

Electric Generating Unit Standard Permit Technical Review

Company	RPC Merchant LLC	Registration Number	180360
City	Pyote	Project Number	393813
County	Ward	Regulated Entity Number	RN112223318
Project Type	Standard Permit Application	Customer Reference Number	CN606291433
Project Reviewer	Jana Banigo	Project Received Date	May 30, 2025
Site Name	Staghorn Facility		

Project Description
<p>RPC Merchant, LLC (RPC) submitted an application to authorize three 4.5-Megawatt (MW) Jenbacher (Model: J624) at their Staghorn Facility located in Pyote, Ward County, Texas. The sitewide total is 13.5 MW.</p> <p>The engines (EPN: EGU1, EGU2, and EGU3) will be used to generate and provide non-emergency electrical power to oil and gas operations and to the electrical grid. Each engine will be fired with pipeline-quality natural gas with a sulfur content of 10 grains per one hundred standard cubic feet (gr/100 scf) or less. Other sources of emissions include fugitive emissions.</p> <p>RPC indicates that a separate Title V (FOP) application will be submitted. RPC also indicates that each engine will comply with NSPS JJJJ.</p> <p>A detailed process description, project description, Table 29 for each engine, emission calculations, and additional supporting documentation is located in the public file.</p>

Compliance History Evaluation	
A compliance history report was reviewed on:	July 3, 2025
Site rating & classification:	N/A
Company rating & classification:	Unclassified
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	*Engine(s)
Fees	* ≥ 1 MW \$900
Combined Heat and Power (if taking credit)	N/A – The EGUs will not use combined heat or power.
Fuel	* Natural gas (<10 grains total sulfur per 100 dscf)
NO _x emission limitation (in lb/MWh)	* ≤10 MW per unit * West Texas *>300 hrs/yr – 3.11 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.

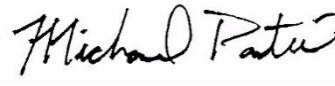
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July 3, 2025



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Project Reviewer
Jana Banigo

Date

Section Manager
Michael Partee

Date