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June 26, 2025

Texas Commission on Environmental Quality (TCEQ)
via STEERS

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

RE: Standard Permit Application for Electric Generating Units
Pacifico Spunky LLC – Johnson County, Texas
TCEQ Customer Reference Number: TBA
Regulated Entity Number: TBA

To Whom It May Concern:

Pacifico Spunky LLC (Pacifico) is proposing to construct a natural gas-fired power plant located at 5200 FM 2174, Cleburne, Texas 76033. Pacifico has not yet received a Texas Commission on Environmental Quality (TCEQ) Customer Number and has not yet been assigned a TCEQ Regulated Entity Number (RN). The TCEQ CN and RN for the facility will be issued with the submittal of the Core Data Form with this application.

With this letter, Pacifico is submitting this Standard Permit Application for Electric Generating Units to authorize natural gas-fired simple cycle turbines. This Standard Permit application contains TCEQ Form PI-1S and all required supporting documentation. Emission calculations are included in Appendix A. The \$900 standard permit registration fee and \$500 expedited fee were submitted to the TCEQ electronically via ePay.

Thank you for your assistance in this matter. Please feel free to call me at (504) 343-4593 (email: lkambham@trinityconsultants.com) or Mr. Constantyn Gieskes, Pacifico, at (713) 447-6669 (email: constantyn@pacificoenergy.com) should you have any questions or if you require additional information.

Sincerely,
Trinity Consultants

A handwritten signature in black ink, appearing to read "Latha Kambham", written in a cursive style.

Latha Kambham, Ph.D.
Principal Consultant

cc: Mr. Joseph Doby, Air Section Manager TCEQ Regional Office 12 (STEERS)
Mr. Constantyn Gieskes, VP of Origination & Project Development, Pacifico Spunky LLC

TCEQ STANDARD PERMIT APPLICATION FOR ELECTRIC GENERATING UNITS

**Pacifico Spunky LLC/ Cleburne,
TX**

Prepared By:

Latha Kambham, Ph.D. – Principal Consultant
Keely Grady – Associate Consultant

TRINITY CONSULTANTS

12700 Park Central Drive
Suite 600
Dallas, TX 75251
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June 2025

Project 254401.0115



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1. EXECUTIVE SUMMARY

Pacifico Spunky LLC (Pacifico) proposes to construct a natural gas-fired simple cycle electric generating facility at 5200 FM 2174, Cleburne, Texas 76033. Pacifico will be requesting a Texas Commission on Environmental Quality (TCEQ) Customer Number (CN) and a Regulated Entity Number (RN) for Pacifico Spunky LLC through this project.

Pacifico Spunky LLC is located in Johnson County, Texas, which is currently classified as an attainment or unclassified area for all criteria pollutants. Pacifico Spunky LLC is a minor source with respect to Prevention of Significant Deterioration (PSD) and New Source Review (NSR) programs and a major source with respect to the Federal Operating Permits Program (Title V).

Pacifico is constructing the power plant in a greenfield site and is submitting this Standard Permit for Electric Generating Units (SP EGU) registration application to authorize combustion turbines at Pacifico Spunky LLC. The project will consist of either of the following two (2) turbine Simple Cycle Natural gas-fired combustion turbine generators (CTG) models/scenarios:

- ▶ Option 1: 31 Solar T-130 turbines
- ▶ Option 2: 16 Solar T-350 turbines

In order to have the flexibility to choose either of these 2 turbine models, Pacifico is submitting emission calculations documentation for both scenarios. This Standard Permit application contains TCEQ Form PI-1S, TCEQ Core Data Form, and all required supporting documentation. Emission calculations are included in Appendix A. The \$900 standard permit registration fee and \$500 expedited fee were submitted to the TCEQ electronically via ePay.

2. TCEQ FORMS

Core Data Form

TCEQ Form PI-1S



TCEQ CORE DATA FORM

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

1.1 SECTION I: General Information

1. Reason for Submission (If other is checked please describe in space provided.)		
☒ New Permit, Registration or Authorization (Core Data Form should be submitted with the program application.)		
☐ Renewal (Core Data Form should be submitted with the renewal form)		☐ Other
2. Customer Reference Number (if issued)		3. Regulated Entity Reference Number (if issued)
CN		RN

1.2 SECTION II: Customer Information

4. General Customer Information		5. Effective Date for Customer Information Updates (mm/dd/yyyy)		5/10/2025	
☒ New Customer ☐ Update to Customer Information ☐ Change in Regulated Entity Ownership					
☐ Change in Legal Name (Verifiable with the Texas Secretary of State or Texas Comptroller of Public Accounts)					
<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>					
6. Customer Legal Name (If an individual, print last name first: eg: Doe, John) <i>If new Customer, enter previous Customer below:</i>					
Pacifico Spunky LLC					
7. TX SOS/CPA Filing Number		8. TX State Tax ID (11 digits)		9. Federal Tax ID (9 digits)	
0805996664		32099809496		33-3848230	
10. DUNS Number (if applicable)					
11. Type of Customer:		☒ Corporation		☐ Individual	
Government: ☐ City ☐ County ☐ Federal ☐ Local ☐ State ☐ Other		☐ Sole Proprietorship		Partnership: ☐ General ☐ Limited	
12. Number of Employees		☐ 0-20 ☒ 21-100 ☐ 101-250 ☐ 251-500 ☐ 501 and higher		13. Independently Owned and Operated?	
				☒ Yes ☐ No	
14. Customer Role (Proposed or Actual) – as it relates to the Regulated Entity listed on this form. Please check one of the following					
☐ Owner ☐ Operator ☒ Owner & Operator ☐ Other:					
☐ Occupational Licensee ☐ Responsible Party ☐ VCP/BSA Applicant					
15. Mailing Address:					
30900 Rancho Viejo Rd, #230					
City		State		ZIP	
San Juan Capistrano		CA		92675	
ZIP + 4					
16. Country Mailing Information (if outside USA)			17. E-Mail Address (if applicable)		
			Constantyn@PacificoEnergy.com		
18. Telephone Number		19. Extension or Code		20. Fax Number (if applicable)	
(925) 380-1589				() -	

1.3 SECTION III: Regulated Entity Information

21. General Regulated Entity Information (If 'New Regulated Entity' is selected, a new permit application is also required.)	
☒ New Regulated Entity ☐ Update to Regulated Entity Name ☐ 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>	

22. Regulated Entity Name <i>(Enter name of the site where the regulated action is taking place.)</i>							
Pacifico Spunky LLC							
23. Street Address of the Regulated Entity: <i>(No PO Boxes)</i>	5200 FM 2174						
	City	Cleburne	State	TX	ZIP	76033	ZIP + 4
24. County	Johnson						

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

25. Description to Physical Location:							
26. Nearest City					State	Nearest ZIP Code	
<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>							
27. Latitude (N) In Decimal:			28. Longitude (W) In Decimal:				
Degrees	Minutes	Seconds	Degrees	Minutes	Seconds		
32	21	2.37	97	39	29.72		
29. Primary SIC Code (4 digits)	30. Secondary SIC Code (4 digits)		31. Primary NAICS Code (5 or 6 digits)		32. Secondary NAICS Code (5 or 6 digits)		
4911			221112				
33. What is the Primary Business of this entity? <i>(Do not repeat the SIC or NAICS description.)</i>							
Electricity Generation							
34. Mailing Address:	30900 Rancho Viejo Rd, #230						
	City	San Juan Capistrano	State	CA	ZIP	92675	ZIP + 4
35. E-Mail Address:	Constantyn@PacificoEnergy.com						
36. Telephone Number	37. Extension or Code		38. Fax Number <i>(if applicable)</i>				
(713) 447-6669			() -				

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.

☐ Dam Safety	☐ Districts	☐ Edwards Aquifer	☐ Emissions Inventory Air	☐ Industrial Hazardous Waste
☐ Municipal Solid Waste	☒ New Source Review Air	☐ OSSF	☐ Petroleum Storage Tank	☐ PWS
☐ Sludge	☐ Storm Water	☐ Title V Air	☐ Tires	☐ Used Oil
☐ Voluntary Cleanup	☐ Wastewater	☐ Wastewater Agriculture	☐ Water Rights	☐ Other:

SECTION IV: Preparer Information

40. Name:	Latha Kambham	41. Title:	Prinicipal Consultant OM
42. Telephone Number	43. Ext./Code	44. Fax Number	45. E-Mail Address

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.

Company:	Pacifico Spunky LLC	Job Title:	VP of Origination & Project Development
Name <i>(In Print)</i>:	Constantyn Gieskes	Phone:	(713) 447- 6669
Signature:		Date:	

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

I. Registrant Information
A. Company or Other Legal Customer Name: Pacifico Spunky LLC
B. Company Official Contact Information: ☒ Mr. ☐ Mrs. ☐ Ms. ☐ Other: _____
Name: Constantyn Gieskes
Title: VP of Origination & Project Development
Mailing Address: 30900 Rancho Viejo Rd, #230
City: San Juan Capistrano
State: CA
ZIP Code: 92675
Telephone Number: (713) 447-6669
Fax Number:
Email Address: Constantyn@PacificoEnergy.com
<i>All permit correspondence will be sent via email.</i>
C. Technical Contact Information ☐ Mr. ☐ Mrs. ☒ Ms. ☐ Other: _____
Name: Latha Kambham
Title: Principal Consultant OM
Company Name: Trinity Consultants
Mailing Address: 12700 Park Central Dr, Suite 600
City: Dallas
State: TX
ZIP Code: 75251

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

I. Registrant Information (continued)
C. Technical Contact Information (continued)
Telephone Number: (972) 661-8100
Fax Number:
Email Address: LKambham@trinityconsultants.com
II. Facility and Site Information
A. Name and Type of Facility
Facility Name: Pacifico Spunky LLC
Type of Facility: ☒ Permanent ☐ Temporary
For portable units, please provide the serial number of the equipment being authorized below.
Serial No(s):
B. Facility Location Information
Street Address: 5200 FM 2174
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).
City: Cleburne
County: Johnson
ZIP Code: 76033
C. Core Data Form (required for Standard Permits 6006, 6007, and 6013).
Is the Core Data Form (TCEQ Form 10400) attached? ☒ Yes ☐ No
Customer Reference Number (CN): TBD
Regulated Entity Number (RN): TBD
D. TCEQ Account Identification Number (if known):

Form PI-1S
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(Page 3)
Texas Commission on Environmental Quality

II. Facility and Site Information (<i>continued</i>)
E. Type of Action ☒ Initial Application ☐ Change to Registration ☐ Renewal ☐ Renewal Certification
For Change to Registration, Renewal, or Renewal Certification actions provide the following:
Registration Number:
Expiration Date:
F. Standard Permit Claimed: Standard Permit for Electric Generating Units
G. Previous Standard Exemption or PBR Registration Number:
Is this authorization for a change to an existing facility previously authorized under a standard exemption or PBR? ☐ Yes ☒ No
If "Yes," enter previous standard exemption number(s) and PBR registration number(s) and associated effective date in the spaces provided below.
Standard Exemption Number(s):
PBR Registration Number(s):
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? ☐ Yes ☒ No
If "Yes," enter standard exemption number(s), PBR registration number(s), Standard Permit Registration Number(s), and associated effective date in the spaces provided below.
Standard Exemption Number(s):
PBR Registration Number(s):
Standard Permit Registration Number(s):

Form PI-1S
Registrations for Air Standard Permit
(Page 4)
Texas Commission on Environmental Quality

II. Facility and Site Information (<i>continued</i>)
I. Other Air Preconstruction Permits
Are there any other air preconstruction permits at this site? ☐ Yes☒ No
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? ☐ Yes☒ No
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? ☒ Yes☐ No☐ To Be Determined
Check the requirements of 30 TAC Chapter 122 that will be triggered if this standard permit is approved (<i>check all that apply</i>). ☒ Initial Application for a FOP ☐ Significant Revision for a SOP ☐ Minor Revision for a SOP ☐ Operational Flexibility/Off Permit Notification for a SOP ☐ Revision for a GOP ☐ To be Determined ☐ None
Identify the type(s) of FOP issued and/or FOP application(s) submitted/pending for the site. (<i>check all that apply</i>) ☐ SOP ☐ SOP application/revision (submitted or under APD review) ☐ GOP ☐ GOP application/revision (submitted or under APD review) ☒ N/A

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III. Fee Information (go to www.tceq.texas.gov/epay to pay online)
A. Fee Amount: \$1400
B. Voucher number from ePay:
IV. Public Notice (if applicable)
A. Responsible Person
☐ Mr.
☐ Mrs.
☐ Ms.
☐ Other: _____
Name:
Title:
Company:
Mailing Address:
City:
State:
ZIP Code:
Telephone No.:
Fax No.:
Email Address:
B. Technical Contact
☐ Mr.
☐ Mrs.
☐ Ms.
☐ Other: _____
Name:
Title:
Company:
Mailing Address:
City:
State:
ZIP Code:

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IV. Public Notice (if applicable)
B. Technical Contact
Telephone Number:
Fax Number:
Email Address:
C. Bilingual Notice
Is a bilingual program required by the Texas Education Code in the School District? ☐ Yes ☐ No
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? ☐ Yes ☐ No
If "Yes," list which language(s) are required by the bilingual program below? Language(s): _____ Language(s): _____
D. Small Business Classification and Alternate Public Notice
Does this company (including parent companies and subsidiary companies) have fewer than 100 employees or less than \$6 million in annual gross receipts? ☐ Yes ☐ No
Is the site a major source under 30 TAC Chapter 122, Federal Operating Permit Program? ☐ Yes ☐ No
Are the site emissions of any individual regulated air contaminant equal to or greater than 50 tpy? ☐ Yes ☐ No
Are the site emissions of all regulated air contaminant combined equal to or greater than 75 tpy? ☐ Yes ☐ No

Form PI-1S
Registrations for Air Standard Permit
(Page 7)
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V. Renewal Certification Option
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? ☐ Yes ☐ 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)? ☐ Yes ☐ No
C. Does the company and/or site have an unsatisfactory compliance history? ☐ Yes ☐ No
D. Are there any applications currently under review for this standard permit registration? ☐ Yes ☐ No
E. Are scheduled maintenance, startup, or shutdown emissions required to be included in the standard permit registration at this time? ☐ Yes ☐ No
F. Are any of the following actions being requested at the time of renewal: ☐ Yes ☐ No
1. Are there any facilities that have been permanently shut down that are proposed to be removed from the standard permit registration? ☐ Yes ☐ No
2. Do changes need to be made to the standard permit registration in order to remain in compliance? ☐ Yes ☐ 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? ☐ Yes ☐ No
4. Are there any changes to the current emission rates table being proposed? ☐ Yes ☐ 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 cannot 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
(Page8)
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VI. Technical Information Including State and Federal Regulatory Requirements
Place a check next to the appropriate box to indicate what you have included in your submittal. <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>
A. Standard Permit requirements (Checklists are optional; however, your review will go faster if you provide applicable checklists.)
Did you demonstrate that the general requirements in 30 TAC §§116.610 and 116.615 are met? ☒ Yes ☐ No
Did you demonstrate that the individual requirements of the specific standard permit are met? ☒ Yes ☐ No
B. Confidential Information (All pages properly marked "CONFIDENTIAL"). ☒ Yes ☐ No
C. Process Flow Diagram. ☒ Yes ☐ No
D. Process Description. ☒ Yes ☐ No
E. Maximum Emissions Data and Calculations. ☒ Yes ☐ No
F. Plot Plan. ☒ Yes ☐ No
G. Projected Start of Construction Date, Start of Operation Date, and Length of Time at Site: ☒ Yes ☐ No
Projected Start of Construction (provide date): 01/01/2027
Projected Start of Operation (provide date): 01/01/2028
Length of Time at the Site: Permanent

Form PI-1S
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VII. Delinquent Fees and Penalties

This form **will not be processed** until all delinquent fees and/or penalties owed to TCEQ or the Office of the Attorney General on behalf of 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:
www.tceq.texas.gov/agency/financial/fees/delin/index.html

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 (THSC), 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): Constantyn Gieskes

Signature (original signature required):

IX. Copies of the Registration

The Form 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/.

3. REGISTRATION FEE

In accordance with Title 30 of the Texas Administrative Code (30 TAC) Section (§) 116.614 and Air Quality Standard Permit for Electric Generating Units, a Standard Permit application fee of \$900 has been submitted to the TCEQ electronically via ePay. In addition, Pacifico is requesting this registration be expedited. Per the TCEQ's Expedited Permitting Guidance, a non-refundable surcharge of \$500 is required for a Standard Permit that does not require public notice. Pacifico submitted this expedited fee to the TCEQ electronically via ePay.

4. PLOT PLAN

A preliminary site map for the proposed project is provided at the end of this section.



A Salas O'Brien Company
2550 KRAFT DRIVE
NASHVILLE, TENNESSEE 37204
(615) 346-3400

DATA CENTER POWER
GENERATION

TEXAS



SEAL



NOTICE

THIS DRAWING IS PRELIMINARY AND NOT FOR CONSTRUCTION. IT IS THE RESPONSIBILITY OF THE USER TO OBTAIN ALL NECESSARY PERMITS AND APPROVALS FROM THE APPROPRIATE AGENCIES. THE USER SHALL BE RESPONSIBLE FOR ANY AND ALL CHANGES TO THIS DRAWING. THE USER SHALL BE RESPONSIBLE FOR ANY AND ALL CHANGES TO THIS DRAWING. THE USER SHALL BE RESPONSIBLE FOR ANY AND ALL CHANGES TO THIS DRAWING.

PROJECT NAME

PACIFICO POWER

JOB NO.

250078

NO.

A

DESCRIPTION

FEL-2 SUBMISSION

DATE

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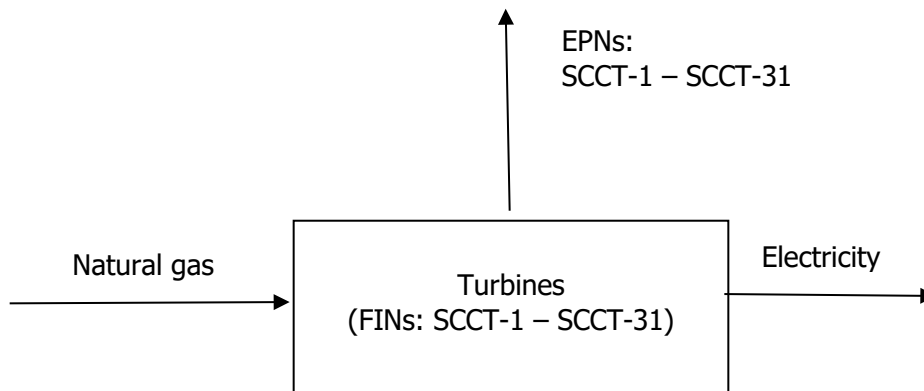
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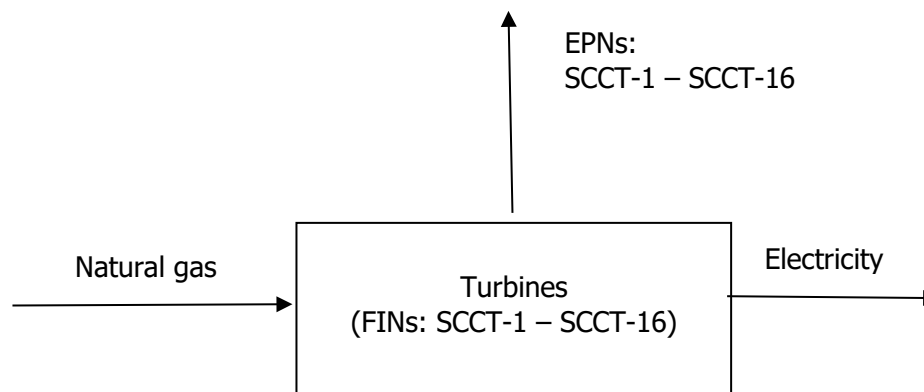
5. PROCESS DESCRIPTION AND PROCESS FLOW DIAGRAM

Pacifico will construct a natural gas-fired power plant that will produce its electricity via either 31 Solar Titan 130 (T-130) turbine models or 16 Solar Titan 350 (T-350) turbine models, with a combined nominal electrical output at 432 or 473 MW, for turbine models T-130 and T-350, respectively. Selective catalytic reduction (SCR) will be employed to control emissions of nitrogen oxides (NO_x) and oxidation catalyst will be employed to control emissions of carbon monoxide (CO) and volatile organic compounds (VOCs). These turbines will be operated continuously and expect minimum downtime. During the startup, the turbines will be ramped up in phases until the catalyst systems achieve the required temperature for emissions control. Similarly, during shutdown, turbines will be ramped down in phases. Each startup and shutdown event is expected to last 10 minutes per turbine.

A process flow diagram for the T-130 turbines is included below.



A process flow diagram for the T-350 turbines is included below.



6. EMISSIONS DATA

This section provides an overview of the air emissions associated with the gas-fired CTGs at Pacifico Spunky LLC. As noted in Section 1, Pacifico would like to have flexibility to choose either the T-130 or T-350 turbine models. Detailed calculations for emissions are provided in Appendix B.

6.1 Normal Operations

Emissions from the natural gas-fired CTGs are the result of the combustion of pipeline quality natural gas and ammonia slip (NH_3) from the SCR system. The turbines will utilize an SCR catalyst system to control emissions of NO_x oxidation catalyst to control CO and VOC emissions. Maximum hourly emissions are based on the emission guarantee statement for the CTGs included in Appendix B. Annual emissions are based total operating hours (i.e., including startup and shutdown hours).

6.2 Startup and Shutdown (SUSD) Emissions

SUSD emissions for the turbines include startup and shutdown events. The duration and number of SUSD events for each turbine model is provided below:

- ▶ Solar T-130 turbines
 - 10 minutes for each startup event and 5 minutes for each shutdown event
 - 10 SUSD events per year per turbine
- ▶ Solar T-350 turbines
 - 10 minutes for each startup event and 5 minutes for each shutdown event
 - 5 SUSD events per year per turbine

Since these turbines will serve as baseload units supplying power to the customers continuously, the SUSD events are expected to be minimal. Please note the number of startup events is for estimation purposes only and not intended to be an operational limit. Pacifico will demonstrate compliance with the hourly and annual emission limits in the Standard Permit by tracking actual operating data. During the startup event, the control devices do not operate at their maximum control efficiency resulting in increased emissions of CO, VOC, and NO_x . Emissions of CO, VOC, and NO_x during startup and shutdown operations were provided by the vendor. Emissions of particulate matter (PM), PM less than 10 microns in diameter (PM_{10}), PM less than 2.5 microns in diameter ($\text{PM}_{2.5}$), sulfur dioxide (SO_2), and ammonia (NH_3) during startup and shutdown are assumed to be no more than the emissions from normal operations. Maximum hourly and annual emissions for startup are based on the maximum startup event duration and events per year totaling 5 hours/year per unit.

7. GENERAL STANDARD PERMIT REQUIREMENTS

This section provides a summary demonstration that the electric generating project at Pacifico Spunky LLC will meet all applicable requirements of 30 TAC §116.610 and §116.615.

7.1. 30 TAC §116.610. Applicability Effective April 17, 2014

- (a) *Under the Texas Clean Air Act, §382.051, a project that meets the requirements for a Standard Permit listed in this subchapter or issued by the commission is hereby entitled to the Standard Permit, provided the following conditions listed in this section are met. For the purposes of this subchapter, project means the construction or modification of a facility or a group of facilities submitted under the same registration.*
- (1) *Any project which results in a net increase in emissions of air contaminants from the project other than carbon dioxide, water, nitrogen, ethane, hydrogen, oxygen, or greenhouse gases (GHGs) as defined in §101.1 of this title (relating to Definitions), or those for which a national ambient air quality standard has been established must meet the emission limitations of §106.261 of this title (relating to Facilities (Emission Limitations)), unless otherwise specified by a particular Standard Permit.*

Per Air Quality Standard Permit for Electric Generating Units (Effective Date May 16, 2007) (3)(A), units that meet the conditions of the EGU Standard Permit do not have to meet 30 TAC § 116.610(a)(1), Applicability. Therefore, this requirement does not apply to the proposed project.

- (2) *Construction or operation of the project must be commenced prior to the effective date of a revision to this subchapter under which the project would no longer meet the requirements for a Standard Permit.*

Construction and operation of the proposed turbines will commence prior to the effective date of a revision to this subchapter so that the requirements for the Standard Permit are met.

- (3) *The proposed project must comply with the applicable provisions of the Federal Clean Air Act (FCAA), §111 (concerning New Source Performance Standards) as listed under Title 40 of the Code of Federal Regulations (40 CFR) Part 60, promulgated by the United States Environmental Protection Agency (U.S. EPA).*

Pacifico Spunky LLC CTG Units are subject to NSPS Subpart KKKK. Pacifico will comply with applicable requirements under New Source Performance Standard (NSPS) as promulgated under Title 40 of the Code of Federal Regulations (40 CFR) Part 60.

- (4) *The proposed project must comply with the applicable provisions of FCAA, §112 (concerning Hazardous Air Pollutants) as listed under 40 CFR Part 61, promulgated by the U.S. EPA.*

The turbines are not subject to any National Emission Standards for Hazardous Air Pollutants (NESHAP) codified in 40 CFR Part 61.

- (5) *The proposed project must comply with the applicable maximum achievable control technology standards as listed under 40 CFR Part 63, promulgated by the U.S. EPA under FCAA, §112 or as listed under Chapter 113, Subchapter C of this title (relating to National Emissions Standards for Hazardous Air Pollutants for Source Categories (FCAA §112, 40 CFR 63)).*

The Pacifico Spunky LLC CTGs are not subject to any requirements under Maximum Achievable Control Technology (MACT) Standards under 40 CFR Part 63. The site is an area source for hazardous air pollutants (HAPs).

- (6) *If subject to Chapter 101, Subchapter H, Division 3 of this title (relating to Mass Emissions Cap and Trade Program) the proposed facility, group of facilities, or account must obtain allocations to operate.*

Pacifico Spunky LLC is in Johnson County, which is not subject to 30 TAC Chapter 101, Subchapter H, Division 3. Therefore, this requirement does not apply.

- (b) *Any project that constitutes a new major stationary source or major modification as defined in §116.12 of this title (relating to Nonattainment and Prevention of Significant Deterioration Review Definitions) because of emissions of air contaminants other than greenhouse gases is subject to the requirements of §116.110 of this title (relating to Applicability) rather than this subchapter. Notwithstanding any provision in any specific Standard Permit to the contrary, any project that constitutes a new major stationary source or major modification which is subject to Subchapter B, Division 6 of this chapter (relating to Prevention of Significant Deterioration Review) due solely to emissions of greenhouse gases may use a Standard Permit under this chapter for air contaminants that are not greenhouse gases.*

The turbines do not constitute new major stationary sources or major modifications as defined in §116.12. Therefore, this project is not subject to the requirements of 30 TAC §116.110.

- (c) *Persons may not circumvent by artificial limitations the requirements of §116.110 of this title.*

Artificial limitations have not been used to circumvent the requirements of §116.110.

- (d) *Any project involving a proposed affected source (as defined in §116.15(1) of this title (relating to Section 112(g) Definitions)) shall comply with all applicable requirements under Subchapter E of this chapter (relating to Hazardous Air Pollutants: Regulations Governing Constructed or Reconstructed Major Sources (FCAA, §112(g), 40 CFR Part 63)). Affected sources subject to Subchapter E of this chapter may use a Standard Permit under this subchapter only if the terms and conditions of the specific Standard Permit meet the requirements of Subchapter E of this chapter.*

Pacifico Spunky LLC is not considered an affected source per Section 112(g). Therefore, the requirements of Subchapter E of 30 TAC 116 are not applicable to this project.

7.2. 30 TAC §116.615. General Conditions

Effective November 22, 2018

The following general conditions are applicable to holders of Standard Permits, but will not necessarily be specifically stated within the Standard Permit document.

- (1) *Protection of public health and welfare. The emissions from the facility, including dockside vessel emissions, must 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 (TCAA), including protection of health and property of the public.*

This Standard Permit application documents that the proposed project will comply with the rules and regulations of the TCEQ and the intent of the TCAA, including protection of health and property of the public.

- (2) *Standard permit representations. All representations with regard to construction plans, operating procedures, pollution control methods, and maximum emission rates in any registration for a standard permit become conditions upon which the facility or changes thereto, must be constructed and operated. It is unlawful for any person to vary from such representations if the change will affect that person's right to claim a standard permit under this section. Any change in condition such that a person is no longer eligible to claim a standard permit under this section requires proper authorization under §116.110 of this title (relating to Applicability). Any changes in representations are subject to the following requirements:*
 - (A) *For the addition of a new facility, the owner or operator shall submit a new registration incorporating existing facilities with a fee, in accordance with §116.611 and §116.614 of this title, (relating to Registration to use a Standard Permit and Standard Permit Fees) prior to commencing construction. If the applicable standard permit requires public notice, construction of the new facility or facilities may not commence until the new registration has been issued by the executive director.*
 - (B) *For any change in the method of control of emissions, a change in the character of the emissions, or an increase in the discharge of the various emissions, the owner or operator shall submit written notification to the executive director describing the change(s), along with the designated fee, no later than 30 days after the change.*
 - (C) *For any other change to the representations, the owner or operator shall submit written notification to the executive director describing the change(s) no later than 30 days after the change.*
 - (D) *Any facility registered under a standard permit which contains conditions or procedures for addressing changes to the registered facility which differ from subparagraphs (A) - (C) of this paragraph shall comply with the applicable requirements of the standard permit in place of subparagraphs (A) - (C) of this paragraph.*

Pacifico understands that Standard Permit representations become conditions upon which the facility must be operated. Any changes to the representations in this application will be communicated to the TCEQ.

- (3) *Standard permit in lieu of permit amendment. All changes authorized by standard permit to a facility previously permitted under §116.110 of this title shall be administratively incorporated into that facility's permit at such time as the permit is amended or renewed.*

There is no previous permit under §116.110 with Pacifico Spunky LLC at the time of the application; therefore, this requirement does not apply.

- (4) *Construction progress. Start of construction, construction interruptions exceeding 45 days, and completion of construction shall be reported to the appropriate regional office not later than 15 working days after occurrence of the event, except where a different time period is specified for a particular standard permit.*

Pacifico will notify TCEQ Region 4 of construction progress as required.

- (5) *Start-up notification.*
- (A) *The appropriate air program regional office of the commission and any other air pollution control agency having jurisdiction shall be notified prior to the commencement of operations of the facilities authorized by a standard permit in such a manner that a representative of the executive director may be present.*
- (B) *For phased construction, which may involve a series of units commencing operations at different times, the owner or operator of the facility shall provide separate notification for the commencement of operations for each unit.*
- (C) *Prior to beginning operations of the facilities authorized by the permit, the permit holder shall identify to the Office of Permitting, Remediation, and Registration, the source or sources of allowances to be utilized for compliance with Chapter 101, Subchapter H, Division 3 of this title (relating to Mass Emissions Cap and Trade Program).*
- (D) *A particular standard permit may modify start-up notification requirements.*

Pacifico will provide start-up notification as required.

- (6) *Sampling requirements. If sampling of stacks or process vents is required, the standard permit holder shall contact the commission's appropriate regional office and any other air pollution control agency having jurisdiction prior to sampling to obtain the proper data forms and procedures. All sampling and testing procedures must be approved by the executive director and coordinated with the regional representatives of the commission. The standard permit holder is also responsible for providing sampling facilities and conducting the sampling operations or contracting with an independent sampling consultant.*

If stack sampling is required by the Executive Director, Pacifico will comply with these stack sampling requirements.

- (7) *Equivalency of methods. The standard permit holder shall demonstrate or otherwise justify the equivalency of emission control methods, sampling or other emission testing methods, and monitoring methods proposed as alternatives to methods indicated in the conditions of the standard*

permit. Alternative methods must be applied for in writing and must be reviewed and approved by the executive director prior to their use in fulfilling any requirements of the standard permit.

Pacifico is not requesting any alternatives to emissions control methods, sampling or other emission testing methods, and monitoring methods indicated in the conditions of the Standard Permit. Pacifico understands that if changes are proposed, equivalency of methods will be required.

- (8) *Recordkeeping. A copy of the standard permit along with information and data sufficient to demonstrate applicability of and compliance with the standard permit shall be maintained in a file at the plant site and made available at the request of representatives of the executive director, the United States Environmental Protection Agency, or any air pollution control agency having jurisdiction. For facilities that normally operate unattended, this information shall be maintained at the nearest staffed location within Texas specified by the standard permit holder in the standard permit registration. This information must include, but is not limited to, production records and operating hours. Additional recordkeeping requirements may be specified in the conditions of the standard permit. Information and data sufficient to demonstrate applicability of and compliance with the standard permit must be retained for at least two years following the date that the information or data is obtained. The copy of the standard permit must be maintained as a permanent record.*

Pacifico will maintain records as required by the Standard Permit and make them available to representatives of the executive director, the U.S. EPA, or any local pollution control program with jurisdiction.

- (9) *Maintenance of emission control. The facilities covered by the standard permit may not be operated unless all air pollution emission capture and abatement equipment is maintained in good working order and operating properly during normal facility operations. Notification for emissions events and scheduled maintenance shall be made in accordance with §101.201 and §101.211 of this title (relating to Emissions Event Reporting and Recordkeeping Requirements; and Scheduled Maintenance, Startup, and Shutdown Reporting and Recordkeeping Requirements).*

Pacifico will maintain the air pollution capture and abatement equipment covered by this Standard Permit in good working order and will operate the air pollution capture and abatement equipment properly during normal facility operations. Notifications under 30 TAC §101.201 and §101.211 will be made, as appropriate.

- (10) *Compliance with rules. Registration of a standard permit by a standard permit applicant constitutes an acknowledgment and agreement that the holder will comply with all rules, regulations, and orders of the commission issued in conformity with the TCAA and the conditions precedent to the claiming of the standard permit. If more than one state or federal rule or regulation or permit condition are applicable, the most stringent limit or condition shall govern. Acceptance includes consent to the entrance of commission employees and designated representatives of any air pollution control agency having jurisdiction into the permitted premises at reasonable times to investigate conditions relating to the emission or concentration of air contaminants, including compliance with the standard permit.*

Pacifico will comply will all rules, regulations, and orders of the commission.

- (11) *Distance limitations, setbacks, and buffer zones. Notwithstanding any requirement in any standard permit, if a standard permit for a facility requires a distance, setback, or buffer from other property or structures as a condition of the permit, the determination of whether the distance, setback, or buffer is satisfied shall be made on the basis of conditions existing at the earlier of:*

(A) the date new construction, expansion, or modification of a facility begins; or

(B) the date any application or notice of intent is first filed with the commission to obtain approval for the construction or operation of the facility.

The Air Quality Standard Permit for Electric Generating Units does not require distance limits, setbacks, or buffer zones. Therefore, this condition does not apply.

8. SPECIFIC STANDARD PERMIT REQUIREMENTS

This section demonstrates that the turbine units at Pacifico Spunky LLC meet all requirements of the Air Quality Standard Permit for Electric Generating Units, effective May 16, 2007.

8.1 Air Quality Standard Permit for Electric Generating Units, Effective 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.*
- (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.*

Pacifico proposes to install electric generating units at Pacifico Spunky LLC, and the units meet the requirements of this standard permit.

(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.*
- (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.*
- (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.*

Pacifico Spunky LLC is in Johnson County, which belongs to the West Texas Region.

(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.*

Pacifico is submitting a current Form PI-1S with this standard permit 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_x) emissions that are less than 10 percent of the standards required by this standard permit.*

The \$900 standard permit registration fee was submitted to the TCEQ electronically via ePay.

- (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.*

Pacifico will not begin construction and/or operation without first obtaining written approval from the executive director.

- (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).*

Pacifico will maintain records to demonstrate compliance with representations associated with this Standard Permit registration. This includes keeping records of hours of operation of each unit, maintenance activities, and fuel sulfur limits.

- (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.*

Pacifico will comply with the applicable requirements of 40 CFR Part 60 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.*

Pacifico will comply with all applicable conditions of 30 TAC Chapter 117. 30 TAC Chapter 114 does not apply to the proposed project.

(4) *Administrative Requirements.*

- (A) *Emissions of NO_x 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.*

Emissions of NO_x will be certified by the manufacturer, owner, or operator as stated in this provision. The certification will be displayed as instructed in this provision.

- (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 proposed project will not authorize CHP units; thus, this citation does not apply.

- (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.*

The CTGs are fueled by pipeline quality natural gas. Pacifco will comply with fuel requirements of the Standard Permit.

- (D) *Except as provided in subsections (4)(F) and (4)(H), NO_x 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.*

Each CTGs has a capacity of greater 10 MW and thus not subject to the provisions of this subsection.

- (E) Except as provided in subsections (4)(F) and (4)(H), NO_x 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 proposed CTGs have capacity greater than 10 MW and will be operated more than 300 hours per year. The CTGs will comply with the NO_x limitation of 0.14 lb/MWh as per Subsection 4 (E) (i).

- (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_x 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_x limit in subsection (4)(D).*

The proposed CTGs do not fire 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; therefore, this requirement does not apply.

- (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_x 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.*

Pacifico will comply with continuing compliance requirements.

- (H) *The NO_x emission limits in subsections (4)(D)-(4)(F) are subject to the following exceptions:*
- (i) *The hourly NO_x 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_x 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_x 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.*

Pacifico understands the NO_x emission limits (4)(D)-(4)(F) are subject to the above exceptions.

9. NSR AND TITLE V APPLICABILITY DOCUMENTATION

Pacifico Spunky LLC as proposed will be a minor source with respect to NSR and the Prevention of Significant Deterioration (PSD) program. The facility will be major to the federal operating permits program (Title V) and will submit a Title V permit application as required.

APPENDIX A. EMISSION CALCULATIONS

SITE-WIDE EMISSIONS SUMMARY: CRITERIA POLLUTANTS, SULFURIC ACID MIST, and FORMALDEHYDE

Pacifico Spunky LLC

Turbine Model	Solar T-130	Solar T-350	Notes
Number of Units	31	16	
Nominal Power Output	13.93	29.58	per turbine (@ 95 °F ambient temperature)
Total Annual Hours of Operation	8760	8760	per turbine
SUSD Events/Year	10	5	per turbine
TOTAL MW	432	473	

Site-Wide Emission Summary Table for Criteria Pollutants

		Maximum Hourly Emissions (lb/hr) - <u>per</u> Turbine									Annual Emissions (tpy) - <u>per</u> Turbine								
Turbine Model	Description	CO	NO _x	PM	PM ₁₀	PM _{2.5}	SO ₂	VOC	H ₂ SO ₄	HCHO	CO	NO _x	PM	PM ₁₀	PM _{2.5}	SO ₂	VOC	H ₂ SO ₄	HCHO
Solar T-130	Simple Cycle Combustion Turbine - Natural Gas (Normal)	1.05	1.15	1.58	1.58	1.58	0.26	0.60	0.060	0.04	4.74	5.04	6.92	6.92	6.92	1.12	2.66	0.26	0.17
	Simple Cycle Combustion Turbine - Natural Gas (MSS)	30.79	2.86	1.58	1.58	1.58	0.26	0.60	0.060	0.04									
Solar T-350	Simple Cycle Combustion Turbine - Natural Gas (Normal)	3.41	2.24	3.08	3.08	3.08	0.55	1.95	0.130	0.08	15.38	9.86	13.49	13.49	13.49	2.43	8.57	0.57	0.36
	Simple Cycle Combustion Turbine - Natural Gas (MSS)	179.56	19.68	3.08	3.08	3.08	0.55	12.46	0.130	0.08									

Turbine Model: Solar T-130										31 units
	Annual Emissions (tpy) - <u>All</u> Turbines									
	CO	NO _x	PM	PM ₁₀	PM _{2.5}	SO ₂	VOC	H ₂ SO ₄	HCHO	
Emissions from Combustion Turbines	146.94	156.24	214.52	214.52	214.52	34.72	82.46	8.06	5.27	
Total Site-wide Emissions	146.94	156.24	214.52	214.52	214.52	34.72	82.46	8.06	5.27	
EGU Standard Permit Sitewide Thresholds	250	250	250	250	250	250	250	250	250	
Exceeding Standard Permit Thresholds? (Y/N)	N	N	N	N	N	N	N	N	N	--
PSD Sitewide Thresholds	250	250	250	250	250	250	250	250	250	
Exceeding Major Source Thresholds? (Y/N)	N	N	N	N	N	N	N	N	N	--
Title V Sitewide Thresholds	100	100	100	100	100	100	100	100	100	10
Exceeding Major Source Thresholds? (Y/N)	Y	Y	Y	Y	Y	N	N	N	N	

Turbine Model: Solar T-350										16 units
	Annual Emissions (tpy) - <u>All</u> Turbines									
	CO	NO _x	PM	PM ₁₀	PM _{2.5}	SO ₂	VOC	H ₂ SO ₄	HCHO	
Emissions from Combustion Turbines	246.08	157.76	215.84	215.84	215.84	38.88	137.12	9.12	5.76	
Total Site-wide Emissions	246.08	157.76	215.84	215.84	215.84	38.88	137.12	9.12	5.76	
EGU Standard Permit Sitewide Thresholds	250	250	250	250	250	250	250	250	250	
Exceeding Standard Permit Thresholds? (Y/N)	N	N	N	N	N	N	N	N	N	--
PSD Sitewide Thresholds	250	250	250	250	250	250	250	250	250	
Exceeding Major Source Thresholds? (Y/N)	N	N	N	N	N	N	N	N	N	--
Title V Sitewide Thresholds	100	100	100	100	100	100	100	100	100	10
Exceeding Major Source Thresholds? (Y/N)	Y	Y	Y	Y	Y	N	Y	N	N	

EMISSION CALCULATIONS FOR COMBUSTION TURBINE

Pacifico Spunky LLC - Solar T-130

Table 1: Simple Cycle Combustion Turbine Input Data

Parameters	Units	Value
Natural Gas Flow Rate (LHV) ¹	MMBtu/hr	166
Fuel Heat Input (HHV) ¹	MMBtu/hr	182.82
Natural Gas HHV ²	btu/scf	1,020
Natural Gas Sulfur Content - annual ²	gr/100 scf	0.50
Natural Gas Sulfur Content - hourly ²	gr/100 scf	0.50

Table 2: Operating Scenarios for Maximum Potential Emission Calculations

	Units	Value
Annual Hours of Operation (Total)	hrs/yr/CT	8,760
No. of Startups & Shutdowns (SUSD) per hour per CT	events/hr/CT	1
No. of SUSDs per day per CT	events/day/CT	1
No. of SUSDs per year per CT ³	events/yr/CT	10

¹ Fuel Heat Input from the turbine performance data provided by Pacifico Power to Trinity Consultants via email on January 16, 2025. Data represents the maximum value from all operating scenarios.

² Defined by EPA as pipeline quality sweet natural gas, maximum sulfur content, AP-42 Section 5.3, *Natural Gas Processing*.

³ Number of SUSD events per year provided by Pacifico Power to Trinity Consultants via email on June 10, 2025.

Table 3: Turbine Emission Rates (lb/hr) - Controlled per Combustion Turbine

Fuel	Units	CO ²	NO _x ^{2,3}	VOC	PM	PM ₁₀ /PM _{2.5} ⁴	SO ₂ ⁵	H ₂ SO ₄ ⁶	HCHO
Natural Gas ¹	lb/hr	1.05	1.15	0.60	1.58	1.58	0.26	0.06	0.04
	lb/MWh	--	0.082	--	--	--	--	--	--

¹ Natural gas combustion emissions per the manufacturer guarantee information provided by Pacifico Power to Trinity Consultants via email on January 16, 2025. Emissions represent the maximum value across all operating scenarios (various loads and ambient temperatures).

² CO and NO_x turbine emission rates are with controls

³ NO_x lb/MWh is a Standard Permit for EGU limit.

NO_x lb/MWh =

156.86 MMBtu	0.0073 lb	13934 kW	MW	=	0.082 lb/MWh
hr	MMBtu		1000 kW		

⁴ All particulate matter is assumed to be less than 1 μm, therefore the emission factor and the calculated emissions are the same for PM, PM₁₀, and PM_{2.5}.

⁵ SO₂ emissions for natural gas combustion are calculated based on the maximum hourly sulfur content of natural gas as follows:

SO₂ Hourly Emissions (lb/hr) =

0.5 gr S	lb	182.82 MMBtu	10 ⁶ Btu	1 scf	64.06 lb SO ₂	1 lb-mole S	=	0.26 lb/hr
100 scf	7,000 gr	1 hr	1 MMBtu	1,020 btu	1 lb-mole SO ₂	32.06 lb S		

⁶ The sulfuric acid mist emissions are estimated based on the assumption that 15% of total sulfur will be converted to SO₃ and that all of the SO₃ will react with water vapor to form a sulfuric acid mist.

H₂SO₄ Hourly Emissions (lb/hr) =

0.26 lb SO ₂	0.15	98.08 lb H ₂ SO ₄	1 lb-mol SO ₂	=	0.06 lb/hr
(Natural Gas Combustion)	hr	1 lb-mol H ₂ SO ₄	64.06 lb SO ₂		

Table 4: Turbine Emission Factors - Startup Shutdown (SUSD) Events per Combustion Turbine - Natural Gas

Parameter	Event		Emissions per Event (lb/event) ²		
	Interval	Duration (mins) ¹	CO	NO _x	VOC
Startup Event, T-5 (from first fire to stable CT emissions) ¹	T0 - T10	10	15	1	3
Normal Operation (Stable to Shutdown)	T10 - T55	45	0.79	0.86	0.45
Shutdown Duration (initiation to idle) ¹	T55 - T60	5	15	1	3
Maximum Hourly MSS Emissions	T0 - T60	60	30.79	2.86	6.45

¹ The duration of startup and shutdown events were provided by Pacifico Power to Trinity Consultants via email on June 3, 2025.

² SUSD emissions information provided by Pacifico Power to Trinity Consultants via email on January 16, 2025. Sample calculation for the CO emissions during normal operations is provided below:

Maximum CO Emissions during normal operations = 0.79 lb/hr

Duration from T5 - T55 = 45 mins

CO Emissions during T5 - T55 =

1.05 lb	45 min	1 hr	= 0.79 lb/event
	1 hr	event	60 mins

EMISSION CALCULATIONS FOR COMBUSTION TURBINE

Pacifico Spunky LLC - Solar T-130

Table 5: Proposed Emissions for Each Combustion Turbine

Fuel	Hours of Operation ¹		CO ²		NO _x ²		VOC ²		PM ³		PM ₁₀ /PM _{2.5} ³		SO ₂ ^{3,4}		H ₂ SO ₄ ³		HCHO ³	
	(hrs/yr)		(lb/hr)	(tpy)	(lb/hr)	(tpy)	(lb/hr)	(tpy)	(lb/hr)	(tpy)	(lb/hr)	(tpy)	(lb/hr)	(tpy)	(lb/hr)	(tpy)	(lb/hr)	(tpy)
Natural Gas	Normal	8,750	1.05	4.59	1.15	5.03	0.60	2.63	1.58	6.92	1.58	6.92	0.26	1.12	0.06	0.26	0.04	0.17
	SUSD	10	30.79	0.15	2.86	0.01	6.45	0.03										
Total Calculated		8,760		4.74		5.04		2.66		6.92		6.92		1.12		0.26		0.17

¹ The operating scenarios represented in the table are for maximum potential emissions estimation purposes only. These operating scenarios shall not be used to limit the maximum hours of operation, number of SUSD events or amount of natural gas firing. Pacifico Power will track actual operations to demonstrate compliance with the emission limits in the permit.

² Emissions of NO_x, CO and VOC are calculated based on estimated hours of operation in each mode (normal vs. SUSD).

³ Emissions of PM, PM₁₀, PM_{2.5}, SO₂, H₂SO₄, HCHO and CO₂ during SUSD events are assumed to be no more than the emissions from normal operations.

⁴ SO₂ emissions for natural gas combustion are calculated based on the maximum annual sulfur content of natural gas as follows:

$$\text{SO}_2 \text{ Annual Emissions (tpy)} = \frac{0.5 \text{ gr S}}{100 \text{ scf}} \times \frac{\text{lb}}{7,000 \text{ gr}} \times \frac{182.82 \text{ MMBtu}}{1 \text{ hr}} \times \frac{10^6 \text{ Btu}}{1 \text{ MMBtu}} \times \frac{1 \text{ scf}}{1,020 \text{ btu}} \times \frac{64.06 \text{ lb SO}_2}{1 \text{ lb-mole SO}_2} \times \frac{8760 \text{ hrs}}{\text{yr}} \times \frac{\text{ton}}{2,000 \text{ lb}} = 1.12 \text{ tpy}$$

Table 6: Proposed HAP Emissions per Combustion Turbine

Pollutant	Emission Factors ^{1, 2}	Hourly Emissions per Turbine ²	Annual Emissions per Turbine ³
	Natural Gas		
	(lb/MMBtu)	(lb/hr)	(tpy)
1,3-Butadiene	4.30E-07	7.86E-05	3.44E-04
Acetaldehyde	4.00E-05	7.31E-03	0.03
Acrolein	6.40E-06	1.17E-03	5.12E-03
Benzene	1.20E-05	2.19E-03	9.61E-03
Ethylbenzene	3.20E-05	5.85E-03	0.03
Formaldehyde ⁴	2.10E-04	0.04	0.17
Naphthalene	1.30E-06	2.38E-04	1.04E-03
PAH	2.20E-06	4.02E-04	1.76E-03
Propylene Oxide	2.90E-05	5.30E-03	0.02
Toluene	1.30E-04	0.02	0.10
Xylene	6.40E-05	0.01	0.05
Total HAPs (tpy)			0.42
Maximum Single HAP (tpy)			0.17

¹ Emission factors for natural gas combustion obtained from U.S. EPA, AP-42, Section 3.1 *Stationary Gas Turbines*, Table 3.1-3 *Emission Factors for Hazardous Air Pollutants from Natural Gas-Fired Stationary Gas Turbines*.

² Hourly Emissions per Unit (lb/hr) = Emission Factor (lb/MMBtu) * Maximum Fuel Input Rate (MMBtu/hr)

$$\text{Hourly Emission Rate for Formaldehyde per Turbine (lb/hr)} = \frac{2.1\text{E-}04 \text{ lb}}{\text{MMBtu}} \times \frac{182.8 \text{ MMBtu}}{\text{hr}} = 0.04 \text{ lb/hr}$$

(Natural Gas Combustion)

³ Annual Emissions per Turbine for Natural Gas (tpy) = Maximum Hourly Emission Rate for Natural Gas (lb/hr) * Total Annual Operating Hours for Natural Gas (hrs/yr) / 2,000 (lb/ton)

$$\text{Annual HAP Emission Rate for Formaldehyde per Turbine (tpy)} = \frac{0.04 \text{ lb}}{\text{hr}} \times \frac{8,760 \text{ hrs}}{\text{yr}} \times \frac{1 \text{ ton}}{2,000 \text{ lbs}} = 0.17 \text{ tpy}$$

(Natural Gas Combustion)

⁴ Emission factor for formaldehyde from the turbine emission estimates provided by Pacifico Power-to Trinity Consultants via email on May 5, 2025.

EMISSION CALCULATIONS FOR COMBUSTION TURBINE

Pacifico Spunky LLC - Solar T-350

Table 1: Simple Cycle Combustion Turbine Input Data

Parameters	Units	Value
Natural Gas Flow Rate (LHV) ¹	MMBtu/hr	360
Fuel Heat Input (HHV) ¹	MMBtu/hr	396.44
Natural Gas HHV ²	btu/scf	1,020
Natural Gas Sulfur Content - annual ²	gr/100 scf	0.50
Natural Gas Sulfur Content - hourly ²	gr/100 scf	0.50

Table 2: Operating Scenarios for Maximum Potential Emission Calculations

	Units	Value
Annual Hours of Operation (Total)	hrs/yr/CT	8,760
No. of Startups & Shutdowns (SUSD) per hour per CT	events/hr/CT	1
No. of SUSDs per day per CT	events/day/CT	1
No. of SUSDs per year per CT	events/yr/CT	5

¹ Fuel Heat Input from the turbine performance data provided by Pacifico Power to Trinity Consultants via email on May 21, 2025. Data represents the maximum value from all operating scenarios.

² Defined by EPA as pipeline quality sweet natural gas, maximum sulfur content, AP-42 Section 5.3, *Natural Gas Processing*.

Table 3: Turbine Emission Rates (lb/hr) - Controlled per Combustion Turbine

Fuel	Units	CO ²	NO _x ^{2,3}	VOC	PM	PM ₁₀ /PM _{2.5} ⁴	SO ₂ ⁵	H ₂ SO ₄ ⁶	HCHO
Natural Gas ¹	lb/hr	3.41	2.24	1.95	3.08	3.08	0.55	0.13	0.08
	lb/MWh	--	0.070	--	--	--	--	--	--

¹ Natural gas combustion emissions per the manufacturer guarantee information provided by Pacifico Power to Trinity Consultants via email on May 21, 2025. Emissions represent the maximum value across all operating scenarios (various loads and ambient temperatures).

² CO and NOx turbine emission rates are with controls

³ NOx lb/MWh is a Standard Permit for EGU limit.

$$\text{NOx lb/MWh} = \frac{156.86 \text{ MMBtu}}{\text{hr}} \times \frac{0.0073 \text{ lb}}{\text{MMBtu}} \times \frac{29575 \text{ kW}}{1000 \text{ kW}} = 0.070 \text{ lb/MWh}$$

⁴ All particulate matter is assumed to be less than 1 µm, therefore the emission factor and the calculated emissions are the same for PM, PM₁₀, and PM_{2.5}.

⁵ SO₂ emissions for natural gas combustion are calculated based on the maximum hourly sulfur content of natural gas as follows:

$$\text{SO}_2 \text{ Hourly Emissions (lb/hr)} = \frac{0.5 \text{ gr S}}{100 \text{ scf}} \times \frac{\text{lb}}{7,000 \text{ gr}} \times \frac{396.44 \text{ MMBtu}}{1 \text{ hr}} \times \frac{10^6 \text{ Btu}}{1 \text{ MMBtu}} \times \frac{1 \text{ scf}}{1,020 \text{ btu}} \times \frac{64.06 \text{ lb SO}_2}{1 \text{ lb-mole SO}_2} \times \frac{1 \text{ lb-mole S}}{32.06 \text{ lb S}} = 0.55 \text{ lb/hr}$$

⁶ The sulfuric acid mist emissions are estimated based on the assumption that 15% of total sulfur will be converted to SO₃ and that all of the SO₃ will react with water vapor to form a sulfuric acid mist.

$$\text{H}_2\text{SO}_4 \text{ Hourly Emissions (lb/hr)} = \frac{0.55 \text{ lb SO}_2}{\text{hr}} \times \frac{0.15}{1 \text{ lb-mol H}_2\text{SO}_4} \times \frac{98.08 \text{ lb H}_2\text{SO}_4}{64.06 \text{ lb SO}_2} = 0.13 \text{ lb/hr}$$

Table 4: Turbine Emission Factors - Startup Shutdown (SUSD) Events per Combustion Turbine - Natural Gas

Parameter	Event				
	Interval	Duration (mins) ¹	CO	NO _x	VOC
Startup Event, T-5 (from first fire to stable CT emissions) ¹	T0 - T10	10	97	10	6
Normal Operation (Stable to Shutdown)	T10 - T55	45	2.56	1.68	1.46
Shutdown Duration (initiation to idle) ¹	T55 - T60	5	80	8	5
Maximum Hourly MSS Emissions	T0 - T60	60	179.56	19.68	12.46

¹ The duration of startup and shutdown events were provided by Pacifico Power to Trinity Consultants via email on June 3, 2025.

² SUSD emissions information provided by Pacifico Power to Trinity Consultants via email on May 26, 2025. Sample calculation for the CO emissions during normal operations is provided below:

$$\begin{aligned} \text{Maximum CO Emissions during normal operations} &= 2.56 \text{ lb/hr} \\ \text{Duration from T5 - T55} &= 45 \text{ mins} \\ \text{CO Emissions during T5 - T55} &= \frac{3.41 \text{ lb}}{1 \text{ hr}} \times \frac{45 \text{ min}}{\text{event}} \times \frac{1 \text{ hr}}{60 \text{ mins}} = 2.56 \text{ lb/event} \end{aligned}$$

EMISSION CALCULATIONS FOR COMBUSTION TURBINE

Pacifico Spunky LLC - Solar T-350

Table 5: Proposed Emissions for Each Combustion Turbine

Fuel	Hours of Operation ¹		CO ²		NO _x ²		VOC ²		PM ³		PM ₁₀ /PM _{2.5} ³		SO ₂ ^{3,4}		H ₂ SO ₄ ³		HCHO ³	
	(hrs/yr)		(lb/hr)	(tpy)	(lb/hr)	(tpy)	(lb/hr)	(tpy)	(lb/hr)	(tpy)	(lb/hr)	(tpy)	(lb/hr)	(tpy)	(lb/hr)	(tpy)	(lb/hr)	(tpy)
Natural Gas	Normal	8,755	3.41	14.93	2.24	9.81	1.95	8.54	3.08	13.49	3.08	13.49	0.55	2.43	0.13	0.57	0.08	0.36
	SUSD	5	179.56	0.45	19.68	0.05	12.46	0.03										
Total Calculated		8,760		15.38		9.86		8.57		13.49		13.49		2.43		0.57		0.36

¹ The operating scenarios represented in the table are for maximum potential emissions estimation purposes only. These operating scenarios shall not be used to limit the maximum hours of operation, number of SUSD events or amount of natural gas firing. Pacifico Power will track actual operations to demonstrate compliance with the emission limits in the permit.

² Emissions of NO_x, CO and VOC are calculated based on estimated hours of operation in each mode (normal vs. SUSD).

³ Emissions of PM, PM₁₀, PM_{2.5}, SO₂, H₂SO₄, HCHO and CO₂ during SUSD events are assumed to be no more than the emissions from normal operations.

⁴ SO₂ emissions for natural gas combustion are calculated based on the maximum annual sulfur content of natural gas as follows:

SO₂ Annual Emissions (tpy) =

0.5 gr S	lb	396.44 MMBtu	10 ⁶ Btu	1 scf	64.06 lb SO ₂	1 lb-mole S	8760 hrs	ton	=	2.43 tpy
100 scf		7,000 gr	1 hr	1 MMBtu	1,020 btu	1 lb-mole SO ₂	32.06 lb S	yr		2,000 lb

Table 6: Proposed HAP Emissions per Combustion Turbine

Pollutant	Emission Factors ^{1, 2}	Hourly Emissions per Turbine ²	Annual Emissions per Turbine ³
	Natural Gas		
	(lb/MMBtu)	(lb/hr)	(tpy)
1,3-Butadiene	4.30E-07	1.70E-04	7.47E-04
Acetaldehyde	4.00E-05	0.02	0.07
Acrolein	6.40E-06	2.54E-03	0.01
Benzene	1.20E-05	4.76E-03	0.02
Ethylbenzene	3.20E-05	0.01	0.06
Formaldehyde ⁴	2.10E-04	0.08	0.36
Naphthalene	1.30E-06	5.15E-04	2.26E-03
PAH	2.20E-06	8.72E-04	3.82E-03
Propylene Oxide	2.90E-05	0.01	0.05
Toluene	1.30E-04	0.05	0.23
Xylene	6.40E-05	0.03	0.11
Total HAPs (tpy)			0.92
Maximum Single HAP (tpy)			0.36

¹ Emission factors for natural gas combustion obtained from U.S. EPA, AP-42, Section 3.1 *Stationary Gas Turbines*, Table 3.1-3 *Emission Factors for Hazardous Air Pollutants from Natural Gas-Fired Stationary Gas Turbines*.

² Hourly Emissions per Unit (lb/hr) = Emission Factor (lb/MMBtu) * Maximum Fuel Input Rate (MMBtu/hr)

Hourly Emission Rate for Formaldehyde per Turbine (lb/hr) =

2.1E-04 lb	396.4 MMBtu	=	0.08 lb/hr
(Natural Gas Combustion)	MMBtu	hr	

³ Annual Emissions per Turbine for Natural Gas (tpy) = Maximum Hourly Emission Rate for Natural Gas (lb/hr) * Total Annual Operating Hours for Natural Gas (hrs/yr) / 2,000 (lb/ton)

Annual HAP Emission Rate for Formaldehyde per Turbine (tpy) =

0.08 lb	8,760 hrs	1 ton	=	0.36 tpy
(Natural Gas Combustion)	hr	yr	2,000 lbs	

⁴ Emission factor for formaldehyde from the turbine emission estimates provided by Pacifico Power to Trinity Consultants via email on May 5, 2025.

APPENDIX B. EMISSION SPECIFICATION SHEETS (CONFIDENTIAL)
