

Air Quality Standard Permit for Electric Generating Units Application

**El Paso Datacenter - EGUs
El Paso, El Paso County, Texas**

CN606225175

**Submitted by:
Enchanted Rock LLC**

October 2025



ENCHANTED ROCK
The Power is On.

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SECTION 1 - INTRODUCTION

Enchanted Rock LLC (Enchanted Rock) is providing this registration to the Texas Commission on Environmental Quality (TCEQ) to authorize the construction and operation of an electric generating facility under Standard Permit number 6005. Enchanted Rock is filing this registration pursuant to the requirements in Texas Administrative Code (TAC) Title 30, Chapter 116, Subchapter F.

This standard permit registration is to authorize the El Paso Datacenter EGUs Plant to provide power via natural gas-powered spark ignition reciprocating engines year-round.

1.1 Facility Information

Enchanted Rock (ERock) is proposing to install a 225MW-PRP 34.5kV prime power plant (El Paso Datacenter EGUs) to meet bridge power demand at the Meta El Paso datacenter in El Paso, TX.

Project Information	
Project Name	El Paso Datacenter
Location	31.992278°N, 106.366070°W
Project County	El Paso
Nonattainment Classification for Ozone	Marginal
Nonattainment Classification for PM10	Moderate
Nonattainment Classification for PM2.5	Attainment

Prime power will be provided by ERock during the initial bridge power period of 3-5 years until utility power is available. Once utility power has been established, Enchanted Rock generation will operate in a flex power mode with reduced run hours. This application is being submitted for the bridge power period, and a subsequent permit amendment will be submitted to address the expected change in operations.

The El Paso Datacenter EGUs will be following the demand of the site load which will never exceed 225MW at its peak. Thus, the output of the plant will always remain at 225MW or below. To serve this demand, Enchanted Rock will install a total of 813 natural gas-fired rich-burn generators with a nameplate capacity of 450kWe prime power rating.

ERock will provide eight (8) 35kV Switchgear as a means of balancing the generation capacity per switchgear. Each of the 35kv Switchgear will contain a Bridge Power Feeder breaker meant to feed the load switchgear. The ERock power plant will serve only the datacenter directly during the bridge power period.

All units will be identical, and as a result, a single form for TCEQ Table 29 has been provided for the engines.

The proposed El Paso Datacenter EGUs Plant will be located at 31.992278°N, 106.366070°W.

1.2 Application Contents

This application is organized into the following sections:

- Section 1.3 contains the TCEQ Core Data Form and form PI-1S. The registration fee has been paid electronically using TCEQ's ePay system.

- Section 2 contains the El Paso Datacenter EGUs aerials and site layout.
- Section 3 provides the process description and process flow diagram.
- Section 4 discusses the air emissions for the project.
- Section 5 provides the air impacts analysis.
- Section 6 discusses the regulations applicable to the standard permit registration.
- Appendix A provides the emission rate estimate calculations.
- Appendix B provides the manufacturer's data sheets.
- Appendix C provides TCEQ Table 29.
- Appendix D provides emissions test data

1.3 TCEQ Application Forms

This section contains the following completed forms and documentation as required for the Standard Permit registration:

- TCEQ Core Data Form, and
- TCEQ Form PI-1S – Registrations for Air Standard Permit, and
- Expedited Review Form



TCEQ Use Only

TCEQ Core Data Form

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

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)	Follow this link to search for CN or RN numbers in Central Registry**	3. Regulated Entity Reference Number (if issued)
CN 606225175		RN

SECTION II: Customer Information

4. General Customer Information		5. Effective Date for Customer Information Updates (mm/dd/yyyy)			
☐ 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)					
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).					
6. Customer Legal Name (If an individual, print last name first: eg: Doe, John)				<i>If new Customer, enter previous Customer below:</i>	
7. TX SOS/CPA Filing Number		8. TX State Tax ID (11 digits)		9. Federal Tax ID (9 digits)	
				10. DUNS Number (if applicable)	
11. Type of Customer:		☐ Corporation		☐ Individual	
				Partnership: ☐ General ☐ Limited	
Government: ☐ City ☐ County ☐ Federal ☐ State ☐ Other		☐ Sole Proprietorship		☐ Other:	
12. Number of Employees				13. Independently Owned and Operated?	
☐ 0-20 ☐ 21-100 ☐ 101-250 ☐ 251-500 ☐ 501 and higher				☐ 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					
☐ Occupational Licensee ☐ Responsible Party ☐ Voluntary Cleanup Applicant ☐ Other:					
15. Mailing Address:	1113 Vine Street, Ste 101				
	City	Houston	State	TX	ZIP 77002
		ZIP + 4			
16. Country Mailing Information (if outside USA)				17. E-Mail Address (if applicable)	
18. Telephone Number		19. Extension or Code		20. Fax Number (if applicable)	
() -				() -	

SECTION III: Regulated Entity Information

21. General Regulated Entity Information (If 'New Regulated Entity' is selected below this form should be accompanied by a permit application)	
☒ 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 Agency Data Standards (removal of organizational endings such as Inc, LP, or LLC.)</i>	
22. Regulated Entity Name (Enter name of the site where the regulated action is taking place.)	
El Paso Datacenter EGUs	

23. Street Address of the Regulated Entity: (No PO Boxes)								
	City		State		ZIP		ZIP + 4	
24. County	El Paso							
Enter Physical Location Description if no street address is provided.								
25. Description to Physical Location:								
26. Nearest City					State		ZIP Code	
El Paso					TX		79934	
27. Latitude (N) In Decimal:		31.995472			28. Longitude (W) In Decimal:		106.348278	
Degrees	Minutes	Seconds	Degrees	Minutes	Seconds			
31	59	43.70	106	20	53.80			
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? (Do not repeat the SIC or NAICS description.)								
Electric Power Generation								
34. Mailing Address:	1113 Vine Street, Ste 101							
	City	Houston	State	TX	ZIP	77002	ZIP + 4	
35. E-Mail Address:		ddelafosse@enchantedrock.com						
36. Telephone Number			37. Extension or Code			38. Fax Number (if applicable)		
(713) 412-2225						() -		

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	☐ Waste Water	☐ Wastewater Agriculture	☐ Water Rights	☐ Other:

SECTION IV: Preparer Information

40. Name:	Taylor DeLaFosse			41. Title:	Environmental Compliance Manager		
42. Telephone Number	43. Ext./Code	44. Fax Number	45. E-Mail Address				
713 - 412 - 2225		() -	ddelafosse@enchantedrock.com				

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:	Enchanted Rock LLC	Job Title:	Sr. Manager, Environmental Compliance		
Name(In Print) :	Taylor DeLaFosse			Phone:	713-412-2225
Signature:	Signed Electronically via STEERS			Date:	

**Texas Commission on Environmental Quality
Form PI-1S**

**Registrations for Air Standard Permit
(Page 1)**

I. Registrant Information			
A. Company or Other Legal Customer Name:			
Enchanted Rock LLC			
B. Company Official Contact Information (☒ Mr. ☐ Mrs. ☐ Ms. ☐ Other:)___			
Name: Taylor DeLaFosse			
Title: Environmental Compliance Manager			
Mailing Address: 1113 Vine Street, Ste 101			
City: Houston	State: TX	ZIP Code: 77002	
Phone: 713-412-2225		Fax:	
E-mail Address: ddelafosse@enchantedrock.com			
<i>All permit correspondence will be sent via e-mail.</i>			
C. Technical Contact Information (☒ Mr. ☐ Mrs. ☐ Ms. ☐ Other:)___			
Name: Taylor DeLaFosse			
Title: Environmental Compliance Manager			
Company Name: Enchanted Rock LLC			
Mailing Address: 1113 Vine Street, Ste 101			
City: Houston	State: TX	ZIP Code: 77002	
Phone: 713-412-2225		Fax:	
E-mail Address: ddelafosse@enchantedrock.com			
II. Facility and Site Information			
A. Name and Type of Facility			
Facility Name: El Paso Datacenter EGUs			
Type of Facility:		☒ Permanent ☐ Temporary	
For portable units, please provide the serial number of the equipment being authorized below.			
Serial No:		Serial No:	

TCEQ-10370 (APDG 5235v27, Revised 03/18) PI-1S
This form is for use by facilities subject to air quality permit requirements
and may be revised periodically.

Texas Commission on Environmental Quality
Form PI-1S
Registrations for Air Standard Permit
(Page 2)

II. Facility and Site Information (<i>continued</i>)		
B. Facility Location Information		
Street Address:		
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: El Paso	County: El Paso	ZIP Code: 79934
Latitude (nearest second): 31.995472		Longitude (nearest second): -106.348278
C. Core Data Form (required for Standard Permits 6004, 6006, 6007, 6008, and 6013).		
Is the Core Data Form (TCEQ Form 10400) attached?		☒ YES ☐ NO
If "NO," provide customer reference number (CN) and regulated entity number (RN) below.		
Customer Reference Number (CN): CN606225175		
Regulated Entity Number (RN):		
D. TCEQ Account Identification Number (if known):		
E. Type of Action:		
☒ Initial Application ☐ Change to Registration ☐ Renewal ☐ Renewal Certification		
For Change to Registration, Renewal, or Renewal Certification actions provide the following: N/A		
Registration Number:		Expiration Date:
F. Standard Permit Claimed: 6005 – Air Quality 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 and PBR Registration Number(s)		Effective Date

Texas Commission on Environmental Quality
Form PI-1S
Registrations for Air Standard Permit
(Page 3)

II. Facility and Site Information (<i>continued</i>)		
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), and Standard Permit registration number(s), and associated effective date in the spaces provided below.		
Standard Exemption, PBR Registration, and Standard Permit Registration Number(s)		Effective Date
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. Concrete Batch Plant		
☐ Central Mix ☐ Ready Mix ☐ Specialty Mix ☐ Enhanced Controls for Concrete Batch Plants		
1. State Legislators		
State Senator:		
State Representative:		
2. County Judge		
Name:		
Mailing Address:		
City:	State:	ZIP Code:

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 and may be revised periodically.

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Registrations for Air Standard Permit
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II. Facility and Site Information (continued)		
K. 3. Presiding Officer		
Is the facility located in a municipality or extraterritorial jurisdiction of a municipality?		☐ YES ☐ NO
If "YES," list the name of the Presiding Officer for the municipality and/or extraterritorial jurisdiction:		
Presiding Officer Name:		
Title:		
Mailing Address:		
City:	State:	ZIP Code:
L. Federal Operating Permit (FOP) Requirements		
Is this facility located at a site that is required to obtain an FOP pursuant to 30 TAC Chapter 122?		☐ YES ☒ NO ☐ To Be Determined
If the site currently has an existing FOP, enter the permit number: N/A		
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 an FOP ☐ Significant Revision for an SOP ☐ Minor Revision for an SOP ☐ Operational Flexibility/Off Permit Notification for an 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 ☐ GOP ☐ GOP application/revision (submitted or under APD review) ☒ N/A ☐ SOP application/revision (submitted or under APD review)		
III. Fee Information (see Section IX. for address to send fee or go to www.tceq.texas.gov/epay to pay online)		
A. Fee Amount: \$TBD (Expedited Permit Request)		
B. Payment Information		
Check/money order/transaction or voucher number: TCEQ ePay Voucher		
Individual or company name on check: Enchanted Rock		
Was fee paid online?		☒ YES ☐ NO

Texas Commission on Environmental Quality
Form PI-1S
Registrations for Air Standard Permit
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IV. Public Notice (if applicable)		
A. Responsible Person (☐ Mr. ☐ Mrs. ☐ Ms. ☐ Other:) _____		
Name:		
Title:		
Company:		
Mailing Address:		
City:	State:	ZIP Code:
Phone:	Fax No.:	
E-mail Address:		
B. Technical Contact (☐ Mr. ☐ Mrs. ☐ Ms. ☐ Other:) _____		
Name:		
Title:		
Company:		
Mailing Address:		
City:	State:	ZIP Code:
Phone No.:	Fax No.:	
E-mail 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?		

Texas Commission on Environmental Quality
Form PI-1S
Registrations for Air Standard Permit
(Page 6)

IV. Public Notice (if applicable) (continued)	
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
E. For Concrete Batch Plants	
1. Public Works Project: Will the plant provide concrete to a public works project, and be located in or contiguous to the right of-way of the public works project? (If "YES," public notice is not required.)	☐ YES ☐ NO
2. Application in Public Place	☐ YES ☐ NO
Name of Public Place:	
Physical Address:	
City:	County:
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 (See Note Below)
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

Note: This registration is an initial registration and not for the renewal of an existing registration. Therefore, this section does not apply.

Texas Commission on Environmental Quality
Form PI-1S
Registrations for Air Standard Permit
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V. Renewal Certification Option (<i>continued</i>)	
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 shutdown 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>	
<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.</i>	
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 Sections 116.610 and 116.615 are met?	☒ YES ☐ NO
Did you demonstrate that emission limitations in 30 TAC Sections 106.261 and 106.262 are met?	☐ YES ☐ NO (Not Applicable)
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

TCEQ-10370 (APDG 5235v27, Revised 03/18) PI-1S
This form is for use by facilities subject to air quality permit requirements and may be revised periodically.

Texas Commission on Environmental Quality
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VI. Technical Information Including State and Federal Regulatory Requirements (*continued*)

Place a check next to the appropriate box to indicate what you have included in your submittal.

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.

G. Projected Start Of Construction Date, Start Of Operation Date, and Length of Time at Site: ☒ YES ☐ NO

Projected Start of Construction (provide date): **08/2026**

Projected Start of Operation (provide date): **TBD (Q1/Q2 2027)**

Length of Time at the Site: **N/A**

VII. Delinquent Fees and Penalties

This form **will not be processed** until all delinquent fees and/or penalties owed to the TCEQ or the Office of the Attorney General on behalf of the TCEQ are paid in accordance with the Delinquent Fee and Penalty Protocol. For more information regarding Delinquent Fees and Penalties, go to the TCEQ Web site at: www.tceq.texas.gov/agency/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, 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): **Taylor DeLaFosse**

Signature (original signature required): **Signed Electronically via STEERS**

Date:

Expedited Review Form

Form APD-EXP Expedited Permitting Request

I. Contact Information	
Company or Other Legal Customer Name: Enchanted Rock, LLC	
Customer Reference Number (CN): CN606225175	
Regulated Entity Number (RN): TBD	
Company Official or Technical Contact Name: Taylor DeLaFosse	
Phone Number: 713-412-2225	
Email: ddelafosse@enchantedrock.com	
II. Project Information	
Facility Type: Power Plant	
Permit Number: NA	
Project Number: NA	
III. Economic Justification	
The purpose of the application associated with this request to expedite will benefit the economy of this state or an area of this state.	☐ YES ☒ NO
IV. Delinquent Fees and Penalties	
Applications will not be expedited if any delinquent fees and/or penalties are owed to the TCEQ or the Office of the Attorney General on behalf of the TCEQ. For more information regarding Delinquent Fees and Penalties, go to the TCEQ Web site at: www.tceq.texas.gov/agency/delin/index.html .	
V. Signature	
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. As the applicant, I commit to fulfilling all expectations of the expedited permitting program and application requirements promptly. Failure to meet any expectation or requirement may cause my application to be removed from the expedited permitting program and possibly voided at the discretion of the TCEQ Executive Director. 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: Taylor DeLaFosse	
Signature: Signed Electronically via STEERS	
Date: 10/2/2025	

Reset Form

Copy of Payment Fees

Standard Permit registration fee payment and registration submittal were made via STEERS.

SECTION 2 - SITE LAYOUT & AERIALS

Site layout and aerials showing the location of the El Paso Datacenter are included as Figure 2-1, Figure 2-2 and Figure 2-3.

Figure 2-1 Zoomed In Aerial



Figure 2-2 Zoomed Out Aerial

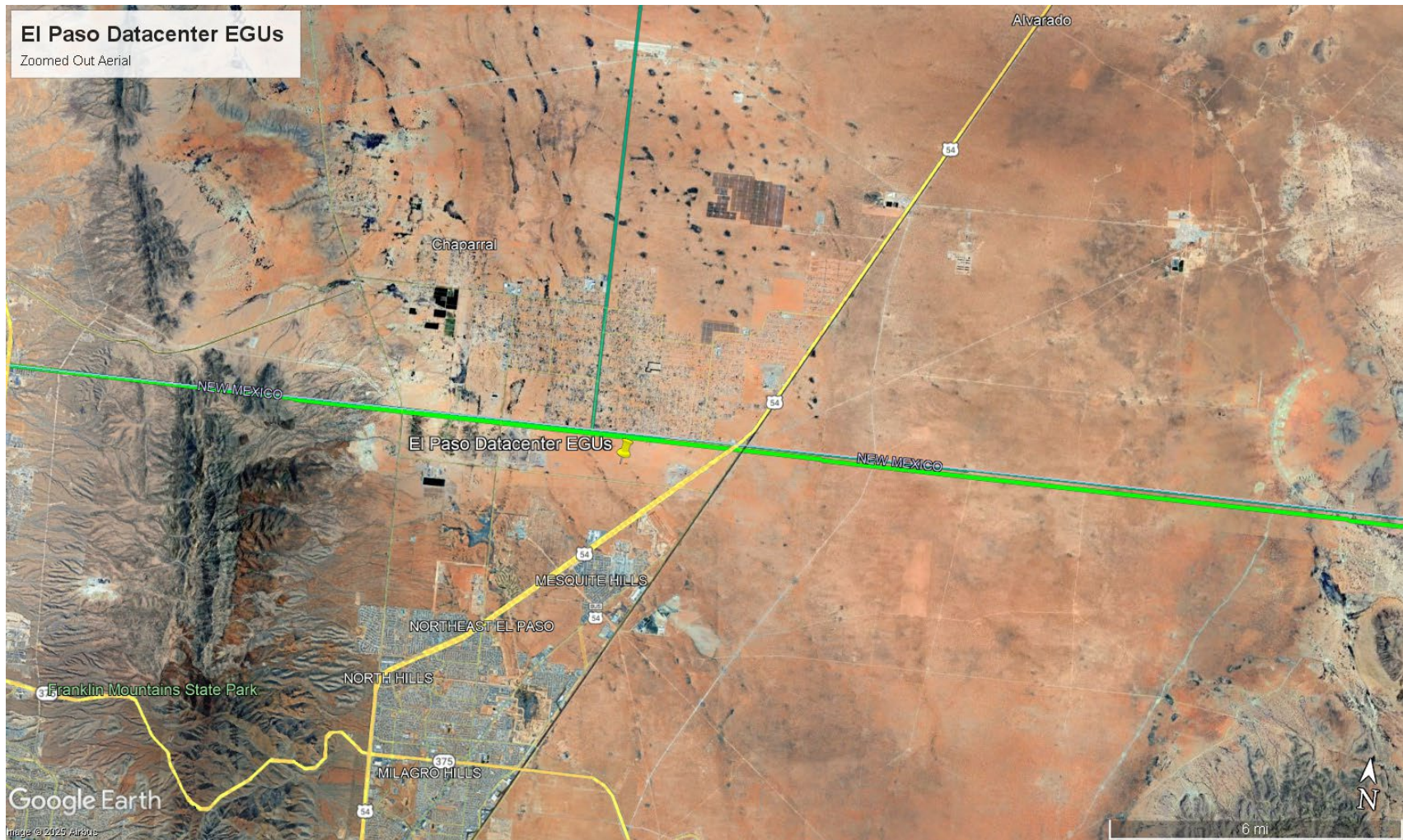
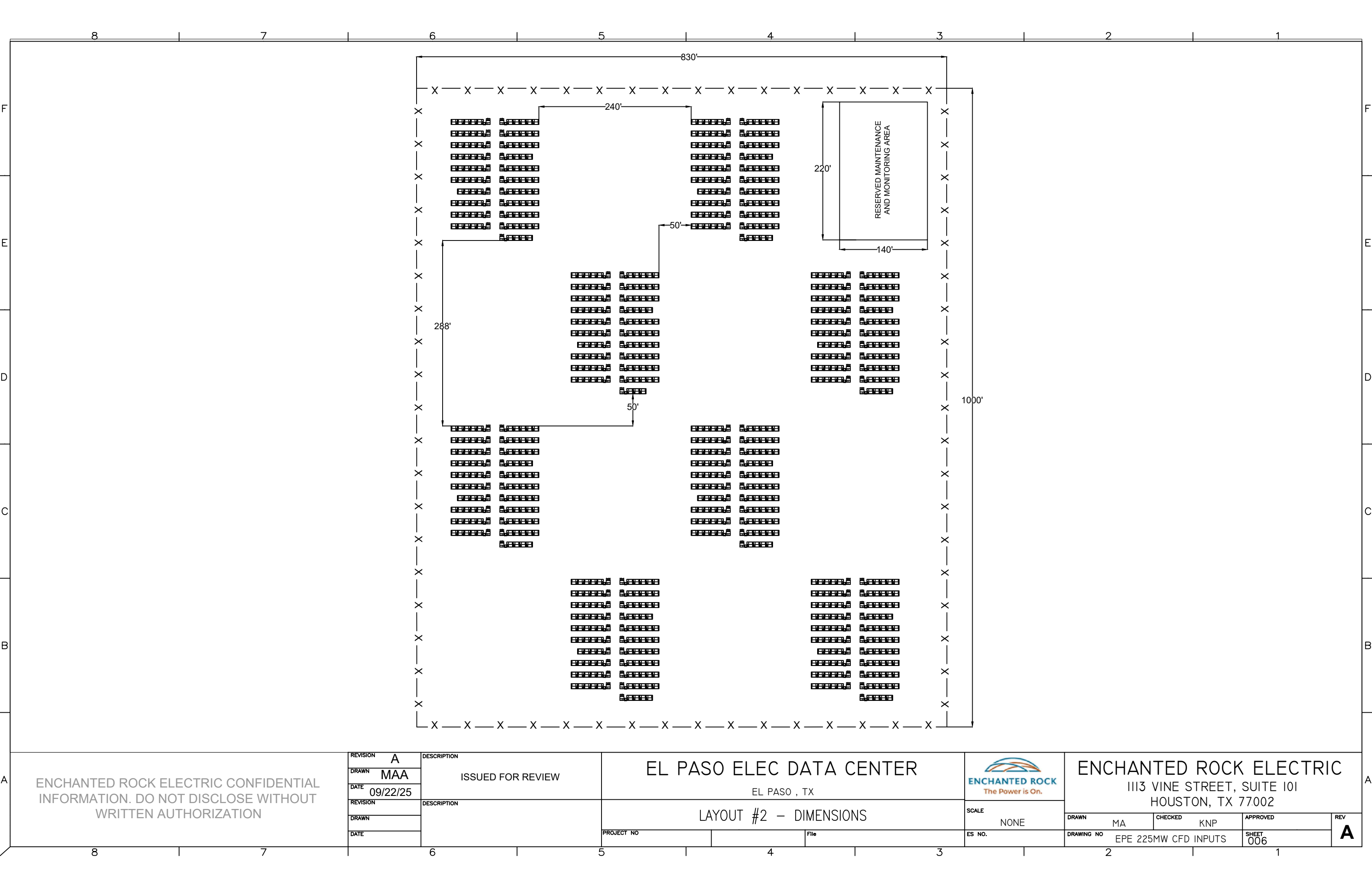


Figure 2-3 Facility Layout



ENCHANTED ROCK ELECTRIC CONFIDENTIAL
INFORMATION. DO NOT DISCLOSE WITHOUT
WRITTEN AUTHORIZATION

REVISION	A
DRAWN	MAA
DATE	09/22/25
REVISION	
DRAWN	
DATE	

DESCRIPTION	ISSUED FOR REVIEW
DESCRIPTION	

EL PASO ELEC DATA CENTER		
EL PASO , TX		
LAYOUT #2 – DIMENSIONS		
PROJECT NO		File

	
SCALE	NONE
ES NO.	

ENCHANTED ROCK ELECTRIC			
1113 VINE STREET, SUITE 101			
HOUSTON, TX 77002			
DRAWN	MA	CHECKED	KNP
APPROVED			
DRAWING NO	EPE 225MW CFD INPUTS	SHEET	006
REV	A		

SECTION 3 - PROCESS DESCRIPTION

The El Paso Datacenter EGUs Plant will be an electric generating power plant that will burn natural gas in spark ignition reciprocating engines to produce electricity for use by the onsite datacenter. The proposed plant will operate year-round as a prime power resource. ERock will control operations of the generators and will be responsible for all maintenance and operational activities for the plant.

The El Paso Datacenter EGUs Plant will only use sweet natural gas, which will be delivered to the site via pipeline.

ERock will actively manage the generator output through the generator controllers onsite. The Peak Load output for the site will be 225MW and the rolling 24-hr average load output will be 213.75MW. This site load will be shared across the generator fleet, and the expected individual generator load at any time will be 285kW_e-300kW_e. Maintenance activities, as discussed in Section 3.1, will leave each generator down periodically multiple times each year. Thus, expected actual runtime for each generator is <8,000 hr/yr.

The El Paso Datacenter EGUs are expected to have 4 major levels of control over the generation that will be under the control of ERock. These are the following: 1. Generator Controller, 2. Group Controller, 3. Switchgear Controller, and 4. Plant Controller.

These are further explained below.

1. Generator Controller

Each 450kW-PRP genset is equipped with a generator controller. This generator controller is in direct control of each generator output breaker.

2. Group Controller

Each group of generators (~34) will have one group controller that serves as a load sharing controller between the group of generators. This controller commands each Generator Controller and will have control of one 35kV generator breaker that connects the entire group to a 35kV switchgear.

3. Switchgear Controller

Each 35kV switchgear will have a controller that manages the breaker positions of the output breakers. Each Switchgear Controller manages the mode of operation for each Group Controller.

4. Plant Controller

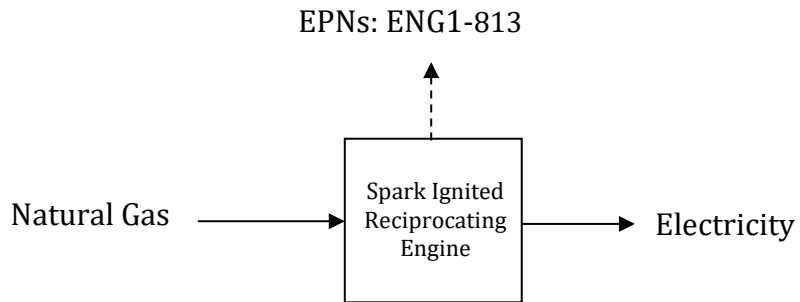
There will be one site master controller known as the Plant Controller that manages each Switchgear Controller. This Controller will have ultimate control and oversight for the power that is generated and output from the El Paso Datacenter EGUs Plant.

3.1 Maintenance Activities

Maintenance of the site will be an ongoing activity and will be conducted through a phased approach. A total of 62 generators will always be designated as “Maintenance Gens” and will offline for maintenance activities leaving a total of 751 generators to operate. These designated generators will be strategically rotated throughout the year to ensure

operational integrity of all systems, including emissions controls. Each generator is planned to have 8 scheduled starts per year.

Routine MSS activities are included in the emissions calculations.



LEGENDS:

- - - - Air Emissions or Exhaust

NOTE:

Figure 3-1 Process Flow Diagram

Air Quality Standard Permit Registration

El Paso, El Paso County, TX

Enchanted Rock LLC.

El Paso Datacenter EGUs



Project Number

EPDC001

SECTION 4 - AIR EMISSIONS SUMMARY

This section describes the air emission calculation methodologies used to estimate hourly and annual emission rates for the facilities and activities represented in this standard permit registration. Detailed emission rate estimate calculations are confidential and provided in the tables located in Appendix A which is submitted under a separate confidential cover. The following discussion is limited to a general description of the calculation methodology and a summary of key assumptions and calculation basis data.

Emissions of air contaminants are estimated for each facility using vendor specifications, mass balance calculations, and emission factors appropriate to the facility type from the Environmental Protection Agency's (EPA's) "Compilation of Air Pollutant Emission Factors" (AP-42).

ERock has provided additional test data in Appendix C to demonstrate emission factor achievability.

This application is proposing to permit the El Paso Datacenter EGUs as a group establishing sitewide limits rather than individual gen limits.

4.1 Spark Ignited Reciprocating Internal Combustion Engines

The SI RICE at the El Paso Datacenter EGUs Plant are fired with sweet natural gas. Products of combustion from the engines include the following criteria and non-criteria pollutants: NO_x, CO, VOC, sulfur dioxide (SO₂), particulate matter (PM) with diameters less than 10 microns (PM₁₀), particulate matter with diameters less than 2.5 microns (PM_{2.5}), and Hazardous Air Pollutants (HAPs). Table 4-1 provides a summary of the short-term and annual emission rates for each engine and total sitewide emissions including contributions from MSS emissions.

NO_x, CO, VOC, and PM emissions from normal operations are estimated using the manufacturer guaranteed emission factors. ERock has designed the ERT500A to meet California Air Resource Board Distributed Generation (CARB DG) emissions standards. Laboratory emissions testing data has been provided in Appendix C. ERock has also provided emissions testing data for PM emissions that was taken during a stack test at an ERock test facility. The test results can also be found in Appendix C.

SO₂ emissions and all planned MSS emissions are estimated using emission factors in EPA's AP-42, Table 3.2-3 and estimated fuel consumption. SO₂ emissions are estimated via mass balance based on the sulfur fuel content with the assumption that 100% of sulfur in the fuel is converted to SO₂ and emitted. All planned MSS emissions are estimated using the unit fuel consumption at 300 kW_e. Example calculations have been provided in Appendix B.

Estimated HAP emissions have been provided to demonstrate the site remains below major source thresholds. HAP emissions are conservatively estimated with fuel consumption rates based on all 813 generators operating full time at the anticipated generator load of 300 kW_e/generator. All HAP emissions are estimated using emission factors from EPA's AP-42, Table 3.2-3 and the aforementioned estimated fuel consumption with a conservative reduction rate of 85% applied. Based on manufacturer data, the ERock 3-way catalyst can achieve up to 95% reduction for VOCs. The lone exception to this methodology is

Formaldehyde. ERock used emissions test data was for the estimate of Formaldehyde emissions. A copy of the test report and a summary of results can be found in Appendix C.

Emissions estimates in this application conservatively estimate generator run time to be 8,760 hr/yr. Actual runtime for each generator is expected to be <8,000 hr/yr.

Hourly and annual emission calculations for engines 1-813 are provided in Appendix A.

Site Generation Information	
Number of Generators	813
Installed Nameplate Capacity	365.85 MW _e (PRP)
Location-Specific Installed Capacity	330.9 MW _e (PRP)
Maximum Site Load	225 MW _e
Average Site Load	213.75 MW _e
Maintenance Gens	62
Expected Number of Gens Running	751
Expected Normal Run Hrs per Gen	<8,000 hr/yr
Proposed Permitted Normal Run Hrs per Gen	8,760 hr/yr
Proposed Permitted MSS Hours per Site	677.5 hr/yr
Typical Gen Load	300 kW _e
Site Expected Fuel Consumption Rate	2,703,600 scfh
Site Expected Fuel Consumption Rate	2757.67 mmBtu/hr
Site Max Fuel Consumption Rate (for HAP Calcs)*	2985.34 mmBtu/hr

*Conservatively based on 813 gens at 300 kW_e

4.2 Maintenance Activities

Emissions from planned MSS are included in this application. Each generator will have 8 planned starts per year. Emissions from MSS activities are conservatively estimated at 10 planned starts per year for each generator.

Emissions from the generators can typically be controlled within 2 minutes after startup. This application conservatively estimates 5 minutes per start sequence.

MSS Emissions Basis	
Number of Starts per Gen per Year	10 starts/yr
Number of Starts per Site per Year	8,130 starts/yr
Length of Start Sequence	0.08 hr
Start Hours per Year	677.5 hr/yr
MSS Fuel Consumption Estimate*	2,487.78 mmBtu/yr

*Estimate at 300 kW_e

Table 4-1 Emissions Summary

El Paso Datacenter EGUs Estimated Emissions														
EPN(s) / Emission Sources	VOC		NO_x		CO		PM₁₀		PM_{2.5}		SO₂		HAPs	
	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy
Site Total:	4.51	18.76	16.44	68.36	23.57	97.99	11.26	46.84	11.26	46.84	2.25	9.36	4.67	20.46

SECTION 5 - REGULATORY APPLICABILITY

This section presents information demonstrating how Enchanted Rock's proposed El Paso Datacenter Plant will be in compliance with all rules and regulations of the TCEQ and the intent of the Texas Clean Air Act (TCAA), including applicable sections of 30 TAC §116. Subchapter F and the Standard Permit for Electric Generating Units. Each requirement is listed below (in italicized text) followed by a discussion of how the site meets the respective requirement.

5.1 State Regulatory Applicability

30 TAC Chapter 101, Subchapter A – General Rules

§101.2 Multiple Air Contaminant Sources or Properties –

Enchanted Rock does not intend to petition the TCEQ to have its property designated as a single property with any other property for the purposes of demonstrating compliance with TCEQ regulations and the control of air emissions.

§101.3 Circumvention –

Enchanted Rock intends to operate the facilities in accordance with the representations made in this air quality standard permit application.

§101.4 Nuisance –

Enchanted Rock will not discharge air contaminants in such concentration and of such duration that they will or may tend to be injurious to or adversely affect human health or welfare, animal life, vegetation, or property, or interfere with the normal use and enjoyment of animal life, vegetation, or property.

§101.5 Traffic Hazard –

No discharge of air contaminants, uncombined water or other materials from the project will cause or have a tendency to cause a traffic hazard or an interference with normal road use.

§101.8 Sampling –

All stack testing and sampling will meet requirements in §101.8 and data will be maintained and reported as required.

§101.9 Sampling Ports –

Enchanted Rock will comply with TCEQ requests regarding the location of sampling ports as required by §101.9.

§101.10 Emission Inventory Requirements –

Enchanted Rock will comply with all applicable TCEQ emission inventory requirements.

§101.20 Compliance with Environmental Protection Agency Standards –

As discussed below, Enchanted Rock will comply with the applicable New Source Performance Standards (40 CFR 60). The El Paso Datacenter EGUs Plant is not subject to the National Emission Standards for Hazardous Air Pollutants under 40 CFR 61 or 40 CFR 63, and is not subject to federal prevention of significant deterioration review.

§101.21 The National Primary and Secondary Ambient Air Quality Standards –
Enchanted Rock will comply with all National Ambient Air Quality Standards.

§101.24 Inspection Fees –
The El Paso Datacenter EGUs Plant is not subject to an inspection fee.

§101.27 Emission Fees –
The El Paso Datacenter EGUs Plant is not required to obtain a federal operating permit and therefore is not required to submit an emission fee.

30 TAC Chapter 101, Subchapter F – Emissions Events and Scheduled Maintenance, Startup, and Shutdown Activities

§101.201 Emissions Event Reporting and Recordkeeping Requirements –
Enchanted Rock will follow the notification, recordkeeping and reporting requirements in §101.201, should a reportable emissions event as defined in §101.1, occur.

§101.211 Scheduled MSS Reporting and Recordkeeping Requirements –
Enchanted Rock will comply with the MSS reporting and recordkeeping requirements in §101.211 applicable to the sources in this registration.

§101.221-§101.224 Operational Requirements, Demonstrations, and Actions to Reduce Excessive Emissions –
Enchanted Rock will comply with the requirements of these sections to the extent that they apply to the sources in this registration.

§101.231-§101.233 Variances –
Enchanted Rock reserves the right to petition for a variance, if necessary, following the procedures in §101.231-§101.233.

30 TAC Chapter 101, Subchapter H – Emissions Banking and Trading

The El Paso Datacenter EGUs Plant is located in El Paso County, which is not an affected county by the Mass Emissions Cap and Trade Program of Division 3 of this chapter. Division 4 of this chapter, related to Discrete Emission Credits is not applicable to sources in this application. The El Paso Datacenter EGUs Plant is not a source of HRVOC and is not subject to the requirements in Division 6. In January 2012, the Cross-State Air Pollution Rule (CSAPR) replaced the Clean Air Interstate Rule (CAIR) that Division 7 addresses. Enchanted Rock does not operate the types of facilities subject to Division 7.

30 TAC Chapter 101, Subchapter J – Expedited Permitting

Enchanted Rock is requesting TCEQ to expedite the processing of this registration and will file the appropriate paperwork and pay applicable fees for this process.

30 TAC Chapter 111 - Control of Air Pollution from Visible Emissions and Particulate Matter

§111.111(a) Requirements for Specified Sources –

Enchanted Rock will not allow visible emissions from any source, except as provided in this rule and will comply with all applicable visible emissions requirements.

§111.111(b) Compliance Determination Exclusions –

Enchanted Rock will not use contributions from uncombined water in determining compliance.

§111.111(c) Solid Fuel Heating Devices –

The El Paso Datacenter EGUs Plant will not heat solid fuel, therefore this rule is not applicable.

§111.151 Allowable Emission Limits –

The calculated emissions of total suspended particulates from all sources with specific stack flow rates are within the limits specified in §111.151, Table 1.

30 TAC Chapter 115, Control of Air Pollution from Volatile Organic Compounds

The The El Paso Datacenter EGUs Plant does not have any sources identified in Chapter 115. Therefore, these rules do not apply.

30 TAC §116.610 – Standard Permit Applicability

§116.610(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.

The following section shows how Enchanted Rock will meet this subchapter.

§116.610(a)(1)– Any project that results in a net increase in emissions of air contaminants from the project other than 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 the administrative requirements of the Air Quality Standard Permit for Electric Generating Units, this does not apply.

§116.610(a)(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.

Enchanted Rock will comply with this rule.

§116.610(a)(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 40 Code of Federal Regulations (CFR) Part 60, promulgated by the United States Environmental Protection Agency (EPA).

See Section 6.3 for applicability of Federal Regulations.

§116.610(a)(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 EPA.

See Section 6.3 for applicability of Federal Regulations.

§116.610(a)(5)– The proposed project must comply with the applicable maximum achievable control technology standards as listed under 40 CFR Part 63, promulgated by the 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 Part 63)).

See Section 6.3 for applicability of Federal Regulations.

§116.610(a)(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.

The El Paso Datacenter EGU Plant is not subject to the Mass Emissions Cap and Trade Program.

§116.610(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 El Paso Datacenter EGU Plant Project does not constitute a major source or modification.

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

Enchanted Rock will not circumvent applicable requirements.

§116.610(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.

Enchanted Rock does not have an affected source, as described.

30 TAC §116.611 – Registration to Use a Standard Permit

§116.611(a)– If required, registration to use a standard permit shall be sent by certified mail, return receipt requested, or hand delivered to the executive director, the appropriate

commission regional office, and any local air pollution program with jurisdiction, before a standard permit can be used. The registration must be submitted on the required form and must document compliance with the requirements of this section, including, but not limited to:

- (1) the basis of emission estimates;
- (2) quantification of all emission increases and decreases associated with the project being registered;
- (3) sufficient information as may be necessary to demonstrate that the project will comply with §116.610(b) of this title (relating to Applicability);
- (4) information that describes efforts to be taken to minimize any collateral emissions increases that will result from the project;
- (5) a description of the project and related process; and
- (6) a description of any equipment being installed.

Enchanted Rock will comply with this requirement.

§116.611(b)– Construction may begin any time after receipt of written notification from the executive director that there are no objections or 45 days after receipt by the executive director of the registration, whichever occurs first, except where a different time period is specified for a particular standard permit or the source obtains a prevention of significant deterioration permit for greenhouse gases as provided in §116.164(a) of this title (relating to Prevention of Significant Deterioration Applicability for Greenhouse Gases Sources).

Enchanted Rock will comply with this requirement.

§116.611(c)– In order to avoid applicability of Chapter 122 of this title (relating to Federal Operating Permits), a certified registration shall be submitted. The certified registration must state the maximum allowable emission rates and must include documentation of the basis of emission estimates and a written statement by the registrant certifying that the maximum emission rates listed on the registration reflect the reasonably anticipated maximums for operation of the facility. The certified registration shall be amended if the basis of the emission estimates changes or the maximum emission rates listed on the registration no longer reflect the reasonably anticipated maximums for operation of the facility. The certified registration shall be submitted to the executive director; to the appropriate commission regional office; and to all local air pollution control agencies having jurisdiction over the site. Certified registrations must also be maintained in accordance with the requirements of §116.115 of this title (relating to General and Special Conditions).

Enchanted Rock will comply with this requirement, as applicable.

§116.611(c)(1) – Certified registrations established prior to December 11, 2002, shall be submitted on or before February 3, 2003.

This subpart does not apply.

§116.611(c)(2) – Certified registrations established on or after December 11, 2002, shall be submitted no later than the date of operation.

Enchanted Rock will comply with this requirement, as applicable.

§116.611(c)(3) – Certified registrations established for greenhouse gases (as defined in §101.1 of this title (relating to Definitions)) on or after the effective date of EPA's final action

approving amendments to §122.122 of this title (relating to Potential to Emit) into the State Implementation Plan shall be submitted:

- (A) for existing sites that emit or have the potential to emit greenhouse gases, no later than 12 months after the effective date of EPA's final action approving amendments to §122.122 of this title as a revision to the Federal Operating Permits Program; or
- (B) for new sites that emit or have the potential to emit greenhouse gases, no later than the date of operation. Certified registrations established on or after December 11, 2002, shall be submitted no later than the date of operation.

Enchanted Rock is not certifying greenhouse gas emissions. This does not apply.

30 TAC §116.615 – General Conditions

§116.615(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

The emissions from the El Paso Datacenter EGU Plant will comply with all applicable rules and regulations of the commission.

§116.615(2) – Standard permit representations. All representations with regard to construction plans, operating procedures, 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). If the facility remains eligible for a standard permit, the owner or operator of the facility shall notify the executive director of any change in conditions which will result in a 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 as compared to the representations in the original registration or any previous notification of a change in representations. Notice of changes in representations must be received by the executive director no later than 30 days after the change.

All representations of construction plans, operating procedures, and maximum emission rates as represented in this application will be complied with. No change shall be made unless properly authorized under §116.110 of this title.

§116.615(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.

This application is not being submitted in lieu of a permit amendment.

§116.615(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.

Start of construction, construction interruptions exceeding 45 days and completion of construction shall be reported to the appropriate regional office no later than 15 days after occurrence of the event.

§116.615(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.

Enchanted Rock will notify the proper agencies of the commencement of operations at the El Paso Datacenter EGU's Plant.

§116.615(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 sampling of stacks or vents is required, the appropriate regional office and air pollution control agencies having jurisdiction shall be notified. The facility will only use approved sampling and testing procedures and will provide sampling facilities as well as conduct the sampling or contracting with an independent consultant.

§116.615(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.

Any alternatives to emission control, sampling, or other emission tests methods or monitoring that differ from the conditions of the standard permit will be

authorized by the executive director prior to their use in fulfilling permit requirements.

§116.615(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.

A copy of the standard permit as well as information and data sufficient to demonstrate applicability and compliance with the standard permit shall be maintained at the site or the nearest manned site and made available upon request by representatives of the executive director, the United States Environmental Protection Agency, or air pollution control agencies having jurisdiction.

§116.615(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).

No facilities authorized by this standard permit shall be operated unless all air pollution capture and abatement equipment is maintained in good working order and operating properly. Appropriate notification shall be made in accordance with §101.201 and §101.211 of this title.

§116.615(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.

Enchanted Rock will comply with applicable rules, regulations, and orders of the commission issued in conformity with the Texas Clean Air Act.

§116.615(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.*

No condition of the Air Quality Standard Permit for Electric Generating Units contains distance limitations, setbacks, or buffer zones.

30 TAC Chapter 117, Control of Air Pollution from Nitrogen Compounds

The El Paso Datacenter EGU Plant is located in the El Paso ozone nonattainment area which is not regulated under Chapter 117.

30 TAC Chapter 118, Control of Air Pollution Episodes

Enchanted Rock will implement all reasonably available emission reduction methods in the event of a Level I air pollution episode and will comply with the TCEQ directions to reduce or curtail emission rates in the event of a Level II episode.

30 TAC Chapter 122, Federal Operating Permits

The El Paso Datacenter EGU Plant does not include one or more of the sources listed in §122.120(1), and therefore is not subject to the requirements in Chapter 122.

5.2 Air Quality Standard Permit for Electric Generating Units

(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.*

This registration is authorizing electric generating units.

(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.*
- (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 (NOx) emissions that are less than 10*

- percent of the standards required by this standard permit. 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.*
- (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.*
- (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).*
- (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.*
- (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.*

The El Paso Datacenter EGUs Plant is being registered in accordance with section 116.611 with a PI-1S Form. A fee of \$900 plus expedited permitting fees accompany this registration. Written approval will be obtained before construction of the units begins. Applicable records shall be maintained and provided upon request. Gas Turbines do not power the units.

(4) General 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.*

Each electric generating unit installed will be certified by the manufacturer.

(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...

This section does not apply, as heat is not recovered for other processes.

(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.*

The fuel will be sweet natural gas.

(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:

- (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;

NO_x emissions are certified to be equal to or less than 0.1388 lb/MWh.

(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:....

El Paso Datacenter EGUs Plant units will meet this requirement.

(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).

El Paso Datacenter EGUs Plant units will not use the fuel described, therefore this 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.

Each engine will be re-certified as applicable.

(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.*

Enchanted Rock will comply with this section as applicable.

5.3 Federal Regulatory Applicability

A regulatory applicability analysis has been performed for 40 Code of Federal Regulations (CFR) parts 60, 61, and 63. The following sections contain potentially applicable regulations to the El Paso Datacenter EGU's Plant, along with how each will be met.

40 CFR Part 60 – Standards of Performance for New Stationary Sources

El Paso Datacenter EGU's Plant is subject to the requirements of 40 CFR Part 60 as discussed in the following section.

Subpart A – General Provisions

El Paso Datacenter EGU's Plant is subject to the requirements in §60.1 for obtaining a permit for affected facilities, §60.7 for notifications and recordkeeping of affected facilities, §60.11 for compliance with standards and maintenance requirements, and §60.19 for general notification and reporting requirements.

Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines

El Paso Datacenter EGU's Plant is subject to this subpart because the engines on site will certified natural gas burn, non-emergency stationary spark-ignited internal combustion engines with rated hp greater than 500, and manufactured after July 1, 2010. Enchanted Rock will comply with the below specified emission standards and all applicable requirements under this subpart.

Pollutant	Emission Standards (g/Hp-hr)
NO _x	1
CO	2
VOC	0.7

40 CFR Part 61 – National Emission Standards for Hazardous Air Pollutants

The El Paso Datacenter EGU Plant is not subject to the requirements of 40 CFR Part 61.

40 CFR Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories

Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

The El Paso Datacenter EGU Plant does have a stationary reciprocating internal combustion engine on site. The El Paso Datacenter EGU Plant will adhere to the requirements in §63.6590(c), which states that compliance is achieved by complying with all applicable requirements of 40 CFR 60 Subpart JJJJ.

APPENDIX A – EMISSION RATE CALCULATIONS

Emissions Calculations – Internal Combustion Engines

Pages 42-44 of this application contain confidential information and are submitted under a separate Confidential Information Cover.

APPENDIX B – MANUFACTURER’S DATA SHEETS

Manufacturer's Data Sheets

Pages 47-50 of this application contain confidential information and are submitted under a separate Confidential Information Cover

APPENDIX C – TCEQ TABLE 29



TCEQ Table 29 – Reciprocating Engines

I. Engine Data											
Manufacturer: Enchanted Rock		Model No. ERT500A		Serial No.		Manufacture Date:					
Rebuilds Date:		No. of Cylinders: 12		Compression Ratio:		EPN: ENG 813					
Application: ☐ Gas Compression ☒ Electric Generation ☐ Refrigeration ☐ Emergency/Stand by ☒ 4 Stroke Cycle ☐ 2 Stroke Cycle ☐ Carbureted ☒ Spark Ignited ☐ Dual Fuel ☐ Fuel Injected ☐ Diesel ☐ Naturally Aspirated ☐ Blower /Pump Scavenged ☐ Turbo Charged and I.C. ☐ Turbo Charged ☒ Intercooled ☐ I.C. Water Temperature ☐ Lean Burn ☒ Rich Burn											
Ignition/Injection Timing:				Fixed:		Variable: X					
Manufacture Horsepower Rating: 670				Proposed Horsepower Rating:							
Discharge Parameters											
Stack Height (Feet)		Stack Diameter (Feet)		Stack Temperature (°F)				Exit Velocity (FPS)			
II. Fuel Data											
Type of Fuel: ☐ Field Gas ☐ Landfill Gas ☐ LP Gas ☒ Natural Gas ☐ Digester Gas ☐ Diesel											
Fuel Consumption (BTU/bhp-hr): 8979.45				Heat Value: (HHV) 1019.7				(LHV)			
Sulfur Content (grains/100 scf - weight %):											
III. Emission Factors (Before Control)											
NO _x		CO		SO ₂		VOC		Formaldehyde		PM10	
lb/MWh	ppmv	lb/MWh	ppmv	lb/MWh	ppmv	lb/MWh	ppmv	lb/MWh	ppmv	lb/MWh	ppmv
Source of Emission Factors: ☒ Manufacturer Data ☐ AP-42 ☐ Other (specify): Equal or above manufacturer spec											
IV. Emission Factors (Post Control)											
NO _x		CO		SO ₂		VOC		Formaldehyde		PM10	
lb/MWh	ppmv	lb/MWh	ppmv	lb/MWh	ppmv	lb/MWh	ppmv	lb/MWh	ppmv	lb/MWh	ppmv
0.07		0.1		0.01		0.02		0.0031		0.05	
Method of Emission Control: ☒ NSCR Catalyst ☐ Lean Operation ☐ Parameter Adjustment ☐ Stratified Charge ☐ JLCC Catalyst ☐ Other (Specify): _____											
Note: Must submit a copy of any manufacturer control information that demonstrates control efficiency.											
Is Formaldehyde included in the VOCs?										☒ Yes ☐ No	
V. Federal and State Standards (Check all that apply)											
☒ NSPS JJJJ ☒ MACT ZZZZ ☐ NSPS IIII ☒ Title 30 Chapter 117 - List County: <u>Travis</u>											
VI. Additional Information											
1. Submit a copy of the engine manufacturer's site rating or general rating specification data. 2. Submit a typical fuel gas analysis, including sulfur content and heating value. For gaseous fuels, provide mole percent of constituents. 3. Submit description of air/fuel ratio control system (manufacturer information is acceptable).											

APPENDIX D – EMISSION TEST DATA

Emission Test Data

Pages 55-223 of this application contain confidential information, and is submitted under a separate Confidential Information Cover