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		3/11/2025	
Project Reviewer Thomas Greinert	Date	Section Manager Michael Partee	Date