



May 29, 2025

Texas Commission on Environmental Quality
Air Permits Initial Review Team (APIRT), MC 161
PO Box 13087
Austin, Texas 78711-3087

SUBJECT

PI-1S Package
Nexus Hubbard Power, LLC
The Woodlands, Texas
Regulated Entity Reference Number: Not yet assigned
Customer Number: Not yet assigned

Dear Rules and Registrations Section:

Nexus Hubbard Power, LLC (Nexus) is proposing to own and operate lean-burn natural gas fired engines to generate electricity primarily in support of data center operations located at 880 State Highway 171, Hubbard, Texas (facility). With the enclosed registration of emission limits application (application), Nexus proposes the construction of the following:

- Thirty (30) 20,431 kilowatt-electric (kWe) MAN 18V51/60G generators as NHP-GEN1 – NHP-GEN30

The proposed new electric generating units (EGUs) will be used to provide a total generating capacity for the site of 612.93MW (30 x 20.431MW). Once registered and certified under the 6005 Air Quality Standard Permit for EGUs, they will provide baseload power to support data center operations. These natural gas generators are not classified as “named major sources” per 40 CFR 52.21(b)(1)(i)(a) since they are not “steam electric plants”. In parallel with this submittal, a registration under the Texas Commission on Environmental Quality (TCEQ) Permit by Rules (PBRs) Title 30 Texas Administrative Code (TAC 30) 106.511 and 106.472 for certification of 152.75MW of emergency diesel power generation, associated diesel tanks and has been submitted. Nexus understands that the potential to emit (PTE) levels represented in both registrations will require applications for Title V operating permits prior to operations.

For the purposes of aggregation of PTE at this location, the below table indicates facility-wide PTE for each pollutant calculated from the baseload electric generating units (NHP-GEN1 – NHP-GEN45), the emergency diesel generating units (NHP-EGEN1 – NHP-EGEN47) and diesel tanks (NHP-DT1 – NHP-DT4).



Facility Wide Emissions Summary

Pollutant	PTE (tpy)			Facility-wide
	NHP-GEN1 – NHP-GEN30	NHP-EGEN1 – NHP-EGEN47	NHP-DT1 – NHP-DT4	
NO _x	236.48	11.30	--	247.78
CO	205.03	10.10	--	215.14
VOC	213.22	3.13	0.04	216.39
PM ₁₀ / PM _{2.5}	93.19	0.53	--	93.73
SO ₂	15.07	0.06	--	15.13
Combined HAP	132.35	1.14	--	133.49

Notes:

1. Emissions details for NHP-EGEN1 – NHP-EGEN47 are available in the parallel registration with TCEQ of these emergency diesel generators under PBR 106.4 and 106.511.
2. Emissions details for NHP-DT1 – NHP-DT4 are available in the parallel registration with TCEQ of these diesel tanks under PBR 106.472.
3. Combined HAP (tpy) for NHP-GEN1 – NHP-GEN30 is estimated by comparing the vendor-provided calculated emissions of formaldehyde (tpy) to the same formaldehyde emissions calculated using EPA AP-42 Table 3.2-2 emission factors for formaldehyde and then applying this same reduction ratio (90.3%) for all HAPs. This estimated quantity makes sense because Combined HAP cannot exceed total VOC in tpy, which is what would be indicated if only EPA AP-42 emissions factors are used.

With this application, Nexus has included the following documents:

- Appendix A: PI-1S Form and TCEQ Core Data Form 10400;
- Appendix B: Table 1(a) TCEQ Form 10153;
- Appendix C: Table 29 Reciprocating Engines TCEQ Form 10195;
- Appendix D: Detailed emissions calculations (CONFIDENTIAL);
- Appendix E: Engine manufacturer specifications; and
- Appendix F: Process Flow Diagram, Plot Plan and UTM Coordinates.

If you have any questions regarding this submittal or require additional information, please contact me on (201) 455-4743.

Sincerely,

Jerry Schafer
 Director of Regulatory Affairs & Permitting
 Nexus Hubbard Power