

Electric Generating Unit Standard Permit Technical Review


Company	Ho Clarke Generating, LLC	Registration Number	153484
City	Houston	Project Number	389485
County	Harris	Regulated Entity Number	RN110947363
Project Type	Standard Permit Application	Customer Reference Number	CN605746494
Project Reviewer	Thomas Greinert	Project Received Date	February 27, 2025
Site Name	Ho Clarke Generating		

Project Description
Ho Clarke Generating, LLC. owns and operates the Proenergy South Houston Plant in Houston, Harris County, Texas. The site is comprised of eight natural gas-fired simple cycle combustion turbine generators and ancillary equipment. The site will produce 400MW of electric power. This revision is to authorize up to 250 hours per year of peak firing during times of very high demand, and the associated emission increases. This will occur during times that the turbines would be operating already, therefore there will be no increase in total annual operating hours. The turbines are subject to NSPS KKKK and will comply with applicable requirements. The site has an active Title V Permit (Permit O4105).

Compliance History Evaluation	
A compliance history report was reviewed on:	March 6, 2025
Site rating & classification:	0.00 / High
Company rating & classification:	0.00 / High
If site was rated unsatisfactory, what action(s) occurred as a result: (i.e. changes to permit, reduced renewal period, etc.)	N/A

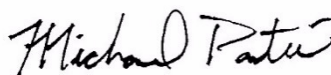
General Rules Check	Comments
Does the project trigger PSD or NA review?	* No
Is the facility taking an operational limit to meet the Standard Permit? If yes, describe how this project is not circumventing major NSR permitting. (30 TAC §116.110)	* No

Standard Permit Rules Check	Comments
Type of unit being authorized	*Turbine(s)
Fees	* ≥ 1 MW \$900
Combined Heat and Power (if taking credit)	N/A
Fuel	* Natural gas (<10 grains total sulfur per 100 dscf)
NO _x emission limitation (in lb/MWh)	* ≤10 MW per unit * East Texas * >300 hrs/yr – 0.14 lb/MWhr
Maintenance, Startup, and Shutdown	Maintenance activities will be authorized either by PBR or De Minimis. Emissions from planned startup and shutdown will be authorized by this permit. Combustion emission factors used when developing the standard permit included enough conservatism to account for incidental increases that could occur during startup and shutdown.



3/10/2025

Project Reviewer
Thomas Greinert



3/11/2025

Section Manager
Michael Partee