update to Customer Information	
<input type="checkbox"/> Change in Legal Name (Verifiable with the Texas Secretary of State or Texas Comptroller of Public Accounts)		<input type="checkbox"/> Change in Regulated Entity Ownership	
<i>The Customer Name submitted here may be updated automatically based on what is current and active with the Texas Secretary of State (SOS) or Texas Comptroller of Public Accounts (CPA).</i>			
<b>6. Customer Legal Name</b> (If an individual, print last name first: eg: Doe, John)		<i>If new Customer, enter previous Customer below:</i>	
Kodiak Generation, LLC			
<b>7. TX SOS/CPA Filing Number</b>	<b>8. TX State Tax ID</b> (11 digits)	<b>9. Federal Tax ID</b> (9 digits)	<b>10. DUNS Number</b> (if applicable)
0805521432	32094779157	85-1989040	
<b>11. Type of Customer:</b>	<input checked="" type="checkbox"/> Corporation	<input type="checkbox"/> Individual	Partnership: <input type="checkbox"/> General <input checked="" type="checkbox"/> Limited
Government: <input type="checkbox"/> City <input type="checkbox"/> County <input type="checkbox"/> Federal <input type="checkbox"/> Local <input type="checkbox"/> State <input type="checkbox"/> Other	<input type="checkbox"/> Sole Proprietorship	<input type="checkbox"/> Other:	
<b>12. Number of Employees</b>		<b>13. Independently Owned and Operated?</b>	
<input checked="" type="checkbox"/> 0-20 <input type="checkbox"/> 21-100 <input type="checkbox"/> 101-250 <input type="checkbox"/> 251-500 <input type="checkbox"/> 501 and higher		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
<b>14. Customer Role</b> (Proposed or Actual) – as it relates to the Regulated Entity listed on this form. Please check one of the following			
<input type="checkbox"/> Owner <input type="checkbox"/> Operator <input checked="" type="checkbox"/> Owner & Operator <input type="checkbox"/> Other:			
<input type="checkbox"/> Occupational Licensee <input type="checkbox"/> Responsible Party <input type="checkbox"/> VCP/BSA Applicant			
<b>15. Mailing Address:</b>	1900 N Akard Street		
<b>City</b>	Dallas	<b>State</b>	TX
<b>ZIP</b>	75201	<b>ZIP + 4</b>	
<b>16. Country Mailing Information</b> (if outside USA)		<b>17. E-Mail Address</b> (if applicable)	
		tault@huntenergy.com	

<b>18. Telephone Number</b>	<b>19. Extension or Code</b>	<b>20. Fax Number (if applicable)</b>
( 817 ) 223-1203		( ) -

### SECTION III: Regulated Entity Information

<b>21. General Regulated Entity Information</b> (If "New Regulated Entity" is selected, a new permit application is also required.)							
<input checked="" type="checkbox"/> New Regulated Entity <input type="checkbox"/> Update to Regulated Entity Name <input type="checkbox"/> Update to Regulated Entity Information							
<i>The Regulated Entity Name submitted may be updated, in order to meet TCEQ Core Data Standards (removal of organizational endings such as Inc, LP, or LLC).</i>							
<b>22. Regulated Entity Name</b> (Enter name of the site where the regulated action is taking place.)							
Kodiak_AGR1							
<b>23. Street Address of the Regulated Entity:</b> <i>(No PO Boxes)</i>							
	City		State		ZIP		ZIP + 4
<b>24. County</b>	Reeves County						

If no Street Address is provided, fields 25-28 are required.

<b>25. Description to Physical Location:</b>	From the intersection of Interstate 20 and County Road 409, head west on I20 for 0.6 miles. Take exit 33 toward FM 869 and merge onto I20 Service Rd for 0.3 miles. Turn right on Ranch Rd 869 for 0.9 miles. The site will be on the right side of the road.						
<b>26. Nearest City</b>					<b>State</b>	<b>Nearest ZIP Code</b>	
Pecos					TX	79772	
<i>Latitude/Longitude are required and may be added/updated to meet TCEQ Core Data Standards. (Geocoding of the Physical Address may be used to supply coordinates where none have been provided or to gain accuracy).</i>							
<b>27. Latitude (N) In Decimal:</b>		31.3965			<b>28. Longitude (W) In Decimal:</b>		-103.6271
Degrees	Minutes	Seconds	Degrees	Minutes	Seconds		
31	23	47.6	103	37	37.6		
<b>29. Primary SIC Code</b>	<b>30. Secondary SIC Code</b>		<b>31. Primary NAICS Code</b>		<b>32. Secondary NAICS Code</b>		
(4 digits)	(4 digits)		(5 or 6 digits)		(5 or 6 digits)		
4911			22111				
<b>33. What is the Primary Business of this entity?</b> (Do not repeat the SIC or NAICS description.)							
Operations and Asset Management							
<b>34. Mailing Address:</b>	1900 N Akard Street						
	City	Dallas	State	TX	ZIP	75201	ZIP + 4
<b>35. E-Mail Address:</b>	tault@huntenergy.com						
<b>36. Telephone Number</b>	<b>37. Extension or Code</b>			<b>38. Fax Number (if applicable)</b>			
( 817 ) 223-1203				( ) -			

**39. TCEQ Programs and ID Numbers** Check all Programs and write in the permits/registration numbers that will be affected by the updates submitted on this form. See the Core Data Form instructions for additional guidance.


<input type="checkbox"/> Dam Safety	<input type="checkbox"/> Districts	<input type="checkbox"/> Edwards Aquifer	<input type="checkbox"/> Emissions Inventory Air	<input type="checkbox"/> Industrial Hazardous Waste
<input type="checkbox"/> Municipal Solid Waste	<input checked="" type="checkbox"/> New Source Review Air	<input type="checkbox"/> OSSF	<input type="checkbox"/> Petroleum Storage Tank	<input type="checkbox"/> PWS
<input type="checkbox"/> Sludge	<input type="checkbox"/> Storm Water	<input type="checkbox"/> Title V Air	<input type="checkbox"/> Tires	<input type="checkbox"/> Used Oil
<input type="checkbox"/> Voluntary Cleanup	<input type="checkbox"/> Wastewater	<input type="checkbox"/> Wastewater Agriculture	<input type="checkbox"/> Water Rights	<input type="checkbox"/> Other:

**SECTION IV: Preparer Information**

<b>40. Name:</b>	Arijit Pakrasi	<b>41. Title:</b>	Technical Lead
<b>42. Telephone Number</b>	<b>43. Ext./Code</b>	<b>44. Fax Number</b>	<b>45. E-Mail Address</b>
( 832 ) 772-3009		( ) -	apakrasi@edge-es.com

**SECTION V: Authorized Signature**

46. By my signature below, I certify, to the best of my knowledge, that the information provided in this form is true and complete, and that I have signature authority to submit this form on behalf of the entity specified in Section II, Field 6 and/or as required for the updates to the ID numbers identified in field 39.

<b>Company:</b>	Kodiak Generation, LLC	<b>Job Title:</b>	EPC Director
<b>Name (In Print):</b>	Thomas Ault	<b>Phone:</b>	( 817 ) 223- 1203
<b>Signature:</b>		<b>Date:</b>	10/11/2024