

US EPA ARCHIVE DOCUMENT

Revised Prevention of Significant Deterioration Greenhouse Gas Permit Application for the Tenaska Roan's Prairie Generating Station

Prepared for
Tenaska Roan's Prairie Partners, LLC
Grimes County, Texas

March 3, 2014

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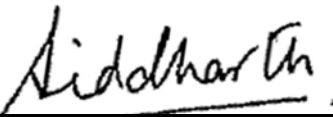
Revised Prevention of Significant Deterioration Greenhouse Gas Permit Application for the Tenaska Roan's Prairie Generating Station

March 3, 2014

Project No. 0189555
Tenaska Roan's Prairie Generating Station



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1.0

INTRODUCTION

Tenaska Roan's Prairie Partners, LLC (TRPP) submitted a permit application to the United States Environmental Protection Agency (USEPA) on July 22, 2013 to authorize the construction of a peaking power generation facility near Shiro in Grimes County, Texas. The Roan's Prairie Generating Station (RPGS) will provide up to 694 nominal gross megawatts (MW) of power to supplement the Electric Reliability Council of Texas (ERCOT) power grid during peak power demand. TRPP is proposing three simple cycle gas-fired turbines for power generation, one diesel-fired emergency generator and one diesel-fired fire pump engine. TRPP submitted responses to questions from the USEPA on January 14 and 21, 2014 and, at the request of the USEPA, this application is being submitted to incorporate those responses.

Per the Greenhouse Gas (GHG) tailoring rule published in the Federal Register on June 3, 2010, new sources having the potential to emit (PTE) GHG emissions 100,000 tons per year (tpy) or more of carbon dioxide equivalents (CO₂e) are subject to Prevention of Significant Deterioration (PSD) review under 40 CFR 52.21. Although the state of Texas is the delegated authority for New Source Review (NSR) and PSD under its State Implementation Plan (SIP) for criteria air pollutants, it has yet to revise its SIP to implement the GHG Tailoring Rule. On December 23, 2010, the USEPA signed the Federal Implementation Plan (FIP) authorizing the USEPA Region 6 to issue permits in Texas until approval of a SIP.

The PTE from the RPGS exceeds 100,000 tpy CO₂e. Therefore, the project is subject to PSD review for GHG emissions, and TRPP submits this application for a GHG PSD permit. This application includes a description of project scope, calculation of GHG emissions, and review of Best Available Control Technology (BACT). Further, the project triggers PSD for criteria air pollutants. As such, TRPP will be submitting an application for an air quality permit for construction to the Texas Commission on Environmental Quality (TCEQ) and a copy of this application will be submitted to USEPA Region 6 when available.

1.1

PROJECT PURPOSE AND DESCRIPTION

The RPGS is being designed as a natural gas-fueled power generating facility to serve the peaking segment of the ERCOT wholesale power market. This market segment is characterized by increases in daytime demand during the summer months, and relatively infrequent, high-demand "peak" periods that occur when demand is extraordinarily high and supply decreases substantially due to plants going off-line (including renewable wind resources). For example, between May 2011 and March 2013, there were more than 700 instances where the ERCOT load increased by more than 1,000 MW in less than 15 minutes. The high penetration of renewables in ERCOT also creates volatility and intermittency. During this same period, there were 100 instances per year where wind generation decreased by 400 MW or more in 15 minutes. Natural gas fueled peaking units, which are

capable of quickly providing supplemental power to the electric grid, are ideal for providing generation and load balancing against unanticipated or uncontrollable changes in load or generation. Peaking plants have traditionally been configured with simple cycle combustion units, and there is ample operational evidence showing that they can reliably meet peaking demand.

To meet this peak power demand, TRRP is proposing a power generation system that will include either three Siemens SGT6-5000F (5ee), GE 7FA.05, or GE 7FA.04 simple cycle turbines. Each unit will be limited to 33% capacity factor, approximately equivalent to 2,920 hours per year of operation at full load.

Peaking plants have traditionally been configured with simple cycle combustion units because they can achieve the necessary output quickly and can be shut down quickly when the peak demand abates. Although other technologies for producing the necessary power are available, they cannot meet demand quickly, are not designed for rapid load cycling, or are not cost-effective for the desired business purpose.

In addition, the RPGS will operate two emergency diesel-fired engines, one each to provide power for plant control systems in case of grid power loss and operate a fire pump in case of an emergency. As a simple cycle unit, this facility does not operate a steam turbine and has no requirements for a heat rejection system.

1.2

APPLICATION ORGANIZATION

This Technical Support Document and the enclosed application forms in Appendix A constitute the application for a permit to construct under 40 CFR 52.21 for the proposed RPGS. Please note that confidential information (Appendix E) is being submitted to the USEPA Region 6 under a separate cover.

The remainder of the application is organized as follows:

Section 2.0 – Site Location, Process Description, and Area Map

Section 3.0 – Federal Applicability to the Proposed Project

Section 4.0 – BACT and Lowest Achievable Emission Rate (LAER) Analyses

Section 5.0 – Emission Rate Calculations

Section 6.0 – Additional Requirements under PSD

Appendix A – Permit Application Forms

Appendix B – Emission Rate Calculations and Gas Turbine Data

Appendix C – Recently Issued Permits

Appendix D – Supporting Documentation

2.0 *SITE LOCATION AND PROCESS DESCRIPTION*

2.1 *SITE LOCATION*

The location of the proposed project is in Grimes County, Texas near Shiro. This location was chosen because it is proximate to existing natural gas supply and electricity transmission lines near the target market. The location is shown on the area and USGS maps provided as Figures 2-1 and 2-2, respectively.

2.2 *PROCESS DESCRIPTION*

The RPGS will be a peaking power production facility which will include three gas turbines, one diesel-powered emergency generator, and one diesel-powered fire pump engine.

There are various ancillary equipment and sub-systems included with the turbine package as well as balance of plant ("BOP") systems required for overall facility operation. The primary ancillary equipment and BOP systems include the generator and excitation system, starting package, inlet air system filter and silencer, exhaust transition piece electrical and control package, transformers, fuel gas delivery system, lube oil cooler system, lubricating oil package, fire protection, water wash system, and hydraulic oil skid.

During normal facility operation certain systems operate continuously while others operate as needed resulting in parasitic loads and/or losses. These parasitic loads are very small relative to the turbine gross output. These systems and equipment are not included or operated to increase efficiency but to allow for normal, safe and reliable operation of the turbines.

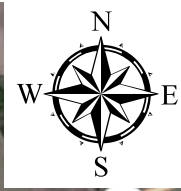
Gas Turbine (GT):

The three Siemens SGT6-5000F(5ee), GE 7FA.05, or GE 7FA.04 simple cycle turbines are the current basis for the process design. The gas turbines will combust natural gas exclusively and will be capable of generating a total nominal gross output of 507 to 694 MWe, depending upon turbine model and ambient conditions. Each combustion turbine will utilize low NO_x burners to minimize NO_x emissions. Each will be equipped with evaporative coolers to decrease the combustion air inlet temperature during high ambient temperatures, which results in increased turbine output.

Two Diesel-Fired Emergency Engines:

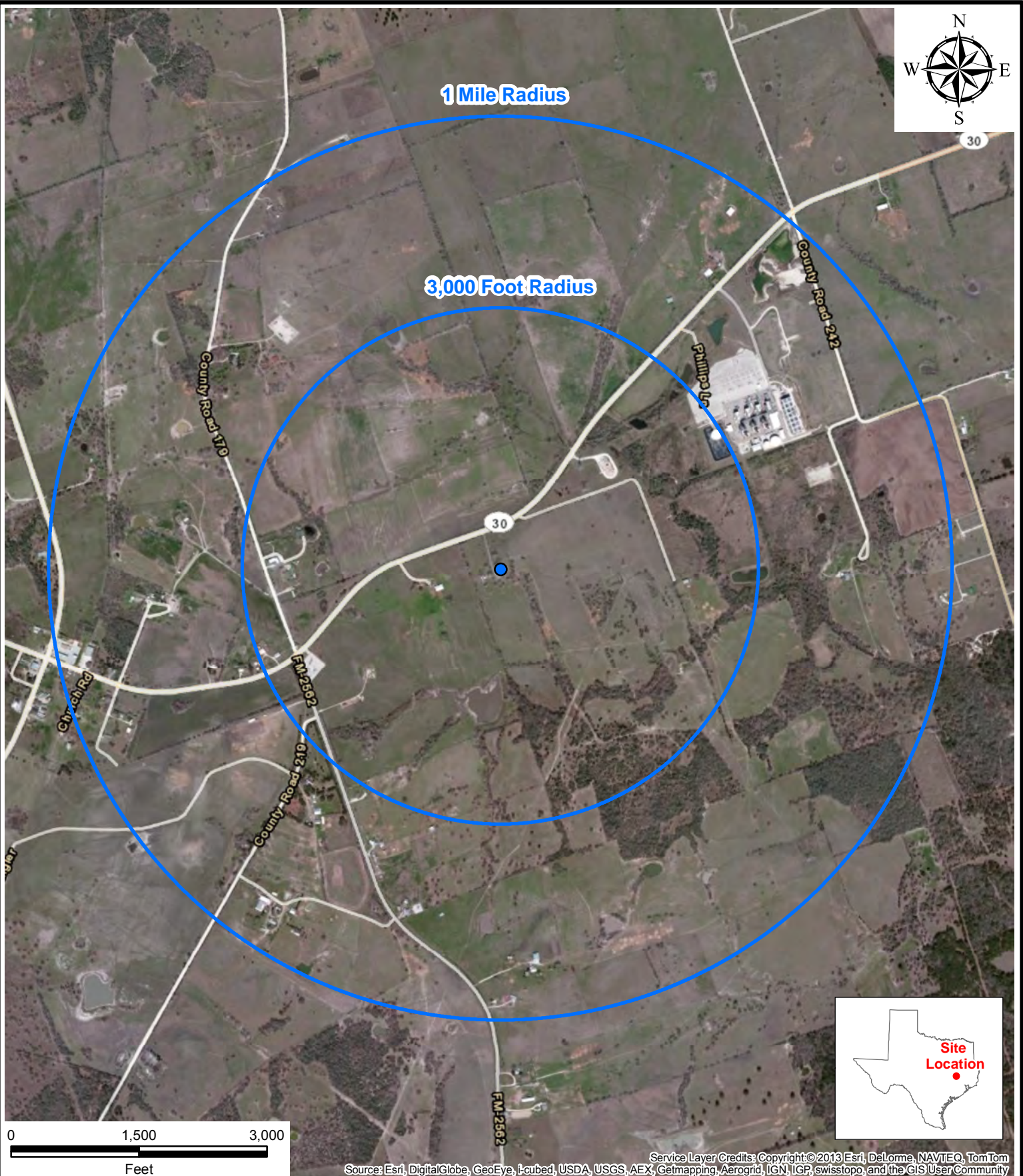
Two diesel fired emergency engines will be installed. One of these engines (2,937 hp) will be used to provide emergency electric power for control systems, and the other (575 hp) will be used to power a firewater pump.

Process Flow Diagram for the facility is presented in Figure 2-3.



1 Mile Radius

3,000 Foot Radius



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 Source: Esri, DigitalGlobe, GeoEye, i-cubed, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community

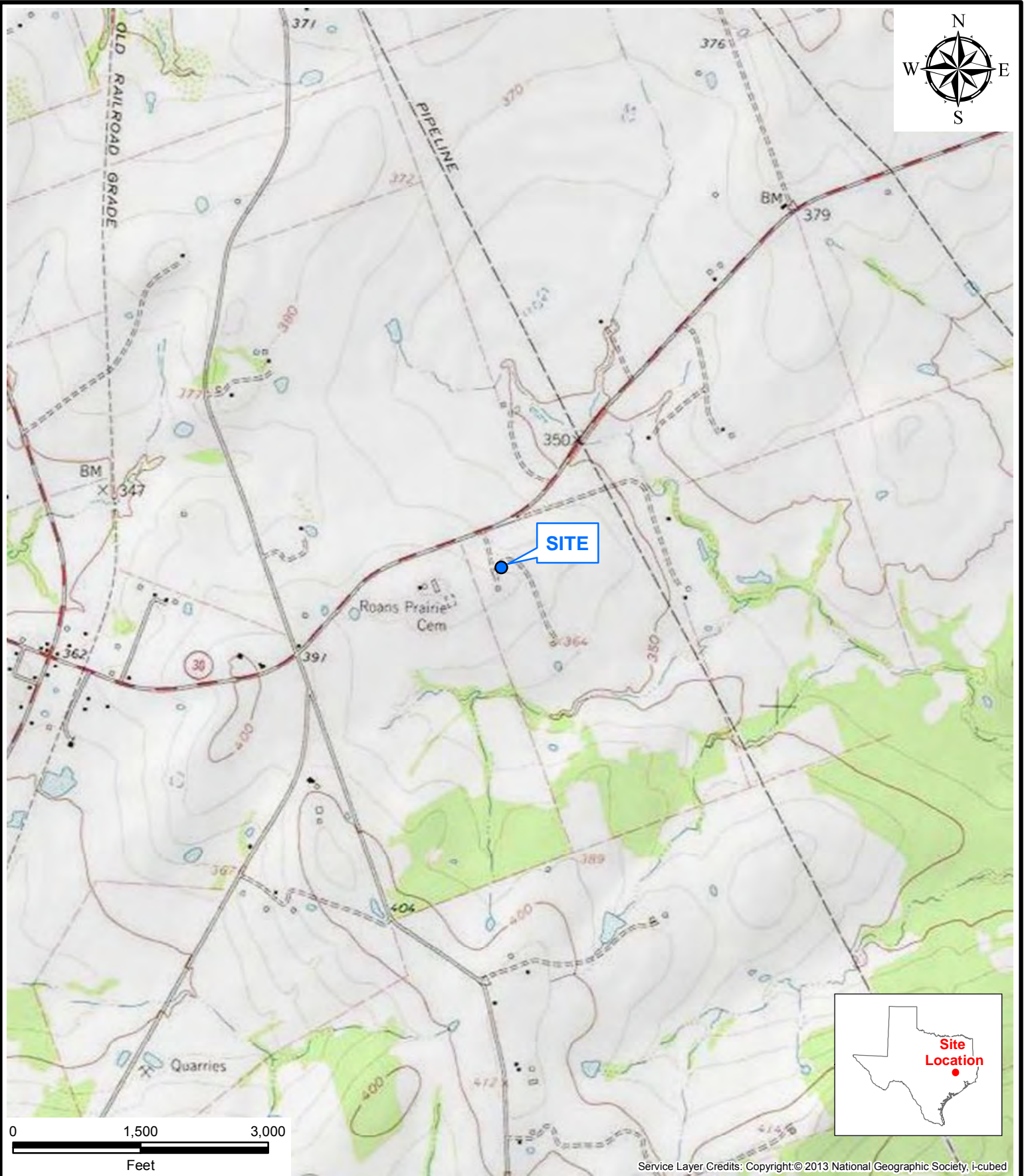


Environmental Resources Management

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FIGURE 08
 3000 FOOT AND 1 MILE RADII MAP
 Tenaska Roan's Prairie Generating Station
 Tenaska Roan's Prairie Partners, LLC
 Roan's Prairie, Grimes County, Texas





Environmental Resources Management

FIGURE 2-2
SITE LOCATION
Tenaska Roan's Prairie Generating Station
Tenaska Roan's Prairie Partners, LLC
Roans Prairie, Grimes County, Texas



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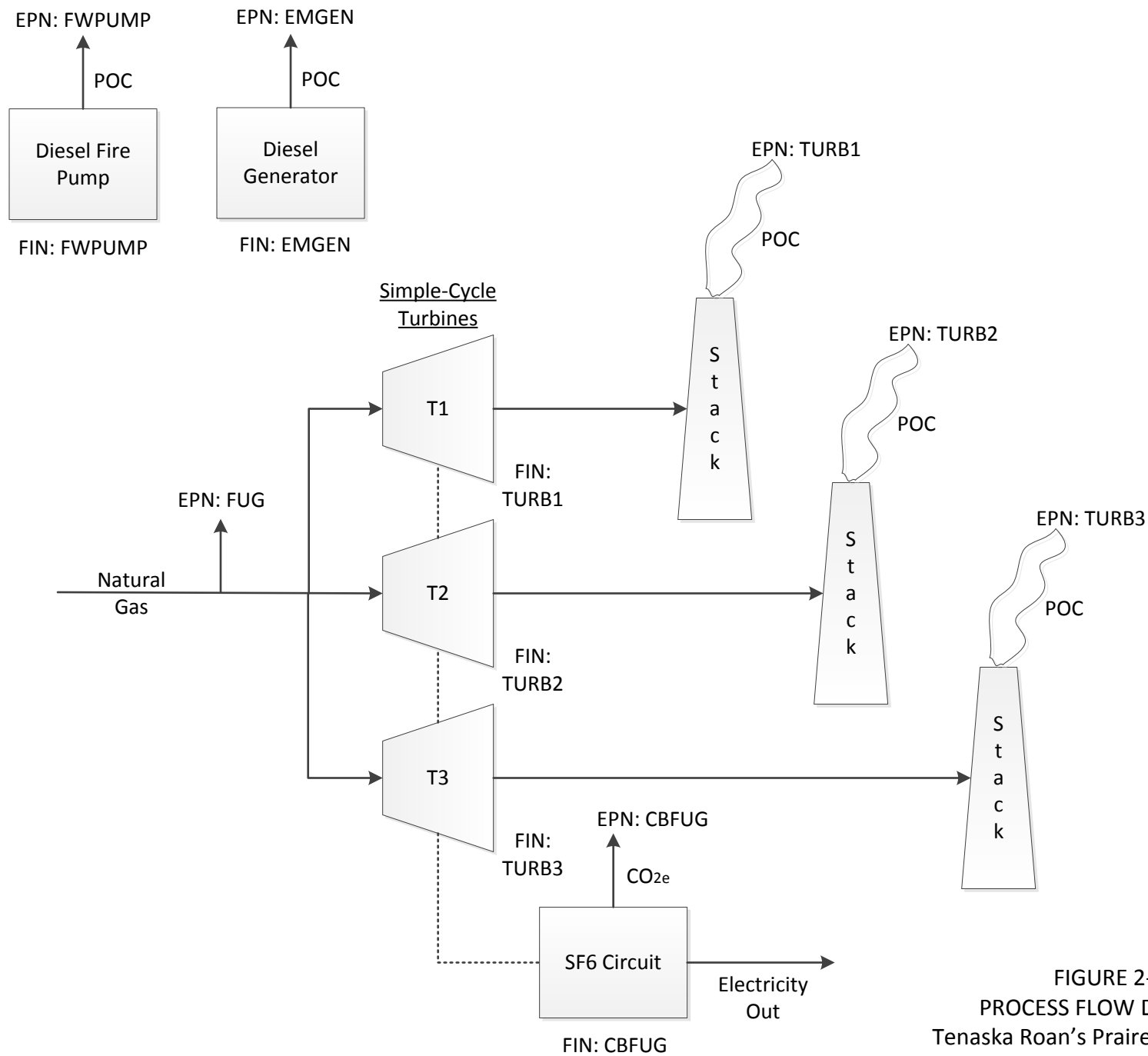


FIGURE 2-3
PROCESS FLOW DIAGRAM
Tenaska Roan's Praire Partners, LLC
Grimes County, Texas

3.0 *REGULATORY REVIEW*

The proposed project will be subject to federal and state environmental laws and regulatory requirements as outlined in the following sections. Only those regulations that are potentially applicable to the proposed project were reviewed in this application.

On May 3, 2011, the USEPA promulgated a Federal Implementation Plan (FIP) for Texas in which USEPA assumed the role of PSD permitting authority for large GHG-emitting sources in Texas in accordance with the thresholds established under the Tailoring Rule, which USEPA published on June 3, 2010. All other pollutants are regulated by the TCEQ under the SIP and are beyond the scope of this application.

3.1 *FEDERAL REGULATIONS*

3.1.1 *Federal Major New Source Review*

The GHG PSD Tailoring rule defines a new major source of GHG emissions as emitting 100,000 tpy of CO_{2e} and 100 tpy/250 tpy (depending on the source category) on a mass basis. A major modification under the rule is defined as an emission increase and net emissions increase of 75,000 tons or more of GHGs on a CO_{2e} basis and greater than zero tpy of GHGs on a mass basis. [40 CFR 52.21(b)(49)(iv)]

Table 3-1 shows the estimated project potential to emit (PTE) for each PSD-regulated GHG. The project PTE of each pollutant was compared to its PSD significance threshold to evaluate the applicability of PSD for each pollutant. The project is a new major source with emissions greater than 100,000 tpy CO_{2e} and 100 tpy of GHGs on a mass basis.

3.1.2 *Compliance Assurance Monitoring (CAM) 40 CFR 64*

The provisions of 40 CFR Part 64 (Compliance Assurance Monitoring [CAM]) apply to each Pollutant-Specific Emissions Unit (PSEU) when it is located at a facility that is required to obtain Part 70 or 71 permit, and the PSEU meets all of the following criteria:

1. The unit is subject to an emission limitation or standard;
2. The unit uses an active control device to achieve compliance with an emission limitation or standard; and
3. The unit has potential pre-control device emissions in the amount of tons per year required to classify that unit as a major source under Part 70 or 71.

The proposed turbines and engines will not use active control devices to control GHG emissions. Therefore, CAM requirements will not apply to these pollutant emissions.

3.1.3 Mandatory GHG Reporting Rule

Under the Mandatory Reporting Rule (40 CFR Part 98), beginning in 2010 facilities with fuel burning equipment with actual CO₂e emissions greater than or equal to 25,000 metric tons per year must submit an annual report for all source categories for which calculation methodologies are provided in subparts C of the rule. The PTE of GHG exceeds the reporting threshold. Therefore, TRPP will report GHG emissions under 40 CFR Part 98.

3.1.4 Proposed NSPS Subpart TTTT

The RPGS will not be subject to the proposed Standards of Performance for Greenhouse Gas Emissions from New Stationary Sources: Electric Utility Generating Units (40 CFR 60 Subpart TTTT, or the alternate revisions to existing Subpart KKKK) as currently written (79 FR 1430). Paragraph 40 CFR 60.5509(a)(2) states the proposed rule would be applicable to stationary combustion turbines that, among other requirements, are “constructed for the purpose of supplying, and supplies, one-third or more of its potential electric output...to a utility distribution system on a 3-yr rolling average basis.” (underline added for emphasis). The RPGS would be operated as a peaking plant, and Tenaska has requested an enforceable limit on the annual capacity factor of each turbine of 33% (approximately equal to 2,920 hours per year at full load), which would make it exempt from the requirements of proposed NSPS Subpart TTTT (or the alternate revisions to existing Subpart KKKK).

TABLE 3-1: PSD Applicability Summary Table

| Pollutant | Project Emissions Increases Siemens Turbines (tpy) | Project Emissions Increases GE 7FA.05 Turbines (tpy) | Project Emissions Increases GE 7FA.04 Turbines (tpy) | PSD Significance Threshold (tpy) | PSD Triggered? (Yes/No) |
|-------------------------|--|--|--|----------------------------------|-------------------------|
| GHG (CO ₂ e) | 1,279,629 | 1,246,175 | 1,152,288 | 100,000 | Yes |
| CO ₂ | 1,278,052 | 1,244,632 | 1,150,839 | 100 | Yes |
| CH ₄ | 26.99 | 26.37 | 24.64 | 100 | Yes |
| N ₂ O | 2.36 | 2.30 | 2.12 | 100 | Yes |
| SF ₆ | 0.01 | 0.01 | 0.01 | 100 | Yes |

BEST AVAILABLE CONTROL TECHNOLOGY (BACT) ANALYSIS

Under 40 CFR 52.21, BACT shall be applied to reduce or eliminate air emissions from a new or modified facility. PSD BACT is applicable to all pollutants that are subject to PSD review as summarized in Table 3-1. BACT is defined in 40 CFR §52.21(b)(12) as:

“An emissions limitation (including a visible emission standard) based on the maximum degree of reduction for each pollutant subject to regulation under Act which would be emitted from any proposed major stationary source or major modification which the Administrator, on a case-by-case basis, taking into account energy, environmental, and economic impacts and other costs, determines is achievable for such source or modification through application of production processes or available methods, systems, and techniques, including fuel cleaning or treatment or innovative fuel combustion techniques for control of such pollutant. In no event shall application of best available control technology result in emissions of any pollutant which would exceed the emissions allowed by any applicable standard under 40 CFR parts 60 and 61. If the Administrator determines that technological or economic limitations on the application of measurement methodology to a particular emissions unit would make the imposition of an emissions standard infeasible, a design, equipment, work practice, operational standard, or combination thereof, may be prescribed instead to satisfy the requirement for the application of best available control technology. Such standard shall, to the degree possible, set forth the emissions reduction achievable by implementation of such design, equipment, work practice or operation, and shall provide for compliance by means which achieve equivalent results.”

The USEPA guidance document, *PSD and Title V Permitting Guidance for Greenhouse Gases (EPA 457/B-11-001)*, USEPA recommends the use of the five-step “top down” BACT process established in the 1990 draft guidance *New Source Review Workshop Manual* to evaluate and select BACT for GHG. This process requires identification and consideration of all available control technologies. The applicant must then demonstrate control technologies that are infeasible due to engineering constraints. All remaining technologies are ranked in order of descending order of control effectiveness. The top-ranked control option must be selected unless the applicant can demonstrate that it is not viable due to adverse economic or environmental impacts. If the most effective technology is not selected, then the next most effective alternative should be evaluated until an option is selected as BACT. The BACT process is summarized as follows:

- Step 1 – Identify all available control technologies;
- Step 2 – Eliminate technically infeasible options;
- Step 3 – Rank remaining control technologies;
- Step 4 – Evaluate and document remaining control technologies; and
- Step 5 – Select BACT.

Each of the steps listed above have been evaluated in detail for each project-related emissions source combination in the following sections.

4.1 SUMMARY OF PROPOSED BACT

A summary of BACT limits and technologies proposed in this permit application are summarized in Tables 4-1 to Table 4-4.

TABLE 4-1: Summary of Proposed BACT for Combustion Turbines

| Pollutant | Limit (Siemens) | Limit (GE 7FA.05) | Limit (GE 7FA.04) | Control Technology/Standard | Averaging Time / Compliance Method |
|--|-----------------|-------------------|-------------------|---|--|
| CO ₂ (lb CO ₂ /MWh _{gross}) | 1,375 | 1,356 | 1,355 | Good combustion practices, operations and maintenance Fuel Selection | 720 hour ¹ rolling average/Fuel monitoring, Recordkeeping |
| CO ₂ e (tpy) | 1,279,154 | 1,245,701 | 1,151,814 | | 12 month rolling average/Fuel Monitoring, Recordkeeping |

¹ The basis for the 720-hour averaging time is the Pio Pico Energy Facility, PSD permit no. SD 11-01 issued by USEPA Region 9

TABLE 4-2: Summary of Proposed BACT for Natural Gas Fugitives

| Pollutant | Limit | Control Technology/Standard | Averaging Time / Compliance Method |
|-------------------|-----------------------------------|-------------------------------------|--|
| CO ₂ e | 83 tpy (12 month rolling average) | AVO ¹ , maintenance plan | 12 month rolling average/ Maintenance and AVO plan documentation |

¹ AVO (audio/visual/olfactory)

TABLE 4-3: Summary of Proposed BACT for Emergency Engines

| Pollutant | Limit | Control Technology/Standard | Averaging Time / Compliance Method |
|-----------------|--------------------|--|--|
| CO ₂ | 163 lb/MMBtu (HHV) | Good combustion practices, operation and maintenance | 12 month rolling average / fuel monitoring |

TABLE 4-4: Summary of Proposed BACT for Emergency Engines

| Pollutant | Limit | Control Technology/Standard | Averaging Time / Compliance Method |
|-------------------|------------------------------------|---|--|
| CO ₂ e | 200 tpy (12 month rolling average) | AVO, maintenance program, state-of-the-art circuit breakers | 12 month rolling average / Maintenance and AVO program documentation |

4.2 BACT FOR COMBUSTION TURBINES

4.2.1 Step 1: Identify All Available Control Technologies

TRPP performed a search of the USEPA RACT/BACT/LAER Clearinghouse (RBLC) for natural-gas fired turbines and recently issued PSD permits for GHG emissions from gas turbines. A summary of previous BACT determinations are provided in Table C-1 in Appendix C. While all gas fired turbines were considered and included in this search for completeness, only comparable simple cycle peaking power production facilities were considered in the final BACT analysis.

TRPP reviewed the GHG BACT analysis of the Pio Pico Energy Center which includes three 100 MW GE LMS100, aero-derivative, simple cycle turbines. Therein, USEPA Region 9 reviewed the thermal efficiency of several power frames with thermal efficiencies ranging from 9,254 to 9,790 Btu_{HHV}/kW-hr_{gross}, and established a BACT limit of 1,328 lb CO₂/MW-hr on a 720 rolling hour basis. This efficiency limit was based on the thermal efficiency of the turbines at 50% load, including a 7.4% factor to account for non-standard conditions, site variability, and equipment degradation over time. Similarly, the York Generating Station was recently issued a permit by the Pennsylvania Department of Environmental Protection (PaDEP) for two aero-derivative LM6000 units rated at a combined heat input of 634 MMBtu/hr. PaDEP established a 1,330 lb CO₂/MW-hr limit commensurate with the Region 9 permit for Pio Pico.

TRPP also reviewed the GHG BACT analysis of the Montana Power Station which includes four 100 MW GE LMS100, aero-derivative, simple cycle turbines. The proposed BACT limits for the facility are an efficiency limit of 1,194 lb CO₂/MW-hr on a 365 day rolling average, and an annual limit on CO₂e emissions. This proposed limit was based on the thermal efficiency at 50% load, but appears to be artificially low, as it does not take into account performance degradation, site variability, or variability in fuel carbon density. As such, TRPP does not consider the proposed limit on the Montana station a viable comparison, until those factors listed above are taken into account.

The Pio Pico and EPE Montana projects are much smaller, at 300 MW and 400 MW, respectively, than the proposed TRPGS at 660 MW (all nominal values). Each of these projects identified specific needs for relatively small

incremental capacity to respond to very localized needs, including up to four daily starts per turbine. Thus, smaller turbines may be more appropriate for those projects. In contrast, the RPGS is being designed to provide larger amounts of peaking power with longer run times without specific service territory or contract restraints. Based upon this design model, Section 4.2.4.2 demonstrates the proposed turbines have the lowest cost of avoided CO₂ emissions.

4.2.1.1 *Inherently Low Emitting Design*

High Efficiency Generators

There are five general categories of inherently low emitting design sources for the generation of electricity.

- Combined Cycle Frame Gas Turbines

Conventional combined cycle frame turbines combine a simple cycle turbine with a heat recovery steam generator (HRSG) and steam turbine to generate electricity. These turbines are designed primarily to provide base load power and require start times ranging from one to six hours. They are not designed to be cycled up and down repeatedly as is required for a peaking unit. Operating in this manner would cause significant maintenance and operational issues. Due to these design limitations, they do not meet the business purpose of peaking power.

- Combined Cycle Fast Start Options

Fast start combined cycle turbines are similar to conventional combined cycle in that they combine a simple cycle turbine with a HRSG and steam turbine to generate electricity. There are two broad types of fast start combined cycle: 1) fast start type 1 (as exemplified by the Siemens Flex Plant 30 and GE FlexEfficiency 60), that require approximately 30 minutes to achieve full load and retain full-load operating efficiency similar to a conventional combined cycle and 2) fast start type 2 (as exemplified by the Siemens FlexPlant 10 that require 10-15 minutes to achieve full load, but has reduced efficiency compared to a conventional combined cycle built around the same gas turbine.

- Reciprocating Engines

Reciprocating engines are often used to generate small amounts of electricity, for isolated sources or to provide back-up power in case of an emergency. Though they are not typically used for peaking power production, there are some commercial models capable of generating approximately 18MW of gross power, as exemplified by the Wartsila 50SG.

- Simple Cycle Aero-derivative Gas Turbines

Aero-derivative simple cycle turbines are simple cycle turbines derived from jet engine design, exemplified by the GE LMS100 series turbines. They are typically lighter weight, slightly more efficient, and are more expensive per

unit of power produced than traditional frame turbines. They are modularly designed, use anti-friction rather than hydraulic bearings, and require a higher inlet pressure of fuel and air, compared to frame turbines.

- Simple Cycle Frame Gas Turbines

Frame simple cycle turbines are the traditional design for simple cycle power generation. They have a quick start time of 10-15 minutes even from a cold start, and they have a strong track record as a reliable source of peak power.

4.2.1.2

Good Combustion, Operating and Maintenance Practices

Good combustion, operating and maintenance practices improve fuel efficiency of the combustion turbines by ensuring optimal combustion efficiencies are achieved as intended in the design of the burner. Good operating practices include the use of operating procedures including startup, shutdown and malfunction procedures, the use of instrumentation and controls for operational control, and maintaining manufacturer recommended combustion parameters. Maintenance practices include performing manufacturer recommended preventative maintenance.

The turbine and plant supervisory and control systems will continuously monitor multiple parameters, including fuel flow, air inlet guide vane position, temperatures and pressures, and other parameters, to assure proper and safe operation of the turbine, while maintaining low emissions. This system will include manual overrides and alarms to alert site personnel to abnormalities. All data will be logged with a data historian in the plant control system. Inspection and maintenance records will be maintained on-site. Recordkeeping and reporting will be per the air permit requirements.

A continuous emissions monitoring system (CEMS) will be utilized to monitor NO_x and CO emissions, as well as in-stack exhaust oxygen content. Fuel sulfur content will be analyzed periodically to estimate SO₂ and particulate matter emissions. VOC emissions will be monitored based upon initial stack test results and comparison with monitored CO emissions.

Dry Low-NO_x (DLN) combustors are prone to flame instability under certain operating conditions. Resulting pressure pulsations (also known as combustion dynamics), when excessive, can damage the combustors and downstream components. Therefore, the combustion turbine will be equipped with an active combustion dynamic monitoring system to continuously monitor combustor pressure levels. The pressure monitoring system will analyze the current combustion dynamic conditions and adjusts the engine's performance accordingly to protect the combustor and reduce combustion instability.

Control valves will be used to regulate and distribute the fuel flow to each combustion turbine's multi-nozzle combustion system. The fuel flow control valves control the desired fuel flow in response to a control system fuel command. The response of the fuel flow to the control valves' commands is made predictable by maintaining a predetermined pressure upstream of the respective control valves. The upstream pressure is controlled by modulating these valves based on turbine speed and feedback from the pressure transducers.

The combustion system includes multiple combustion chambers arranged around the periphery of the compressor discharge casing. This system includes fuel nozzles, ignition system, flame detectors, and other equipment. Hot gases, generated from burning fuel in the combustion chambers, flow through transition pieces to the turbine section.

Turbine air inlet guide vanes are adjusted as required by the turbine control system to regulate the amount of air flow through the compressor section while controlling flame temperatures and minimizing emissions. High pressure air from the compressor discharge is directed around the transition pieces. Some of this air is used to cool the transition pieces. The remaining air enters the combustion zone. Fuel is supplied to each combustion chamber through multiple nozzles designed to disperse and mix the fuel with the proper amount of combustion air.

Maintenance activities, including 'Combustion', 'Hot Gas Path', and 'Major' inspections, will be performed in accordance with the combustion turbine manufacturers' recommendations at intervals which are a function of unit operating hours and starts, borescope inspection findings, and previous maintenance inspection results. Borescope inspections will be performed periodically to visually inspect the physical condition of certain turbine components.

4.2.1.3

Fuel Selection

The use of fuels with low carbon intensity and high heat intensity is appropriate BACT for GHG. The use of natural gas fuels meets these criteria as demonstrated in Table 4-5 summarizing emission factors for various turbine fuels.

TABLE 4-5: Emissions of CO₂ from Gaseous and Liquid Fuels Available For Use in Combustion Turbines

| Fuel Option | Emission Factor (kg CO ₂ /MMBtu) | Carbon Intensity (relative to natural gas) |
|------------------------------|---|--|
| Natural Gas | 53.02 | -- |
| Propane Gas | 61.46 | 1.16 |
| Distillate No. 2 | 73.96 | 1.39 |
| Biomass Liquids ¹ | 68.44 – 81.55 | 1.29 – 1.54 |

¹ Includes biodiesel and various bioethanols.

4.2.1.4 *Carbon Capture and Sequestration*

In addition to reduction of GHG emissions by reducing fuel consumption through efficient design and optimal operation, control technologies to capture and sequester GHG emissions must be considered. Carbon Capture and Sequestration (CCS) has three main approaches including oxy-fuel combustion, pre-combustion capture, and post-combustion capture.

Oxy-fired technology involves the replacement of combustion air with pure oxygen to create a more concentrated CO₂ flow in the combustion exhaust. This technology is in the early stages of review and has not reached a commercial stage of deployment for coal fired boiler or gas turbine applications. As such, it will not be further considered. Pre-combustion capture is primarily applicable to gasification plants and is, therefore, not applicable to this project.

Of these approaches, post-combustion capture is applicable to gas turbines. Post-combustion capture involves separating CO₂ from the exhaust gas stream. Methods of post-combustion capture include adsorption, physical and chemical absorption, cryogenic separation, and membrane separation. If CO₂ capture can be reliably and economically achieved, transportation and reliable long-term storage are still required. This requires proximate access to a transport pipeline capable of delivering the enriched flue gases to a geologic formation suitable for long-term sequestration of CO₂.

4.2.2 *Step 2: Eliminate Technically Infeasible Options*

Of the technologies that meet the business purpose of providing peaking power when needed; only CCS is technologically infeasible. As described below in section 4.2.2.2, it is TRPP's opinion that carbon capture is not feasible for an intermittent source, such as a peak power generating facility. While TRPP believe carbon capture and sequestration to be infeasible, this report will later show that the economic and environmental costs of carbon capture and sequestration are also too high.

4.2.2.1 *Inherently low-emitting design*

The remaining technologies listed below, are technologically feasible:

- Inherently low emitting design
 - Fast Start Combined Cycle
 - Reciprocating Engines
 - Aero-derivative simple cycle turbines
 - Frame simple cycle turbines
- Fuel selection
- Good combustion and maintenance practices

4.2.2.2 *Carbon Capture and Sequestration*

There are three main types of CO₂ capture systems being developed for fossil power plants – (1) pre-combustion capture, (2) oxy-combustion, and (3) post-combustion capture. Among these, the only potentially applicable type for a simple cycle natural gas peaking plant would be the post combustion type. Due to the low concentration of CO₂ and low pressure of combustion flue gases, the leading technology for post combustion systems is chemical solvent absorption/desorption which work by contacting upward flowing flue gases with downward flowing liquid solvent in vertical tower. However, due to the lower pressure of the gas, the size of the equipment for these systems is extremely large. Please see Table 4-6 for a summary of exhaust conditions. As such, the circulating solvent flow rates and volume over which the solvent contacts the flue gas are immense. As a result, these systems have high operational inertia making them slow to start-up and reach steady-state operations (on the order of multiple hours). This timetable is inconsistent with the expected operating mode for the simple cycle peaker configuration which intermittently consists and fast starts and relatively short operating periods.

TABLE 4-6: Flue Gas Characteristics

| Turbine Model | Exhaust Pressure ¹ (psia) | CO ₂ Quantity ² (lb/hr) | CO ₂ Concentration Range ³ (% volume) |
|-----------------------|--------------------------------------|---|---|
| Siemens SGT6-5000F5ee | 14.7 | 291,749 | 3.5 - 4.1 |
| GE 7FA.04 | 14.7 | 262,706 | 3.7 - 4.0 |
| GE 7FA.05 | 14.7 | 284,119 | 3.5 - 4.0 |

Notes:

1. Estimate is static basis and based on atmospheric pressure of 14.511 psia (standard pressure based on the site specific elevation of 350 feet above sea level) and unit operating parameters for base load operation at 90°F DBT, 65% RH with evaporative cooler in operation; assumes losses for exhaust duct and stack.
2. Maximum rates per Table 1(a) of Appendix B of the application on a per-unit basis.
3. Expected range based on manufacturer's data for site specific conditions from minimum load to base load for ambient temperatures ranging from 7°F to 109°F dry bulb, with and without evaporative cooler in operation.

Absorption

Chemical absorption is characterized by the occurrence of a chemical reaction between the pollutant in gas phase and a chemical in liquid phase to form a compound. The most prevalent chemical for CO₂ removal from flue gas are amine solutions. Gas scrubbing systems employing amine are used for a wide variety of gas or liquid hydrocarbon treatment applications. Close contact between the gas and liquid amine solution is required to promote the mass transfer between the two phases. CO₂ has a high solubility in the amine scrubbing solution. Several amine solvents commercially used include monoethanolamine (MEA), diethanolamine (DEA), triethanolamine (TEA), diisopropanolamine (DIPA), diglycolamine (DGA), methyldiethanolamine (MDEA), n-methylethanolamine (NMEA), alkanolamine, and various propriety mixtures of these amines. Other chemical absorbents including ammonia, potassium carbonate, and lime are also in experimental phases for the treatment of flue gases.

Amine absorption has been tested in gas turbine applications and offers high capture efficiency and high selectivity. However, despite these benefits, amine absorption requires additional heat recovery which is unobtainable without a HRSG which is beyond the scope of this project. Northeast Energy Associates conducted CO₂ capture to produce 320 to 350 tons per day CO₂ using a Fluor Econamine scrubber on 15 percent of the flue gas from its 320 MW natural gas combined cycle facility in Bellingham, Massachusetts, from 1991 to 2005. The CO₂ was not sequestered, but was produced for the commercial (food-grade)

CO₂ market and ultimately made its way into the atmosphere. The process was curtailed in 2005 because the CO₂ market no longer made the operation profitable. It is important to note this carbon capture “experience” was on an intermediate load combined cycle facility as compared to the proposed peaking simple cycle configuration. We are not aware of any carbon capture experience on simple cycle gas turbines with such low capacity factors, rendering it technically infeasible. However, a cost estimate for an amine absorption capture system is presented at the end of this absorption section.

Physical sorbents include propylene carbonate, Selexol™, Rectisol™, and Morphysorb™. Close contact between the scrubbing solvent and gas forces the CO₂ into solution. The process has been commercially used to remove CO₂ from natural gas production. Although the energy required regenerating the physical sorbents is much less than that required for chemical sorbents, they are less effective in dilute and low pressure gas streams such as combustion turbine exhaust and would not be able to provide adequate reduction of CO₂. As such, this technology is considered technically infeasible.

Adsorption

Laboratory evaluations of natural zeolite, manufactured zeolite sieves, and activated carbon have all shown that these materials preferentially adsorb CO₂ over nitrogen, oxygen, and water vapor at elevated pressures. Although these materials show promise for CO₂ capture from high pressure gas streams, they are unsuited for low pressure combustion exhaust streams. Therefore, adsorption is considered technically infeasible.

Separation

Polymer-based membrane separation of CO₂ is currently under investigation. Currently, potential membrane materials are prone to chemical and thermal degradation. Like physical sorbents, they are less effective in dilute and low pressure gas streams such as combustion turbine exhaust. This technology is still experimental and not commercially available. Membrane technology is considered technically infeasible for this project.

In cryogenic separation of CO₂, the gas is cooled and compressed to condense CO₂. This process is only effective on dry gas streams with high CO₂ concentrations and is not technically feasible for the dilute gas streams from combustion exhaust.

Transportation and Sequestration

Provided CO₂ capture and compression could be reliably achieved, the high-volume stream must be transported by pipeline to long-term storage to a geologic formation capable of long-term storage. The U.S. Department of Energy National Energy Technology Laboratory (DOE-NETL) states:

“The majority of geologic formations considered for CO₂ storage, deep saline or depleted oil and gas reservoirs, are layers of porous rock underground that are “capped” by a layer or multiple layers of non-porous rock above them. Under high pressure, CO₂ turns to

liquid and can move through a formation as a fluid. Once injected, the liquid CO₂ tends to be buoyant and will flow upward until it encounters a barrier of non-porous rock, which can trap the CO₂ and prevent further upward migration. Coal seams are another formation considered a viable option for geologic storage, and their storage process is slightly different. When CO₂ is injected into the formation, it is adsorbed onto the coal surfaces, and methane gas is released and produced in adjacent wells.

There are other mechanisms for CO₂ trapping as well: CO₂ molecules can dissolve in brine; react with minerals to form solid carbonates; or adsorb in the pores of the porous rock. The degree to which a specific underground formation is amenable to CO₂ storage can be difficult to discern.”¹

The Gulf Coast Carbon Center (GCCC) has identified numerous potential sites along the Texas Gulf Coast that may be suitable for sequestration, the capacity and reliability of these sites remains untested.² In particular, a modeling study of the Frio Formation in the Texas Gulf Coast conducted by the GCCC indicated long-term CO₂ loss from the geologic formation despite high intrinsic capacity and determined further study is required to determine the long-term capacity of geologic formations.³

4.2.3

Step 3: Rank Remaining Control Technologies

These remaining technologically and economically feasible options have been ranked based on their control of GHG from combustion turbines. Table 4-7 provides a summary of the remaining technologies.

¹ DOE-NETL. *Carbon Sequestration: Storage*.

http://www.netl.doe.gov/technologies/carbon_seq/core_rd/storage.html

² Susan Hovorka, et. al. University of Texas, Bureau of Economic Geology – Gulf Coast Carbon Center. *New Developments: Solved and Unsolved Questions Regarding Geologic Sequestration of CO₂ as a Greenhouse Gas Reduction Method*. GCCC Digital Publication #08-13. April 2008.

³ Christine Doughty, et. al. University of Texas, Bureau of Economic Geology – Gulf Coast Carbon Center. *Capacity Investigation of Brine-bearing Sands of the Frio Formation for Geologic Sequestration of CO₂*. GCCC Digital Publication #01-03. 2001.

TABLE 4-7: Ranking of Technically Feasible Emissions Reduction Options of Greenhouse Gases from Combustion Turbines

| Emission Reduction Option | Performance Level (% control) | Rank (x) |
|--|--------------------------------------|-----------------|
| Fuel selection | 15% - 55% | 1 |
| Good combustion, operating and maintenance practices | 5-25% | 2 |
| Inherently low emitting design | 5-20% | 3 |
| Uncontrolled | -- | -- |

4.2.4 Step 4: Evaluate and Document Remaining Control Technologies

4.2.4.1 Carbon Capture and Sequestration

Despite the technical infeasibility of CCS for the proposed project, TRPP evaluated the cost of carbon capture using MEA based on published methodologies. This analysis is shown in Table 4-8. The cost of capture and sequestration using MEA is approximately \$89/ton of CO₂ removed.

This CCS cost analysis assumes that the carbon must be sequestered, and cannot be used in enhanced oil recovery (EOR). Because a peaking unit is only producing CO₂ a fraction of the year, and only for a few hours at a time, there is no market for that kind of CO₂ supply for EOR. The RPGS will be located on the Gulf Coast Oligocene brine formation (of which the Frio formation is a part). As an absolute best case scenario, the cost analysis for sequestration assumes that the Oligocene structure is capable of long term storage, despite contrary evidence from the Frio Project. The analysis further assumes that a suitable sequestration well can be drilled within 10 miles of the facility in the Oligocene structure.

The cost analysis also assumes a typical control level of 90% for the carbon capture system. In practice carbon capture will not be this high because the carbon capture system will not be operational during periods of start-up. Since TRPGS is a peaking facility, the amount of time it spends in start-up is not insignificant. As such, not capturing the CO₂ emissions generated during start-up reduces the effective carbon capture efficiency below the 90% typically claimed for carbon capture processes.

For comparison purposes, one could calculate the threshold value of cost effectiveness for CO₂e based on the relative cost effectiveness of control of a criteria pollutant at some threshold value per ton of pollutant removed and the major source threshold of 100 tpy. This approach is supported by USEPA's rulemaking under the "Tailoring Rule." Through rulemaking the USEPA has "tailored" greenhouse gasses such that 100,000 tons of CO₂e is equal to 100 tons of a criteria pollutant for the purpose of PSD applicability. So, by USEPA's own

rulemaking construct. The cost of carbon capture alone would be equivalent to \$89,000 per ton of criteria air pollutant. Based on this criterion, the CCS demonstration system for the Tenaska Roan’s Prairie Generating Station is found to be infeasible based on cost.

TABLE 4-8: MEA Capture Cost Estimate*

| Item | Value |
|--|--------------------|
| Basis | |
| Total Hours per year | 2,920 |
| Economic Life, years | 20 |
| Interest Rate (%) ^{1,2} | 10 |
| Source(s) Controlled | Three Gas Turbines |
| Nominal Generating Capacity (MW-gross) | 665 |
| Gross Nominal Generation (kWh/yr) | 1,941,800,000 |
| Capital Cost (\$) | 607,056,627 |
| Total Annualized Cost (\$) | 102,432,806 |
| Before Capture Annual Emissions (ton/yr) | 1,278,052 |
| Capture Efficiency | 90% |
| Total CCS Cost (\$/ton CO ₂ , 2012 dollars) | 89 |

* A more detailed cost estimate table can be found in Table B-1 in Appendix B.

In addition to being economically infeasible, there are additional environmental costs associated with additional capture. The MEA system that would be most readily available requires additional energy representing approximately 15% of the load generated by the power plant. Therefore, to generate a comparable amount of net electricity, the facility would be emitting 15% more criteria pollutants such as NO_x, VOC, and particulate as well as hazardous air pollutants such as formaldehyde, which is also a highly reactive VOC (HRVOC) that contributes to ground-level ozone formation. Since this project is located near the Houston ozone non-attainment area, reducing emissions of ozone precursors is more of a concern than reducing greenhouse gas emissions.

Finally, carbon sequestration has other potential environmental impacts that should be considered before declaring sequestration viable as BACT including:

- Impacts from brine displacement into fresh water aquifers or surface water;
- CO₂ leakage into underground or surface drinking water supplies resulting in acidification of water supplies; and
- Subsequent impacts to local flora and fauna.

4.2.4.2 *Inherently Low Emitting Design*

Fast start combined cycle (Siemens FP10 and Siemens FP30), reciprocating engines, aero-derivative simple cycle, and frame simple cycle turbines are still in consideration as inherently low emitting (ILE) design. For the following economic analysis, frame simple cycle turbines are considered as the base case.

Table 4-9 below shows that the cost of avoided CO₂ emissions for these four alternative options at the maximum allowable peaking capacity factor of 33%. The detailed economic calculations for this cost of avoided CO₂ are shown in the confidential Appendix E.

For purposes of Step 4 of the BACT analysis, Table E-1 is intended to provide a comparison of numerous generation technologies on a common, avoided-cost-of-CO₂ basis. In order to compare on a common basis, public domain sources were used for the various data including that for the three turbines being considered for the TRPGS. Therefore, the data for these three turbines differ from the direct permitting-related data tables found elsewhere throughout the application, which are based upon project-specific information obtained directly from Siemens and GE.

TABLE 4-9: Cost of Avoided CO₂ for Generating Technologies at 33% Capacity Factor

| Generating Technology | Cost of avoided CO ₂ (\$/ton) |
|---|--|
| Frame Simple Cycle | N/A ¹ |
| Siemens FP30 & GE FE 60 Fast Start Combined Cycle | 39.9 |
| Siemens FP10 Fast Start Combined Cycle | 215.8 |
| Aero-derivative Simple Cycle | 249.2 |
| Reciprocating Engines | 375.7 |

¹ Frame simple cycle turbines are the baseline for this comparison.

At the maximum annual capacity factor of 33% (approximately 2,920 hours of operation), the costs of avoided CO₂ for the fast start type 1 combined cycle turbines (Siemens FP 30 and GE FE 60) are significantly lower than that for the other fast start combined cycle, aero-derivative simple cycle and reciprocating engines. As such, fast start combined cycle type 2 (FP 10), aero-derivative simple cycle turbines, and reciprocating engines are eliminated due to the higher cost of avoided CO₂ emissions in comparison to the fast start type 1 combined cycle turbine for the stated business purpose.

Since the cost for avoided CO₂ for the fast start type 1 combined cycle turbines is \$39.9/ton (or \$39,900/ton equivalent to criteria pollutants) at the given capacity factor, it is also considered economically infeasible compared to frame simple cycle turbines for the stated business purpose.

4.2.4.3 *Fuel selection, good combustion, operation, and maintenance practices, and fuel preheating*

TRPP has determined that the remaining control technologies have no adverse impacts that require additional consideration or evaluation.

4.2.5

Step 5: Select BACT

TRPP proposes the following design and work practices as BACT for combustion turbines:

- Inherently low emitting design (Frame simple cycle turbine);
- Use of natural gas;
- Good combustion, operation and maintenance practices; and
- Installation of a fuel preheater.

BACT is proposed as three F class frame combustion turbines fueled by natural gas incorporating good combustion, operating, and maintenance practices. The proposed short-term quantitative BACT limits for each of the turbine options being considered are shown in Table 4-10 (applicable at an operational scenario of baseload for 85% of the operating hours and minimum load for the remaining 15%. Minimum load is different for each turbine (40.2% load for the Siemens, 50.3% load for the GE 7FA.04 and 47.9% load for the GE 7FA.05). The ultimate turbine model chosen will be selected based upon several operational and economic factors, including the total plant capacity that best fits expected power supply contract signed by TRPP.

Table 4-10 below shows the calculations demonstrating the mass emission rate of CO₂ for each of the three turbines in lb/MW-hr.

TABLE4-10: CO₂ BACT Emission Rate Determination

| Parameter | Units | Siemens SGT6-5000F | GE 7FA.05 | GE 7FA.04 |
|--|------------------|--------------------|----------------------------------|----------------------------------|
| Full Load at Summer Design Condition ¹ | | | | |
| Load /Site Condition from App D Turbine Performance Data | | "CASE 28" | "BASE" @ 98 °F (Evap Coolers on) | "BASE" @ 98 °F (Evap Coolers on) |
| Output (New and Clean, per Turbine) | (MW) | 221.3 | 204.5 | 168.7 |
| Heat Rate (New and Clean) ² | (Btu/kWh HHV) | 10,160 | 9,972 | 10,144 |
| Assumed Operation % at Full Load | (%) | 85% | 85% | 85% |
| Minimum Load at Summer Design Condition ¹ | | | | |
| Load /Site Condition from App D Turbine Performance Data | | "CASE 27" | "47.9%" @ 98 °F | "59.5%" @ 98 °F |
| Minimum Load Definition | (MW) | 93.0 | 91.5 | 93.2 |
| | (% of Full Load) | 42% | 45% | 55% |
| Heat Rate (New and Clean) ² | (Btu/kWh HHV) | 13,437 | 13,548 | 12,526 |

| Parameter | Units | Siemens SGT6-5000F | GE 7FA.05 | GE 7FA.04 |
|--|----------------|--------------------|-----------|-----------|
| Assumed Operation % at Min Load | (%) | 15% | 15% | 15% |
| Blended Permitting Data (85% Ops @ Full Load and 15% Ops @ Min Load) at Summer Design Condition ¹ | | | | |
| Heat Rate (New and Clean) ² | (Btu/kWh HHV) | 10,651 | 10,509 | 10,502 |
| CO ₂ Fuel Intensity | (lb/MMBtu HHV) | 119.5 | 119.5 | 119.5 |
| CO ₂ Emission Rate (New and Clean) | (lb/MWh) | 1,273 | 1,256 | 1,255 |
| Degradation Margin | (%) | 6% | 6% | 6% |
| Commercial Margin | (%) | 2% | 2% | 2% |
| CO ₂ Fuel Intensity Margin | (%) | 0% | 0% | 0% |
| CO ₂ Emission Rate (Margined/Permitted) | (lb/MWh) | 1,375 | 1,356 | 1,355 |

¹ Summer design condition defined as 98 °F dry bulb ambient, 42% relative humidity

² Conversion from heat rate (HHV) to % efficiency (HHV) is as follows:

$$\frac{3,412.14 \text{ Btu/hr / kW}}{\text{Heat Rate (HHV) Btu/kWh}} = \% \text{ efficiency (HHV)} \times \frac{1.11 \text{ LHV}}{\text{HHV}} = \% \text{ efficiency (LHV)}$$

TRPP proposes an annual emission limit of 1,151,754 to 1,279,088 tpy of CO₂e for the turbines which includes emissions from maintenance, startup, and shutdown activities. The proposed emission limit is based on a 12-month rolling total basis as monitored by fuel use records and fuel heating value and carbon content. Based on these data, annual CO₂ emissions are calculated according to the technique put forth in 40 CFR 75 Appendix G Section 2.1. TRPP proposes a short-term emission rate limit of 1,355 to 1,363 lb CO₂/MWh_{gross} equivalent based on a 720-hour rolling average and which functionally equivalent frame turbine is selected based on the specific power supply contract signed. The proposed BACT limits were adjusted from “new and clean” emission rates due to two general factors: variability in equipment provider commercial guarantees and turbine performance degradation. Each is discussed in more detail below. As with the annual emission limit, compliance is monitored by fuel use records, fuel heating value and carbon content, and gross power generation. Based on these data, short-term CO₂ emissions are calculated according to the technique put forth in 40 CFR 75 Appendix G Section 2.1.

Equipment Provider Commercial Guarantees

For early stage project development, turbine original equipment manufacturers (OEMs) provide preliminary performance estimates – they are unable or unwilling to provide guaranteed values due to the number of technical, commercial, and contractual issues that are undefined. OEMs and engineering, procurement, and construction (EPC) contractors are unwilling to establish the guarantees until the final contract negotiations when all commercial issues

become known such that they can assess and limit the overall risk of a particular project.

However, because TRPP intends to finance the project, these preliminary estimates will need to be converted to guarantees prior to financial closing and commissioning of the project. The prospective lenders will require that guaranteed figures be consistent with both the economic projections and the permitted emissions.

The guaranteed heat rate figures are likely to be higher than the preliminary estimates due to the following issues:

- The preliminary figures do not include test measurement uncertainty. Every measurement is the combination of the true value plus measurement error. Thus, there is inherent uncertainty in the measurement. This uncertainty has two parts: (1) systematic error (also known as bias or fixed error) which is a function of the particular measurement device type/vendor and installation and (2) random or statistical error which results from the scatter of repeated measurements using the same instrumentation. Since the specific CO₂ emissions are the result of several measurements and calculations, the total uncertainty will be the square root of the sum of the squares of the product of the individual measurement uncertainties and their respective sensitivities. In previous projects, total uncertainty was 1.0 to 1.5%. TRPP would expect something similar to be established for Roan's Prairie as it appears to be typical total uncertainty for the types of instrumentation used and which the OEMs are willing to accept. The definitions for test uncertainty and the gas turbine performance test codes can be found in ASME 19.1 and 22, respectively.
- The detailed project scope (the basis for the guarantee) is not fully defined. A number of design elements are not fully decided until detailed engineering. For example: determination of vendor and geometry of inlet filter media, its associated pressure drop, and the resultant effect on performance.
- Each combustion turbine is unique. During commissioning, the OEM observes the combustion dynamics and tunes the unit performance by adjusting the base load firing curve, the base load inlet guide vane angle, and other control parameters. The OEM is expected to include safety margin in its final guarantee values to cover this issue, once all the performance and emission guarantee parameters are defined.
- Guaranteeing CO₂ emissions is a new requirement for the OEMs/EPCs and, as such, adds risk to their commercial offering. In order to manage this risk, they are likely to be conservative by including margin in their guaranteed value.

Given the typical value of uncertainty of 1.0-1.5%, plus the other unquantified issues, TRPP elected to use a 2.0% margin for converting the current preliminary estimates to guarantee-able values.

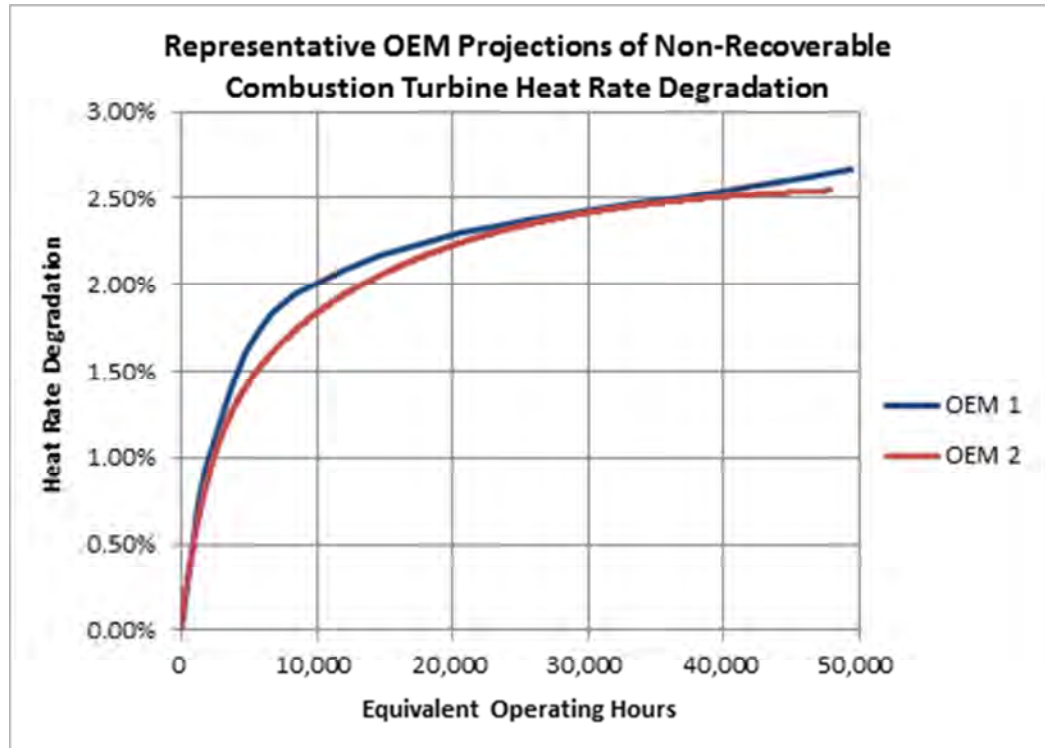
CT Performance Degradation

Even under the best possible operating conditions, the performance of a gas turbine is subjected to deterioration due to compressor fouling and corrosion, inlet filter clogging, thermal fatigue and oxidization of hot-gas path components such as combustion liners and turbine blades. Collectively, these mechanisms reduce the electrical output and efficiency (i.e., increase the heat rate) of combustion turbines. The heat rate increase causes a corresponding increase in the specific CO₂ emission rate.

Performance degradation can be grouped into two types: non-recoverable and recoverable. The contributions from these two types and the time period over which they occur is a function of the plant operating profile – i.e., the capacity factor and the number of starts as dictated by market forces. OEMs define the timing for major maintenance in terms of “equivalent operation hours” (EOH). The formulation of EOH varies among the OEMs, but conceptually consists of actual operating hours plus number of starts times a multiplier. The starts multiplier is generally relatively large because the thermal cycling of the unit during a start has a much larger impact on long term operations than an hour spent at steady-state operations.

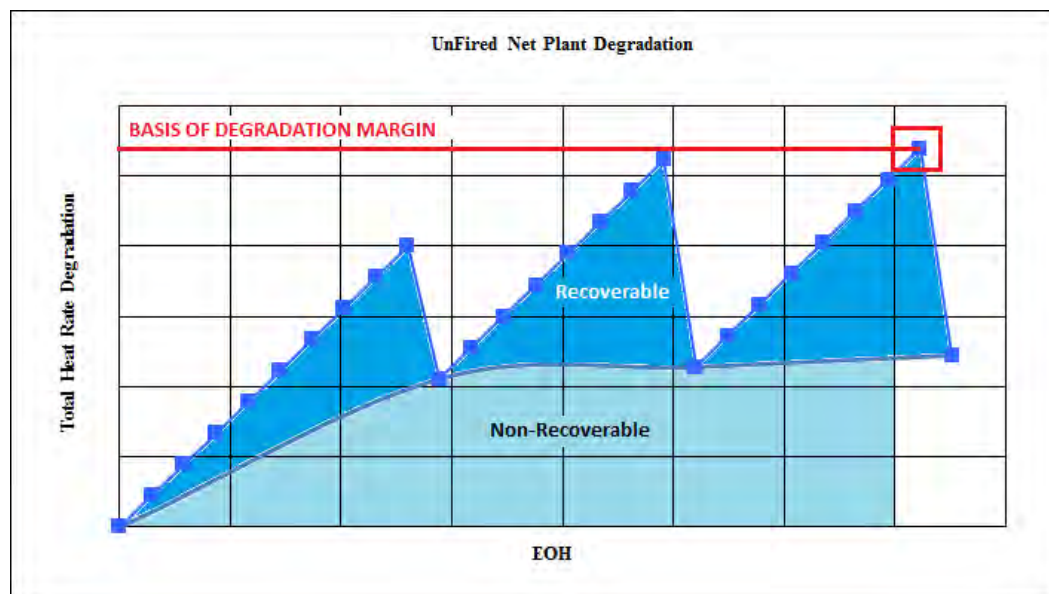
Non-recoverable degradation occurs and continues throughout the operating life of the combustion turbine. OEMs provide a projection of this impact versus EOH. These trends consist of relatively rapid initial heat rate degradation of 0.3 to 0.5% per 1,000 EOH for the first few thousand EOH which then flattens to a long term degradation rate of 0.02 to 0.05% per 1,000 EOH. The long term impact is a 2.5 to 3.0% increase in heat rate at high EOH over new and clean performance. The figure below depicts curves from two major OEMs:

FIGURE 4-1: Non-Recoverable Heat Rate Degradation



Recoverable degradation is that which may be recovered through compressor washes and the performance of major maintenance, and accumulates over time between major maintenance intervals. The rate of change is minimized by performing compressor washes. When an off-line wash and major maintenance are performed, the unit heat rate should return to the new and clean heat rate plus the non-recoverable degradation (described above). As a result, total degradation (non-recoverable plus recoverable) appears as a saw-tooth type curve, as shown in Figure 4-2. However, there is significant uncertainty in whether the performance will be recovered in practice. For example, TRPP has experienced essentially no performance recovery after major maintenance for a few units in its fleet.

FIGURE 4-2: Recoverable Thermal Efficiency Degradation



Based on vendor curves and operating fleet experience (including plant performance tests executed before and after major maintenance), TRPP has determined that recoverable degradation can reach 3 to 4% between maintenance intervals.

As previously mentioned, the individual contributions from these types of degradation are dependent on the run profile. However, TRPP cannot definitively predict the future market conditions for the life of the plant. Thus, TRPP modeled a matrix of plausible run profiles (with various combinations of starts and capacity factors) to compute the degradation profile. Then, TRPP selected the highest heat rate for the worst year from the worst run profile (the highest peak of the saw tooth) curve. This value was nominally 6% above new and clean performance. This result makes sense because the individual contributions of non-recoverable degradation and recoverable degradation can be 2.5 to 3% and 3 to 4%, respectively, for high EOH at the end of a run (nearing a major maintenance event).

Combining both adjustment factors, variability from the vendor guarantee (2%), and performance degradation (6%); TRPP proposes that an 8% factor be applied to the new and clean thermal efficiency provided by the turbine manufacturers, as shown in Table 4-10.

4.3 **NATURAL GAS FUGITIVE EMISSIONS**

4.3.1 **Step 1: Identify All Available Control Technologies**

TRPP performed a search of the USEPA RBLC for fugitive emissions from gas fired turbines for power generation; a summary of these results is shown in Table C-2 in Appendix C. Based on that and a review of the available literature, TRPP has identified the following control options for natural-gas fugitive emissions:

- Good operations and preventative maintenance plan;
- Implementing an AVO program to identify and repair leaks; and
- Use of leakless components.

4.3.2 **Step 2: Eliminate Technically Infeasible Options**

Of the identified control technologies, only leakless components are technologically infeasible. Leakless components are only currently used in industries that use highly hazardous gases and liquids. Given that the environmental impact of GHGs have not yet been fully quantified, and GHGs do not present any acute hazards, consideration of leakless components as BACT is unwarranted.

4.3.3 **Step 3: Rank Remaining Control Technologies**

TABLE 4-11: Ranking of Technically Feasible Emissions Reduction Options of Greenhouse Gases from Natural Gas Fugitives

| Emission Reduction Option | Performance Level (% control) | Rank (x) |
|--|-------------------------------|----------|
| AVO Program | 93-97%% | 1 |
| Good operating and maintenance practices | 5-25% | 2 |
| Uncontrolled | -- | -- |

4.3.4 **Step 4: Evaluate and Document Remaining Control Technologies**

TRPP has determined that the control technologies identified in Table 4-11 have no adverse impacts that require additional consideration or evaluation.

4.3.5 **Step 5: Select BACT**

TRPP proposes the following design and work practices as BACT for fugitive components:

- Implementing an AVO inspection program; and
- Good operation and maintenance practices.

TRPP proposes an emission limit of 83 tpy of CO_{2e} (12-month rolling average) for the facility. Compliance will be demonstrated by proper documentation of the maintenance and AVO programs.

4.4 *DIESEL FIRED EMERGENCY ENGINES*

4.4.1 *Step 1: Identify All Available Control Technologies*

TRPP performed a search of the USEPA RBLC for diesel fired emergency engines and the results are shown in Table C-3 in Appendix C. The BACT identified for these emergency generators were good combustion practices or fuel-efficient design. Based on this information, TRPP has identified the following control options for emergency generators and fire pump engines:

- Good combustion practices, operation and maintenance;
- Alternative fuels; and
- Carbon Capture and Sequestration.

4.4.1.1 *Good Combustion Practices, Operation and Maintenance*

Proper combustion, operation and maintenance ensure the boilers maintain optimal efficiency and perform as designed. These operational practices include:

- Combustion optimization;
- Operation procedures including startup, shutdown, and malfunction;
- Instrumentation and controls;
- Reduce air leakages; and
- Preventative maintenance.

4.4.1.2 *Alternative Fuels*

The use of fuels like natural gas or propane may reduce carbon emissions by changing the carbon to energy density of the fuel. The use of these fuels does not meet the purpose of the emergency engines, namely being able to supply power quickly and reliably in case of an emergency; necessitating a self-contained, stable and independent fuel supply. As such, lower carbon to energy density fuels do not meet the business purpose of the emergency engines, and are not considered for BACT.

4.4.1.3 *Carbon Capture and Sequestration*

Carbon capture and sequestration is discussed in Section 4.2.1.4.

4.4.2 Step 2: Eliminate Technically Infeasible Options

4.4.2.1 Carbon Capture and Sequestration

Carbon capture and sequestration on a highly intermittent process like an emergency generator is not technically feasible. The process equipment used in carbon capture requires significant start-up time, such that it would not be operational in time to capture emissions from the engine which will primarily be used for short periods of time.

4.4.3 Step 3: Rank Remaining Control Technologies

The remaining technologically feasible options have been ranked based on their GHG emissions reductions performance levels. Table 4-12 provides a summary of the remaining technologies.

TABLE 4-12: Ranking of Technically Feasible Emissions Reduction Options of Greenhouse Gases from Emergency Engines

| Emission Reduction Option | Performance Level (% control) | Rank (x) |
|--|-------------------------------|----------|
| Good combustion, operating and maintenance practices | 5-25% | 1 |
| None | -- | -- |

4.4.4 Step 4: Evaluate and Document Remaining Control Technologies

TRPP has determined that good combustion, operating and maintenance practices have no adverse impacts that require additional consideration or evaluation.

4.4.5 Step 5: Select BACT

TRPP proposes the following design and work practices as BACT for the emergency generators:

- Good combustion, operation and maintenance practices.

TRPP proposes a short-term emission limit of 164 pounds of CO_{2e} per MMBtu (12-month rolling average) for each diesel engine including emissions from maintenance, startup, and shutdown activities. This value of 180 was based on the EPA emission factor of 163.6 lb/MMBtu for diesel engines. Compliance will be demonstrated by monitoring fuel usage and fuel higher heating value. CO₂ emissions will be calculated using the EPA emission factor from table 40 CFR 98 C-1.

4.5 *FUGITIVE SF₆ EMISSIONS FROM ELECTRICAL COMPONENTS*

4.5.1 *Step 1: Identify All Available Control Technologies*

TRPP performed a search of the USEPA RBLC for SF₆ containing circuit breakers in addition to reviewing the literature on emissions reductions methods. A summary of the RBLC results is included in Table C-4 in Appendix C. Based on this information, TRPP has identified the following control options for SF₆ containing circuit breakers:

- Use of materials other than SF₆ (air blast or dielectric oil);
- Use of state-of-the-art circuit breakers that are gas-tight and require minimal SF₆;
- Good operations and preventative maintenance plan; and
- Implementing an AVO program to identify and repair leaks.

4.5.2 *Step 2: Eliminate Technically Infeasible Options*

4.5.2.1 *Alternative Circuit Breaker Insulation Material*

No alternative materials exist that are as easily implemented as SF₆; per the EPA’s Report “SF₆ emission Reduction Partnership for Electric Power Systems” (<http://www.epa.gov/electricpower-sf6/>),

“No clear alternative exists for this gas that is used extensively in circuit breakers, gas-insulated substations, and switch gear due to its inertness and dielectric properties.”

4.5.3 *Step 3: Rank Remaining Control Technologies*

The remaining technologically feasible options have been ranked based on their GHG emissions reductions performance levels. Table 4-13 provides a summary of the remaining technologies.

TABLE 4-13: *Ranking of Technically Feasible Emissions Reduction Options of Greenhouse Gases from Fugitive SF₆ Emissions*

| Emission Reduction Option | Performance Level (% control) | Rank (x) |
|---|-------------------------------|----------|
| AVO program | 30% | 1 |
| Good operating and preventative maintenance practices | 10% | 2 |
| None | -- | -- |

4.5.4 *Step 4: Evaluate and Document Remaining Control Technologies*

TRPP has determined that the control technologies identified in Table 4-13 have no adverse impacts that require additional consideration or evaluation.

4.5.5 *Step 5: Select BACT*

TRPP proposes the following design and work practices as BACT for the SF₆ circuit breakers:

- Implementing an AVO program.
- Use of good operations and preventative maintenance practices.

TRPP proposes to conduct the SF₆ AVO inspections on a weekly basis. Components found leaking will be repaired or replaced as soon as practicable but no later than 30 days after leak detection. Preventative maintenance procedures will consist of installing SF₆-containing equipment with a maximum annual leakage rate of 0.5% by weight and use of density monitoring systems that will alarm in the control room if a density loss is detected. Should an alarm occur the cause will be investigated and any leaking component found will be repaired or replaced as soon as practicable but no later than 30 days after leak detection. Records will be kept of the weekly AVO inspection results, any required component repair or replacement, and any density alarms with resulting actions taken.

TRPP proposes an annual emission limit of 200 tpy of CO_{2e} (12-month rolling average) for all SF₆ containing components at the facility. Compliance will be demonstrated by appropriate documentation of the AVO and preventative maintenance plans.

This section summarizes the methodologies and emission factors used to calculate the PTE GHG emissions for each emission source included in this project. As previously mentioned, this project involves the construction of an all new facility to include three new simple cycle gas turbines, one diesel engine powered emergency generator, and one diesel engine powered fire pump. GHG emissions from the new units were calculated for purposes of determining PSD applicability and for determining if the facility would require a Title V operating permit based on its GHG annual emission rate. In addition to the GHG generated from combustion of natural gas, the fugitive emissions resulting from leakage of SF₆ used in electrical distribution equipment and fugitive losses of natural gas are also included.

Plans call for the installation of three identical turbines; However, three different models of turbines are under consideration, and therefore, this discussion includes three different sets of turbine emission rates. Detailed emissions calculations for the overall project are presented in Appendix B. Project summary emissions for the three different turbine scenarios are shown in Tables B-2 through B-4. Emissions calculations for each individual turbine are shown in Tables B-5 through B-7. Emissions calculations for the other units including MSS emissions are shown in Tables B-8 through B-12.

5.1 POTENTIAL EMISSIONS CALCULATIONS

5.1.1 Combustion Turbines

Potential emissions for each of the combustion turbines were calculated based on 2,920 hours of operation. The limit on annual capacity factor is based on the proposed Carbon Pollution Standard for New Power Plants (NSPS Subpart TTTT) for defining the operations of simple cycle turbines used as peaking units. The new turbines will be available to operate at the maximum rated capacities shown in Table 5-1. The emission factors used for calculating potential GHG emissions from the new combustion turbines are summarized in Table 5-2. The global warming potentials from Part 98, table A-2 are used to convert the GHG pollutants into terms of CO₂e, as provided in Table 5-3. The GHG pollutants and the total GHG emissions stated in terms of CO₂e for the three groups of turbines are shown in the Table 5-4.

For emission calculation purposes, 365 starts and shutdowns per year per turbine were assumed. This was derived by assuming one start and shutdown per day with an 8-hr run time per start (2,920 hrs/yr limit divided by assumed 8-hrs per run equals 365 starts/shutdowns per year). The combined duration of a startup and shutdown will not exceed 25 minutes for the Siemens turbine and 40 minutes for both GE turbines. The actual number of starts/shutdowns per day and per year, as well as the actual run time per start, will be dictated by market forces and could be higher or lower than that assumed. However, annual emissions will not exceed the proposed maximum rates.

To determine the CO₂ emission factor for the turbine, TRPP developed a hypothetical gas composition based on the probable supply contract with the natural gas provider. The composition represents a fuel with relatively low methane content and high NGL content, but which still meets the tariff limits of 1,150 Btu/SCF higher heating value and (less than) 0.2 gallon C5+ NGLs per thousand standard cubic feet (GPMs). The resulting CO₂ intensity of this hypothetical fuel is 119.5 lb CO₂/MMBtu (54.2 kg CO₂/MMBtu). Determination of this emission factor is provided in Appendix D.

TABLE 5-1: Turbine Maximum Design Data per Turbine

| Turbine Manufacturer and Model Number | Rated Capacity (MW) ² | “New and Clean” Thermal Efficiency (Btu/kW-hr, HHV) ² | Marginal ¹ Thermal Efficiency (Btu/kW-hr, HHV) ² | Maximum Heat Input (MMBtu/Hr) |
|---------------------------------------|----------------------------------|--|--|-------------------------------|
| Siemens SGT6-5000F(5ee) | 231.2 | 9,778 | 10,561 | 2,441 |
| GE 7FA.05 | 227.6 | 9,672 | 10,446 | 2,378 |
| GE 7FA.04 | 207.0 | 9,833 | 10,620 | 2,198 |

¹ Includes an 8% adjustment above new and clean to account for non-standard conditions, and performance degradation.

² These performance numbers were taken at an Ambient Temperature of 7F and humidity of 53%.

TABLE 5-2: Natural Gas-fired Turbine GHG Emission Factors

| Pollutant | Emission Factor (kg/MMBtu) | Global Warming Potential (100 Yr) | Basis |
|------------------|----------------------------|-----------------------------------|--|
| CO ₂ | 54.22 | 1 | Based on representative fuel sample data described above |
| CH ₄ | 0.001 | 25 | 40 CFR Part 98, Subpart C, Table C-2& Subpart A, Table A-1 |
| N ₂ O | 0.0001 | 298 | 40 CFR Part 98, Subpart C, Table C-2& Subpart A, Table A-1 |

TABLE 5-3: Total GHG (CO₂e) Emissions from the Natural Gas Turbines

| Greenhouse Gas Emissions from Turbines (tpy) | | | |
|--|-------------------------------------|-----------------------|-----------------------|
| Pollutant | Three (3) Siemens - SGT6-5000F(5ee) | Three (3) GE – 7FA.05 | Three (3) GE – 7FA.04 |
| CO ₂ | 1,277,862 | 1,244,443 | 1,150,650 |
| CH ₄ | 23.57 | 22.95 | 21.22 |
| N ₂ O | 2.36 | 2.30 | 2.12 |
| GHG (CO ₂ e) | 1,279,154 | 1,245,700 | 1,151,813 |

5.1.2 Diesel Fired Emergency Engines

The proposed project includes two diesel emergency engines. The first emergency engine with a rating of 2,937 horsepower will drive a generator to supply electrical power in the event of the loss from the local utility. The second

emergency engine with a rating of 575 horsepower will drive the fire water pump. The maximum hourly heat input rate for each engine was estimated based on the maximum hourly fuel consumption rate supplied by the prospective engine manufacturers (Appendix D) and the higher heating value of 0.138 MMBtu per gallon from Table C-1 from Subpart C of 40 CFR Part 98. The GHG emissions were then calculated using the default GHG emission factors from Subpart C of 40 CFR Part 98 shown in Table 5-5 for No. 2 distillate fuel oil.

TABLE 5-4: Emergency Engine GHG Emission Factors

| Pollutant | Emission Factor (kg/MMBtu) | Basis |
|------------------|----------------------------|--------------------------------------|
| CO ₂ | 73.96 | 40 CFR Part 98, Subpart C, Table C-1 |
| CH ₄ | 3.0E-03 | 40 CFR Part 98, Subpart C, Table C-2 |
| N ₂ O | 6.0E-04 | 40 CFR Part 98, Subpart C, Table C-2 |

PTE for the emergency engines is based on 100 hours per year each as prescribed in Mr. John Seitz' memo to EPA regional directors⁴. The total potential GHG emissions from the emergency engines are shown in the Table 5-6.

TABLE 5-5: GHG Emissions from the Emergency Engines

| GHG Pollutant | Potential Emissions (tpy) |
|-------------------------|---------------------------|
| CO ₂ | 189.01 |
| CH ₄ | 0.008 |
| N ₂ O | 0.0015 |
| GHG (CO ₂ e) | 189.66 |

5.1.3 Fugitive SF₆ Emissions from Electrical Equipment

SF₆ is used in high voltage electrical equipment as an insulator and arc quenching medium. Fugitive emissions of SF₆ may result due to equipment leakage. Because SF₆ is a very potent greenhouse gas its emissions have been included in the facility-wide GHG emission estimation.

The fugitive emissions were calculated for each device as the product of the mass of SF₆ contained in each piece of equipment, the likelihood of an equipment leak (0.5 percent per year), and the amount of SF₆ lost due to leakage (defined as 100% of the device capacity). The total estimated SF₆ fugitive loss was found by summing the losses for each device type and number estimated for use at the facility.

⁴ United States Environmental Protection Agency. 1995. Memorandum from Mr. John S. Seitz, Director of the Office Air Quality Planning and Standards. *Potential to Emit for MACT Standards – Guidance on Timing Issues*. May 16, 1995.

The likelihood of fugitive emissions from SF₆ containing equipment such as circuit breakers was estimated based on the annual leakage percentage standard for new equipment established by the International Electrotechnical Commission (IEC) Standard 62271-1 from October 2007 of 0.5 percent. For purposes of estimating emissions, the entire capacity of a leaking device was assumed to be lost.

To convert the mass of SF₆ lost into terms of CO₂e, the global warming potential from Part 98, Subpart A was used and is provided in Table 5-7. The resulting CO₂e emissions from leaking high voltage electrical equipment are shown in Table 5-8.

TABLE 5-6: GHG Emissions and Global Warming Potential of Sulfur Hexafluoride

| Pollutant | SF ₆ Emissions (tpy) | Global Warming Potential (100 Yr) | GHG (CO ₂ e) Emissions (tpy) | Basis |
|-----------------|---------------------------------|-----------------------------------|---|--------------------------------------|
| SF ₆ | 0.00875 | 22,800 | 199.50 | 40 CFR Part 98, Subpart A, Table A-1 |

5.1.4 GHG Emissions from Fugitive Natural Gas Losses due to Leaks and Equipment Maintenance

Additional GHG emissions result from fugitive leaks of natural gas from the equipment piping and from losses that occur during maintenance activities. Fugitive natural gas losses were estimated using *Synthetic Organic Chemical Manufacturing Industry (SOCMI) Fugitive Equipment Leak Factors* from the October 2000 Draft TCEQ Technical Guidance Package, and the type and number of various pieces of equipment and fittings. The losses from the equipment gas piping were estimated based on the volume of gas contained in the piping and the number of times per year the piping will be opened during maintenance. Detailed emission calculations are included in Appendix B. The GHG emissions from fugitive leaks and from maintenance are included in the facility summary shown below as part of Tables 5-7 to 5-9.

5.1.5 Summary of GHG Emissions from Project

The total GHG potential emissions from the project are summarized in Tables, 5-9, 5-10, and 5-11 for each of the three different models of turbines under consideration.

TABLE 5-7: Summary of Potential Annual Project Emissions with Siemens Turbines

| Pollutant | Single (one) Siemens Turbine (tpy) | Total for Three Siemens Turbines (tpy) | Emergency Generator Engine (tpy) | Emergency Fire Pump Engine (tpy) | Fugitive Losses of SF ₆ from Electrical Breakers (tpy) | Turbine Maintenance (tpy) | Fugitive Natural Gas Losses (tpy) | Total Project Emissions (tpy) |
|-------------------------|------------------------------------|--|----------------------------------|----------------------------------|---|---------------------------|-----------------------------------|-------------------------------|
| CO ₂ | 425,954 | 1,277,862 | 156.27 | 32.74 | - | 0.0063 | 0.18 | 1,278,052 |
| CH ₄ | 7.86 | 23.57 | 0.01 | 0.0013 | - | 0.12 | 3.30 | 26.99 |
| N ₂ O | 0.79 | 2.36 | 0.0013 | 0.00027 | - | - | - | 2.36 |
| SF ₆ | - | - | - | - | 0.01 | - | - | 0.01 |
| GHG (CO ₂ e) | 426,385 | 1,279,154 | 156.81 | 32.85 | 199.50 | 2.88 | 82.65 | 1,279,629 |

TABLE 5-8: Summary of Potential Annual Project Emissions with GE-7FA.05 Turbines

| Pollutant | Single (one) GE-7FA.05 Turbine (tpy) | Total for Three GE-7FA.05 Turbines (tpy) | Emergency Generator Engine (tpy) | Emergency Fire Pump Engine (tpy) | Fugitive Losses of SF ₆ from Electrical Breakers (tpy) | Turbine Maintenance (tpy) | Fugitive Natural Gas Losses (tpy) | Total Project Emissions (tpy) |
|-------------------------|--------------------------------------|--|----------------------------------|----------------------------------|---|---------------------------|-----------------------------------|-------------------------------|
| CO ₂ | 414,814 | 1,244,443 | 156.27 | 32.74 | - | 0.01 | 0.18 | 1,244,632 |
| CH ₄ | 7.65 | 22.95 | 0.01 | 0.0013 | - | 0.12 | 3.30 | 26.37 |
| N ₂ O | 0.77 | 2.30 | 0.0013 | 0.00027 | - | - | - | 2.30 |
| SF ₆ | - | - | - | - | 0.01 | - | - | 0.01 |
| GHG (CO ₂ e) | 415,233 | 1,245,700 | 156.81 | 32.85 | 199.50 | 2.88 | 82.65 | 1,246,175 |

TABLE 5-9: Summary of Potential Annual Project Emissions with GE-7FA.04 Turbines

| Pollutant | Single (one) GE-7FA.04 Turbine (tpy) | Total for Three GE-7FA.04 Turbines (tpy) | Emergency Generator Engine (tpy) | Emergency Fire Pump Engine (tpy) | Fugitive Losses of SF ₆ from Electrical Breakers (tpy) | Turbine Maintenance (tpy) | Fugitive Natural Gas Losses (tpy) | Total Project Emissions (tpy) |
|-------------------------|--------------------------------------|--|----------------------------------|----------------------------------|---|---------------------------|-----------------------------------|-------------------------------|
| CO ₂ | 383,550 | 1,150,650 | 156.27 | 32.74 | - | 0.01 | 0.18 | 1,150,839 |
| CH ₄ | 7.07 | 21.22 | 0.01 | 0.0013 | - | 0.12 | 3.30 | 24.64 |
| N ₂ O | 0.71 | 2.12 | 0.0013 | 0.00027 | - | - | - | 2.12 |
| SF ₆ | - | - | - | - | 0.01 | - | - | 0.01 |
| GHG (CO ₂ e) | 383,938 | 1,151,813 | 156.81 | 32.85 | 199.50 | 2.88 | 82.65 | 1,152,288 |

6.0

ADDITIONAL REQUIREMENTS UNDER PSD

An analysis of ambient air quality impacts is not provided with this application as there are no National Ambient Air Quality Standards (NAAQS) or PSD increments established for GHG (per EPA's *PSD and Title V Permitting Guidance for Greenhouse Gases*).

Since there are no NAAQS or PSD increments for GHGs, the requirements in sections 52.21(k) and 51.166(k) of EPA's regulations to demonstrate that a source does not cause contribute to a violation of the NAAQS are not applicable to GHGs. Therefore, there is no requirement to conduct dispersion modeling or ambient monitoring for CO₂ or GHGs.

Additionally, an analysis of Air Quality Related Values (AQRV) is not provided because GHG does not contribute to regional haze or terrestrial/aquatic acid deposition.

A pre-construction monitoring analysis for GHG is not being provided with this application in accordance with EPA's recommendations (per EPA's *PSD and Title V Permitting Guidance for Greenhouse Gases*):

EPA does not consider it necessary for applicants to gather monitoring data to assess ambient air quality for GHGs under section 52.21(m)(1)(ii), section 51.166(m)(1)(ii), or similar provisions that may be contained in state rules based on EPA's rules. GHGs do not affect "ambient air quality" in the sense that EPA intended when these parts of EPA's rules were initially drafted. Considering the nature of GHG emissions and their global impacts, EPA does not believe it is practical or appropriate to expect permitting authorities to collect monitoring data for purpose of assessing ambient air impacts of GHGs

6.1

IMPACT EVALUATION PURSUANT TO FEDERAL ACTION

6.1.1

Federal Endangered Species Act

Section 7 of the Federal Endangered Species Act (ESA) requires that any activity funded, authorized, or implemented by a federal agency does not jeopardize the continued existence of a listed species or result in the destruction or adverse modification of designated critical habitat (16 U.S.C. §1536). Under 40 CFR §402, federal agencies are required to prepare a biological assessment to determine the impact of the proposed action on endangered species. TRPP conducted this biological assessment and determined that the project will not adversely impact any federal or state-listed threatened and endangered species or critical habitat for these species. A copy of the biological assessment will be provided to USEPA Region 6 under separate cover.

6.1.2***National Historic Preservation Act***

Section 106 of the National Historic Preservation Act (NHPA) requires federal agencies to address the effects of their actions on historic properties and afford the Advisory Council for Historic Preservation (ACHP) the opportunity to comment on the impact to historic properties and preservation as result of federal action. TRPP conducted site survey in accordance with the survey methods defined in the Department of Interior Standard and Guidelines and the guidelines of the Council of Texas Archaeologists. Based on this survey, no sites of historical or cultural significance were identified that would be affected by this project. A copy of the historical and cultural resource assessment will be provided to USEPA Region 6 under separate cover.

TCEQ Permit Application Forms
Appendix A

March 3, 2014
Project No. 0189555

Environmental Resources Management
CityCentre Four
840 West Sam Houston Parkway North, Suite 600
Houston, Texas 77024-3920
(281) 600-1000



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 <i>(If other is checked please describe in space provided)</i> | | | |
| <input checked="" type="checkbox"/> New Permit, Registration or Authorization <i>(Core Data Form should be submitted with the program application)</i> | | | |
| <input type="checkbox"/> Renewal <i>(Core Data Form should be submitted with the renewal form)</i> | <input type="checkbox"/> Other | | |
| 2. Attachments Describe Any Attachments: <i>(ex. Title V Application, Waste Transporter Application, etc.)</i> | | | |
| <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | PSD Permit Application | |
| 3. Customer Reference Number <i>(if issued)</i> | | Follow this link to search for CN or RN numbers in Central Registry** | 4. Regulated Entity Reference Number <i>(if issued)</i> |
| CN | | | RN |

SECTION II: Customer Information

| | | | |
|--|--|---|---|
| 5. Effective Date for Customer Information Updates (mm/dd/yyyy) | | 7/22/2013 | |
| 6. Customer Role (Proposed or Actual) – as it relates to the <u>Regulated Entity</u> listed on this form. Please check only <u>one</u> of the following: | | | |
| <input type="checkbox"/> Owner | <input type="checkbox"/> Operator | <input checked="" type="checkbox"/> Owner & Operator | |
| <input type="checkbox"/> Occupational Licensee | <input type="checkbox"/> Responsible Party | <input type="checkbox"/> Voluntary Cleanup Applicant | <input type="checkbox"/> Other: _____ |
| 7. General Customer Information | | | |
| <input checked="" type="checkbox"/> New Customer | | <input type="checkbox"/> Update to Customer Information | <input type="checkbox"/> Change in Regulated Entity Ownership |
| <input type="checkbox"/> Change in Legal Name (Verifiable with the Texas Secretary of State) | | <input type="checkbox"/> No Change** | |
| **If "No Change" and Section I is complete, skip to Section III – Regulated Entity Information. | | | |
| 8. Type of Customer: | | <input checked="" type="checkbox"/> Corporation | <input type="checkbox"/> Individual |
| <input type="checkbox"/> City Government | <input type="checkbox"/> County Government | <input type="checkbox"/> Federal Government | <input type="checkbox"/> Sole Proprietorship- D.B.A |
| <input type="checkbox"/> Other Government | <input type="checkbox"/> General Partnership | <input type="checkbox"/> Limited Partnership | <input type="checkbox"/> Other: _____ |
| 9. Customer Legal Name <i>(If an individual, print last name first: ex: Doe, John)</i> | | <i>If new Customer, enter previous Customer below</i> | |
| Tenaska Roan's Prairie Partners, LLC | | End Date: | |
| 10. Mailing Address: | | | |
| 1044 N. 115 th Street, Suite 400 | | | |
| City | Omaha | State | NE |
| ZIP | 68154 | ZIP + 4 | 4446 |
| 11. Country Mailing Information <i>(if outside USA)</i> | | 12. E-Mail Address <i>(if applicable)</i> | |
| | | | |
| 13. Telephone Number | | 14. Extension or Code | 15. Fax Number <i>(if applicable)</i> |
| (402) 938-1661 | | | (402) 691-9530 |
| 16. Federal Tax ID <i>(9 digits)</i> | 17. TX State Franchise Tax ID <i>(11 digits)</i> | 18. DUNS Number <i>(if applicable)</i> | 19. TX SOS Filing Number <i>(if applicable)</i> |
| 462009341 | TBD | 78708590 | |
| 20. Number of Employees | | | 21. Independently Owned and Operated? |
| <input checked="" type="checkbox"/> 0-20 | <input type="checkbox"/> 21-100 | <input type="checkbox"/> 101-250 | <input type="checkbox"/> 251-500 |
| <input type="checkbox"/> 501 and higher | <input checked="" type="checkbox"/> Yes | | <input type="checkbox"/> No |

SECTION III: Regulated Entity Information

| | | | |
|---|---|---|--|
| 22. General Regulated Entity Information <i>(If 'New Regulated Entity' is selected below this form should be accompanied by a permit application)</i> | | | |
| <input checked="" type="checkbox"/> New Regulated Entity | | | |
| <input type="checkbox"/> Update to Regulated Entity Name | <input type="checkbox"/> Update to Regulated Entity Information | <input type="checkbox"/> No Change** <i>(See below)</i> | |
| **If "NO CHANGE" is checked and Section I is complete, skip to Section IV, Preparer Information. | | | |
| 23. Regulated Entity Name <i>(name of the site where the regulated action is taking place)</i> | | | |
| Tenaska Roan's Prairie Generating Station | | | |

US EPA ARCHIVE DOCUMENT

| | | | | | | | | |
|--|---|-------|---|---------------------------------------|---|-------|----------------|------|
| 24. Street Address of the Regulated Entity: <i>(No P.O. Boxes)</i> | 1044 N. 115 th Street, Suite 400 | | | | | | | |
| | City | Omaha | State | NE | ZIP | 68154 | ZIP + 4 | 4446 |
| 25. Mailing Address: | 1044 N. 115 th Street, Suite 400 | | | | | | | |
| | City | Omaha | State | NE | ZIP | 68154 | ZIP + 4 | 4446 |
| 26. E-Mail Address: | lcarlson@tenaska.com | | | | | | | |
| 27. Telephone Number | 28. Extension or Code | | | 29. Fax Number (if applicable) | | | | |
| (402) 938-1661 | | | | (402) 691-9530 | | | | |
| 30. Primary SIC Code (4 digits) | 31. Secondary SIC Code (4 digits) | | 32. Primary NAICS Code (5 or 6 digits) | | 33. Secondary NAICS Code (5 or 6 digits) | | | |
| 4911 | | | 221112 | | | | | |
| 34. What is the Primary Business of this entity? (Please do not repeat the SIC or NAICS description.) | | | | | | | | |
| Electricity Generation | | | | | | | | |

Questions 34 – 37 address geographic location. Please refer to the instructions for applicability.

| | | | | | | | | |
|--|--|---------|---------|--------------------------------------|---------|-------------------------|--|--|
| 35. Description to Physical Location: | From College Station, Texas, head northeast on Farm to Market Rd 60/University Dr. toward Jane St. Turn right onto TX-6 Frontage S. Turn left onto Harvey Rd. Slight right onto TX-10 E. Site is approximately 22.4 miles down TX-30 E on the right hand side. | | | | | | | |
| 36. Nearest City | County | | | State | | Nearest ZIP Code | | |
| Shiro | Grimes | | | TX | | 77873 | | |
| 37. Latitude (N) In Decimal: | 30.587816 | | | 38. Longitude (W) In Decimal: | | -95.927297 | | |
| Degrees | Minutes | Seconds | Degrees | Minutes | Seconds | | | |
| 30 | 35 | 16.1376 | -95 | 55 | 38.2686 | | | |

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 or the updates may not be made. If your Program is not listed, check other and write it in. See the Core Data Form instructions for additional guidance.

| | | | | |
|---|--|---|---|--|
| <input type="checkbox"/> Dam Safety | <input type="checkbox"/> Districts | <input type="checkbox"/> Edwards Aquifer | <input type="checkbox"/> Industrial Hazardous Waste | <input type="checkbox"/> Municipal Solid Waste |
| <input checked="" type="checkbox"/> New Source Review – Air | <input type="checkbox"/> OSSF | <input type="checkbox"/> Petroleum Storage Tank | <input type="checkbox"/> PWS | <input type="checkbox"/> Sludge |
| <input type="checkbox"/> Stormwater | <input type="checkbox"/> Title V – Air | <input type="checkbox"/> Tires | <input type="checkbox"/> Used Oil | <input type="checkbox"/> Utilities |
| <input type="checkbox"/> Voluntary Cleanup | <input type="checkbox"/> Waste Water | <input type="checkbox"/> Wastewater Agriculture | <input type="checkbox"/> Water Rights | <input type="checkbox"/> Other: |


SECTION IV: Preparer Information

| | | | |
|-----------------------------|----------------------|-----------------------|---------------------------|
| 40. Name: | ERM | 41. Title: | Consultant |
| 42. Telephone Number | 43. Ext./Code | 44. Fax Number | 45. E-Mail Address |
| (281) 600-1000 | 1019 | (281) 600-1001 | peter.belmonte@erm.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 9 and/or as required for the updates to the ID numbers identified in field 39.

(See the Core Data Form instructions for more information on who should sign this form.)

| | | | |
|-------------------------|---|-------------------|---|
| Company: | Tenaska Roan's Prairie Partners, LLC | Job Title: | Sr Vice President, Engineering and Construction |
| Name (In Print): | Nicholas Borman | Phone: | (402) 691-9500 |
| Signature: |  | Date: | March 4, 2014 |



**Texas Commission on Environmental Quality
Form PI-1 General Application for
Air Preconstruction Permit and Amendment**

Important Note: The agency **requires** that a Core Data Form be submitted on all incoming applications unless a Regulated Entity and Customer Reference Number have been issued *and* no core data information has changed. For more information regarding the Core Data Form, call (512) 239-5175 or go to www.tceq.texas.gov/permitting/central_registry/guidance.html.

| | | | |
|--|-----------------------|---|---|
| I. Applicant Information | | | |
| A. Company or Other Legal Name: Tenaska Roan's Prairie Partners, LLC | | | |
| Texas Secretary of State Charter/Registration Number (<i>if applicable</i>): | | | |
| B. Company Official Contact Name: Mr. Greg Kunkel | | | |
| Title: Vice President, Environmental Affairs | | | |
| Mailing Address: 1044 N. 115 th Street, Suite 400 | | | |
| City: Omaha | | State: NE | ZIP Code: 68154-4446 |
| Telephone No.: 402-691-9500 | Fax No.: 402-691-9530 | E-mail Address: gkunkel@tenaska.com | |
| C. Technical Contact Name: Mr. Larry Carlson | | | |
| Title: Director, Air Programs | | | |
| Company Name: Tenaska, Inc. | | | |
| Mailing Address: 1044 N. 115 th Street, Suite 400 | | | |
| City: Omaha | | State: NE | ZIP Code: 68154-4446 |
| Telephone No.: 402-938-1661 | Fax No.: 402-691-9530 | E-mail Address: lcarlson@tenaska.com | |
| D. Site Name: Tenaska Roan's Prairie Generating Station | | | |
| E. Area Name/Type of Facility: Electric Generating Station | | | <input checked="" type="checkbox"/> Permanent <input type="checkbox"/> Portable |
| F. Principal Company Product or Business: Electricity Generation | | | |
| Principal Standard Industrial Classification Code (SIC): 4911 | | | |
| Principal North American Industry Classification System (NAICS): 221112 | | | |
| G. Projected Start of Construction Date: January 2015 | | | |
| Projected Start of Operation Date: June 2016 | | | |
| H. Facility and Site Location Information (If no street address, provide clear driving directions to the site in writing.): | | | |
| From College Station, Texas, head northeast on Farm to Market Rd 60/University Dr. toward Jane St. Turn right onto TX-6 Frontage S. Turn left onto Harvey Rd. Slight right onto TX-30 E. Site is approximately 22.4 miles down TX-30 E on the right hand side. | | | |
| City/Town: Shiro | | County: Grimes | ZIP Code: 77873 |
| Latitude (nearest second): 30° 35' 16" N | | Longitude (nearest second): 95° 55' 38" W | |

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| | |
|---|---|
| I. Applicant Information (continued) | |
| I. Account Identification Number (leave blank if new site or facility): | |
| J. Core Data Form. | |
| Is the Core Data Form (Form 10400) attached? If <i>No</i> , provide customer reference number and regulated entity number (complete K and L). | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO |
| K. Customer Reference Number (CN): | |
| L. Regulated Entity Number (RN): | |
| II. General Information | |
| A. Is confidential information submitted with this application? If <i>Yes</i> , mark each confidential page confidential in large red letters at the bottom of each page. | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO |
| B. Is this application in response to an investigation or enforcement action? If <i>Yes</i> , attach a copy of any correspondence from the agency. | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |
| C. Number of New Jobs: 0-20 | |
| D. Provide the name of the State Senator and State Representative and district numbers for this facility site: | |
| Senator: Charles Schwertner | District No.: 5 |
| Representative: Lois W. Kolkhorst | District No.: 13 |
| III. Type of Permit Action Requested | |
| A. Mark the appropriate box indicating what type of action is requested. | |
| Initial <input checked="" type="checkbox"/> Amendment <input type="checkbox"/> Revision (30 TAC 116.116(e)) <input type="checkbox"/> Change of Location <input type="checkbox"/> Relocation <input type="checkbox"/> | |
| B. Permit Number (if existing): TBD | |
| C. Permit Type: Mark the appropriate box indicating what type of permit is requested. (<i>check all that apply, skip for change of location</i>) | |
| Construction <input checked="" type="checkbox"/> Flexible <input type="checkbox"/> Multiple Plant <input type="checkbox"/> Nonattainment <input type="checkbox"/> Prevention of Significant Deterioration <input checked="" type="checkbox"/> | |
| Hazardous Air Pollutant Major Source <input type="checkbox"/> Plant-Wide Applicability Limit <input type="checkbox"/> | |
| Other: _____ | |
| D. Is a permit renewal application being submitted in conjunction with this amendment in accordance with 30 TAC 116.315(c). | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |



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| III. Type of Permit Action Requested (continued) | | |
|--|---------|---|
| E. Is this application for a change of location of previously permitted facilities? If Yes, complete III.E.1 - III.E.4. | | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |
| 1. Current Location of Facility (If no street address, provide clear driving directions to the site in writing.): | | |
| Street Address: | | |
| City: | County: | ZIP Code: |
| 2. Proposed Location of Facility (If no street address, provide clear driving directions to the site in writing.): | | |
| Street Address: | | |
| City: | County: | ZIP Code: |
| 3. Will the proposed facility, site, and plot plan meet all current technical requirements of the permit special conditions? If <i>No</i> , attach detailed information. | | <input type="checkbox"/> YES <input type="checkbox"/> NO |
| 4. Is the site where the facility is moving considered a major source of criteria pollutants or HAPs? | | <input type="checkbox"/> YES <input type="checkbox"/> NO |
| F. Consolidation into this Permit: List any standard permits, exemptions or permits by rule to be consolidated into this permit including those for planned maintenance, startup, and shutdown. | | |
| List: | | |
| G. Are you permitting planned maintenance, startup, and shutdown emissions? If <i>Yes</i> , attach information on any changes to emissions under this application as specified in VII and VIII. | | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO |
| H. Federal Operating Permit Requirements (30 TAC Chapter 122 Applicability) | | |
| Is this facility located at a site required to obtain a federal operating permit? If <i>Yes</i> , list all associated permit number(s), attach pages as needed). | | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> To be determined |
| Associated Permit No (s.): TBD | | |
| 1. Identify the requirements of 30 TAC Chapter 122 that will be triggered if this application is approved. | | |
| FOP Significant Revision <input type="checkbox"/> FOP Minor <input type="checkbox"/> Application for an FOP Revision <input type="checkbox"/> To Be Determined <input type="checkbox"/> | | |
| Operational Flexibility/Off-Permit Notification <input type="checkbox"/> Streamlined Revision for GOP <input type="checkbox"/> None <input checked="" type="checkbox"/> | | |



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| | |
|---|---|
| III. Type of Permit Action Requested (continued) | |
| H. Federal Operating Permit Requirements (30 TAC Chapter 122 Applicability) (continued) | |
| 2. Identify the type(s) of FOP(s) issued and/or FOP application(s) submitted/pending for the site. (check all that apply) | |
| GOP Issued <input type="checkbox"/> | GOP application/revision application submitted or under APD review <input type="checkbox"/> |
| SOP Issued <input type="checkbox"/> | SOP application/revision application submitted or under APD review <input type="checkbox"/> |
| IV. Public Notice Applicability | |
| A. Is this a new permit application or a change of location application? | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO |
| B. Is this application for a concrete batch plant? If Yes, complete V.C.1 – V.C.2. | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |
| C. Is this an application for a major modification of a PSD, nonattainment, FCAA 112(g) permit, or exceedance of a PAL permit? | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |
| D. Is this application for a PSD or major modification of a PSD located within 100 kilometers or less of an affected state or Class I Area? | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |
| If Yes, list the affected state(s) and/or Class I Area(s). | |
| E. Is this a state permit amendment application? If Yes, complete IV.E.1. – IV.E.3. --- NO | |
| 1. Is there any change in character of emissions in this application? | <input type="checkbox"/> YES <input type="checkbox"/> NO |
| 2. Is there a new air contaminant in this application? | <input type="checkbox"/> YES <input type="checkbox"/> NO |
| 3. Do the facilities handle, load, unload, dry, manufacture, or process grain, seed, legumes, or vegetables fibers (agricultural facilities)? | <input type="checkbox"/> YES <input type="checkbox"/> NO |
| F. List the total annual emission increases associated with the application (<i>list all that apply and attach additional sheets as needed</i>): | |
| Volatile Organic Compounds (VOC): 35.71 tpy | |
| Sulfur Dioxide (SO ₂): 12.99 tpy | |
| Carbon Monoxide (CO): 377.17 tpy | |
| Nitrogen Oxides (NO _x): 336.26 tpy | |
| Particulate Matter (PM): 44.55 tpy | |
| PM ₁₀ microns or less (PM ₁₀): 44.55 tpy | |
| PM _{2.5} microns or less (PM _{2.5}): 44.55 tpy | |
| Sulfuric Acid Mist (H ₂ SO ₄): 1.31 tpy | |
| Lead (Pb): 0.042 tpy | |
| Hazardous Air Pollutants (HAPs): 6.33 tpy | |
| Other speciated air contaminants not listed above: CO ₂ = 1,150,839 tpy, CO _{2e} = 1,152,288 tpy | |



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| | | |
|--|----------------|---|
| V. Public Notice Information (complete if applicable) | | |
| A. Public Notice Contact Name: Ms. Christie Couvillion | | |
| Title: Sr. Environmental Specialist | | |
| Mailing Address: 1044 N. 115 th Street, Suite 400 | | |
| City: Omaha | State: NE | ZIP Code: 68154-4446 |
| Telephone No.: 402-691-9500 | | |
| B. Name of the Public Place: Navasota Public Library | | |
| Physical Address (No P.O. Boxes): 1411 E. Washington Ave. | | |
| City: Navasota | County: Grimes | ZIP Code: 77868 |
| The public place has granted authorization to place the application for public viewing and copying. | | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO |
| The public place has internet access available for the public. | | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO |
| C. Concrete Batch Plants, PSD, and Nonattainment Permits | | |
| 1. County Judge Information (For Concrete Batch Plants and PSD and/or Nonattainment Permits) for this facility site. | | |
| The Honorable: Betty Shiflett | | |
| Mailing Address: P.O. Box 160 | | |
| City: Anderson | State: Texas | ZIP Code: 77830 |
| 2. Is the facility located in a municipality or an extraterritorial jurisdiction of a municipality? (For Concrete Batch Plants) | | <input type="checkbox"/> YES <input type="checkbox"/> NO |
| Presiding Officers Name(s): N/A | | |
| Title: | | |
| Mailing Address: | | |
| City: | State: | ZIP Code: |
| 3. Provide the name, mailing address of the chief executive of the city for the location where the facility is or will be located. | | |
| Chief Executive: Mayor Gail Sowell | | |
| Mailing Address: P.O. Box 592 | | |
| City: Anderson | State: Texas | ZIP Code: 77830 |



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Form PI-1 General Application for
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| | | |
|---|---|-----------|
| V. Public Notice Information (complete if applicable) (continued) | | |
| 3. Provide the name, mailing address of the Indian Governing Body for the location where the facility is or will be located. <i>(continued)</i> | | |
| Name of the Indian Governing Body: N/A | | |
| Title: | | |
| Mailing Address: | | |
| City: | State: | ZIP Code: |
| D. Bilingual Notice | | |
| Is a bilingual program required by the Texas Education Code in the School District? | <input checked="" type="checkbox"/> YES <input type="checkbox"/> 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? | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO | |
| If <i>Yes</i> , list which languages are required by the bilingual program? | | |
| Spanish | | |
| VI. Small Business Classification (Required) | | |
| A. Does this company (including parent companies and subsidiary companies) have fewer than 100 employees or less than \$6 million in annual gross receipts? | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO | |
| B. Is the site a major stationary source for federal air quality permitting? | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO | |
| C. Are the site emissions of any regulated air pollutant greater than or equal to 50 tpy? | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO | |
| D. Are the site emissions of all regulated air pollutants combined less than 75 tpy? | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO | |
| VII. Technical Information | | |
| A. The following information must be submitted with your Form PI-1 (this is just a checklist to make sure you have included everything) | | |
| 1. Current Area Map <input checked="" type="checkbox"/> | | |
| 2. Plot Plan <input checked="" type="checkbox"/> | | |
| 3. Existing Authorizations <input checked="" type="checkbox"/> | | |
| 4. Process Flow Diagram <input checked="" type="checkbox"/> | | |
| 5. Process Description <input checked="" type="checkbox"/> | | |
| 6. Maximum Emissions Data and Calculations <input checked="" type="checkbox"/> | | |
| 7. Air Permit Application Tables <input checked="" type="checkbox"/> | | |
| a. Table 1(a) (Form 10153) entitled, Emission Point Summary <input checked="" type="checkbox"/> | | |
| b. Table 2 (Form 10155) entitled, Material Balance <input checked="" type="checkbox"/> | | |
| c. Other equipment, process or control device tables <input checked="" type="checkbox"/> | | |



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| | | | |
|---|-------------|-------------|---|
| VII. Technical Information | | | |
| B. Are any schools located within 3,000 feet of this facility? | | | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |
| C. Maximum Operating Schedule: | | | |
| Hours: 24 | Day(s): 365 | Week(s): 52 | Year(s): 8,760 hrs/yr |
| Seasonal Operation? If Yes, please describe in the space provide below. | | | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |
| | | | |
| D. Have the planned MSS emissions been previously submitted as part of an emissions inventory? | | | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |
| Provide a list of each planned MSS facility or related activity and indicate which years the MSS activities have been included in the emissions inventories. Attach pages as needed. | | | |
| | | | |
| E. Does this application involve any air contaminants for which a <i>disaster review</i> is required? | | | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |
| F. Does this application include a pollutant of concern on the <i>Air Pollutant Watch List (APWL)</i> ? | | | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |
| VIII. State Regulatory Requirements | | | |
| Applicants must demonstrate compliance with all applicable state regulations to obtain a permit or amendment. <i>The application must contain detailed attachments addressing applicability or non applicability; identify state regulations; show how requirements are met; and include compliance demonstrations.</i> | | | |
| A. Will the emissions from the proposed facility protect public health and welfare, and comply with all rules and regulations of the TCEQ? | | | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO |
| B. Will emissions of significant air contaminants from the facility be measured? | | | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO |
| C. Is the Best Available Control Technology (BACT) demonstration attached? | | | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO |
| D. Will the proposed facilities achieve the performance represented in the permit application as demonstrated through recordkeeping, monitoring, stack testing, or other applicable methods? | | | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO |
| IX. Federal Regulatory Requirements | | | |
| Applicants must demonstrate compliance with all applicable federal regulations to obtain a permit or amendment <i>The application must contain detailed attachments addressing applicability or non applicability; identify federal regulation subparts; show how requirements are met; and include compliance demonstrations.</i> | | | |
| A. Does Title 40 Code of Federal Regulations Part 60, (40 CFR Part 60) New Source Performance Standard (NSPS) apply to a facility in this application? | | | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO |
| B. Does 40 CFR Part 61, National Emissions Standard for Hazardous Air Pollutants (NESHAP) apply to a facility in this application? | | | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |
| C. Does 40 CFR Part 63, Maximum Achievable Control Technology (MACT) standard apply to a facility in this application? | | | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO |



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|---|--|
| IX. Federal Regulatory Requirements | |
| <i>Applicants must demonstrate compliance with all applicable federal regulations to obtain a permit or amendment. The application must contain detailed attachments addressing applicability or non applicability; identify federal regulation subparts; show how requirements are met; and include compliance demonstrations.</i> | |
| D. Do nonattainment permitting requirements apply to this application? | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |
| E. Do prevention of significant deterioration permitting requirements apply to this application? | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO |
| F. Do Hazardous Air Pollutant Major Source [FCAA 112(g)] requirements apply to this application? | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |
| G. Is a Plant-wide Applicability Limit permit being requested? | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |
| X. Professional Engineer (P.E.) Seal | |
| Is the estimated capital cost of the project greater than \$2 million dollars? | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO |
| If Yes, submit the application under the seal of a Texas licensed P.E. | |
| XI. Permit Fee Information | |
| Check, Money Order, Transaction Number ,ePay Voucher Number: N/A | Fee Amount: N/A |
| Company name on check: Tenaska, Inc. | Paid online?: <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |
| Is a copy of the check or money order attached to the original submittal of this application? | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A |
| Is a Table 30 (Form 10196) entitled, Estimated Capital Cost and Fee Verification, attached? | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A |



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XII. 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 is 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.

XIII. 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. 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, Texas Clean Air Act (TCAA), as amended, or any of the air quality rules and regulations 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: Nicholas Borman, Sr Vice President, Engineering and Construction

Signature: _____

N Borman

Original Signature Required

Date: _____

March 4, 2014

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Important Note: The agency **requires** that a Core Data Form be submitted on all incoming applications unless a Regulated Entity and Customer Reference Number have been issued *and* no core data information has changed. For more information regarding the Core Data Form, call (512) 239-5175 or go to www.tceq.texas.gov/permitting/central_registry/guidance.html.

| | | | |
|--|-----------------------|---|---|
| I. Applicant Information | | | |
| A. Company or Other Legal Name: Tenaska Roan's Prairie Partners, LLC | | | |
| Texas Secretary of State Charter/Registration Number (<i>if applicable</i>): | | | |
| B. Company Official Contact Name: Mr. Greg Kunkel | | | |
| Title: Vice President, Environmental Affairs | | | |
| Mailing Address: 1044 N. 115 th Street, Suite 400 | | | |
| City: Omaha | | State: NE | ZIP Code: 68154-4446 |
| Telephone No.: 402-691-9500 | Fax No.: 402-691-9530 | E-mail Address: gkunkel@tenaska.com | |
| C. Technical Contact Name: Mr. Larry Carlson | | | |
| Title: Director, Air Programs | | | |
| Company Name: Tenaska, Inc. | | | |
| Mailing Address: 1044 N. 115 th Street, Suite 400 | | | |
| City: Omaha | | State: NE | ZIP Code: 68154-4446 |
| Telephone No.: 402-938-1661 | Fax No.: 402-691-9530 | E-mail Address: lcarlson@tenaska.com | |
| D. Site Name: Tenaska Roan's Prairie Generating Station | | | |
| E. Area Name/Type of Facility: Electric Generating Station | | | <input checked="" type="checkbox"/> Permanent <input type="checkbox"/> Portable |
| F. Principal Company Product or Business: Electricity Generation | | | |
| Principal Standard Industrial Classification Code (SIC): 4911 | | | |
| Principal North American Industry Classification System (NAICS): 221112 | | | |
| G. Projected Start of Construction Date: January 2015 | | | |
| Projected Start of Operation Date: June 2016 | | | |
| H. Facility and Site Location Information (If no street address, provide clear driving directions to the site in writing.): | | | |
| From College Station, Texas, head northeast on Farm to Market Rd 60/University Dr. toward Jane St. Turn right onto TX-6 Frontage S. Turn left onto Harvey Rd. Slight right onto TX-30 E. Site is approximately 22.4 miles down TX-30 E on the right hand side. | | | |
| City/Town: Shiro | | County: Grimes | ZIP Code: 77873 |
| Latitude (nearest second): 30° 35' 16" N | | Longitude (nearest second): 95° 55' 38" W | |

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| | |
|---|---|
| I. Applicant Information (continued) | |
| I. Account Identification Number (leave blank if new site or facility): | |
| J. Core Data Form. | |
| Is the Core Data Form (Form 10400) attached? If <i>No</i> , provide customer reference number and regulated entity number (complete K and L). | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO |
| K. Customer Reference Number (CN): | |
| L. Regulated Entity Number (RN): | |
| II. General Information | |
| A. Is confidential information submitted with this application? If <i>Yes</i> , mark each confidential page confidential in large red letters at the bottom of each page. | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO |
| B. Is this application in response to an investigation or enforcement action? If <i>Yes</i> , attach a copy of any correspondence from the agency. | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |
| C. Number of New Jobs: 0-20 | |
| D. Provide the name of the State Senator and State Representative and district numbers for this facility site: | |
| Senator: Charles Schwertner | District No.: 5 |
| Representative: Lois W. Kolkhorst | District No.: 13 |
| III. Type of Permit Action Requested | |
| A. Mark the appropriate box indicating what type of action is requested. | |
| Initial <input checked="" type="checkbox"/> Amendment <input type="checkbox"/> Revision (30 TAC 116.116(e)) <input type="checkbox"/> Change of Location <input type="checkbox"/> Relocation <input type="checkbox"/> | |
| B. Permit Number (if existing): TBD | |
| C. Permit Type: Mark the appropriate box indicating what type of permit is requested. (<i>check all that apply, skip for change of location</i>) | |
| Construction <input checked="" type="checkbox"/> Flexible <input type="checkbox"/> Multiple Plant <input type="checkbox"/> Nonattainment <input type="checkbox"/> Prevention of Significant Deterioration <input checked="" type="checkbox"/> | |
| Hazardous Air Pollutant Major Source <input type="checkbox"/> Plant-Wide Applicability Limit <input type="checkbox"/> | |
| Other: _____ | |
| D. Is a permit renewal application being submitted in conjunction with this amendment in accordance with 30 TAC 116.315(c). | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |



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|---|---------|---|
| III. Type of Permit Action Requested (continued) | | |
| E. Is this application for a change of location of previously permitted facilities? If Yes, complete III.E.1 - III.E.4. | | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |
| 1. Current Location of Facility (If no street address, provide clear driving directions to the site in writing.): | | |
| Street Address: | | |
| | | |
| City: | County: | ZIP Code: |
| 2. Proposed Location of Facility (If no street address, provide clear driving directions to the site in writing.): | | |
| Street Address: | | |
| | | |
| City: | County: | ZIP Code: |
| 3. Will the proposed facility, site, and plot plan meet all current technical requirements of the permit special conditions? If <i>No</i> , attach detailed information. | | <input type="checkbox"/> YES <input type="checkbox"/> NO |
| 4. Is the site where the facility is moving considered a major source of criteria pollutants or HAPs? | | <input type="checkbox"/> YES <input type="checkbox"/> NO |
| F. Consolidation into this Permit: List any standard permits, exemptions or permits by rule to be consolidated into this permit including those for planned maintenance, startup, and shutdown. | | |
| List: | | |
| | | |
| G. Are you permitting planned maintenance, startup, and shutdown emissions? If <i>Yes</i> , attach information on any changes to emissions under this application as specified in VII and VIII. | | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO |
| H. Federal Operating Permit Requirements (30 TAC Chapter 122 Applicability) | | |
| Is this facility located at a site required to obtain a federal operating permit? If <i>Yes</i> , list all associated permit number(s), attach pages as needed). | | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> To be determined |
| Associated Permit No (s.): TBD | | |
| 1. Identify the requirements of 30 TAC Chapter 122 that will be triggered if this application is approved. | | |
| FOP Significant Revision <input type="checkbox"/> FOP Minor <input type="checkbox"/> Application for an FOP Revision <input type="checkbox"/> To Be Determined <input type="checkbox"/> | | |
| Operational Flexibility/Off-Permit Notification <input type="checkbox"/> Streamlined Revision for GOP <input type="checkbox"/> None <input checked="" type="checkbox"/> | | |



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| III. Type of Permit Action Requested (continued) | |
| H. Federal Operating Permit Requirements (30 TAC Chapter 122 Applicability) (continued) | |
| 2. Identify the type(s) of FOP(s) issued and/or FOP application(s) submitted/pending for the site. (check all that apply) | |
| GOP Issued <input type="checkbox"/> | GOP application/revision application submitted or under APD review <input type="checkbox"/> |
| SOP Issued <input type="checkbox"/> | SOP application/revision application submitted or under APD review <input type="checkbox"/> |
| IV. Public Notice Applicability | |
| A. Is this a new permit application or a change of location application? | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO |
| B. Is this application for a concrete batch plant? If Yes, complete V.C.1 – V.C.2. | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |
| C. Is this an application for a major modification of a PSD, nonattainment, FCAA 112(g) permit, or exceedance of a PAL permit? | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |
| D. Is this application for a PSD or major modification of a PSD located within 100 kilometers or less of an affected state or Class I Area? | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |
| If Yes, list the affected state(s) and/or Class I Area(s). | |
| E. Is this a state permit amendment application? If Yes, complete IV.E.1. – IV.E.3. --- NO | |
| 1. Is there any change in character of emissions in this application? | <input type="checkbox"/> YES <input type="checkbox"/> NO |
| 2. Is there a new air contaminant in this application? | <input type="checkbox"/> YES <input type="checkbox"/> NO |
| 3. Do the facilities handle, load, unload, dry, manufacture, or process grain, seed, legumes, or vegetables fibers (agricultural facilities)? | <input type="checkbox"/> YES <input type="checkbox"/> NO |
| F. List the total annual emission increases associated with the application (<i>list all that apply and attach additional sheets as needed</i>): | |
| Volatile Organic Compounds (VOC): 88.27 tpy | |
| Sulfur Dioxide (SO ₂): 13.97 tpy | |
| Carbon Monoxide (CO): 595.07 tpy | |
| Nitrogen Oxides (NO _x): 368.01 tpy | |
| Particulate Matter (PM): 44.55 tpy | |
| PM ₁₀ microns or less (PM ₁₀): 44.55 tpy | |
| PM _{2.5} microns or less (PM _{2.5}): 44.55 tpy | |
| Sulfuric Acid Mist (H ₂ SO ₄): 1.40 tpy | |
| Lead (Pb): 0.045 tpy | |
| Hazardous Air Pollutants (HAPs): 6.84 tpy | |
| Other speciated air contaminants not listed above: CO ₂ = 1,244,632 tpy, CO _{2e} = 1,246,175 tpy | |



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| V. Public Notice Information (complete if applicable) | | |
| A. Public Notice Contact Name: Ms. Christie Couvillion | | |
| Title: Sr. Environmental Specialist | | |
| Mailing Address: 1044 N. 115 th Street, Suite 400 | | |
| City: Omaha | State: NE | ZIP Code: 68154-4446 |
| Telephone No.: 402-691-9500 | | |
| B. Name of the Public Place: Navasota Public Library | | |
| Physical Address (No P.O. Boxes): 1411 E. Washington Ave. | | |
| City: Navasota | County: Grimes | ZIP Code: 77868 |
| The public place has granted authorization to place the application for public viewing and copying. | | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO |
| The public place has internet access available for the public. | | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO |
| C. Concrete Batch Plants, PSD, and Nonattainment Permits | | |
| 1. County Judge Information (For Concrete Batch Plants and PSD and/or Nonattainment Permits) for this facility site. | | |
| The Honorable: Betty Shiflett | | |
| Mailing Address: P.O. Box 160 | | |
| City: Anderson | State: Texas | ZIP Code: 77830 |
| 2. Is the facility located in a municipality or an extraterritorial jurisdiction of a municipality? (For Concrete Batch Plants) | | <input type="checkbox"/> YES <input type="checkbox"/> NO |
| Presiding Officers Name(s): N/A | | |
| Title: | | |
| Mailing Address: | | |
| City: | State: | ZIP Code: |
| 3. Provide the name, mailing address of the chief executive of the city for the location where the facility is or will be located. | | |
| Chief Executive: Mayor Gail Sowell | | |
| Mailing Address: P.O. Box 592 | | |
| City: Anderson | State: Texas | ZIP Code: 77830 |



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| V. Public Notice Information (complete if applicable) (continued) | | |
| 3. Provide the name, mailing address of the Indian Governing Body for the location where the facility is or will be located. <i>(continued)</i> | | |
| Name of the Indian Governing Body: N/A | | |
| Title: | | |
| Mailing Address: | | |
| City: | State: | ZIP Code: |
| D. Bilingual Notice | | |
| Is a bilingual program required by the Texas Education Code in the School District? | <input checked="" type="checkbox"/> YES <input type="checkbox"/> 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? | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO | |
| If <i>Yes</i> , list which languages are required by the bilingual program? | | |
| Spanish | | |
| VI. Small Business Classification (Required) | | |
| A. Does this company (including parent companies and subsidiary companies) have fewer than 100 employees or less than \$6 million in annual gross receipts? | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO | |
| B. Is the site a major stationary source for federal air quality permitting? | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO | |
| C. Are the site emissions of any regulated air pollutant greater than or equal to 50 tpy? | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO | |
| D. Are the site emissions of all regulated air pollutants combined less than 75 tpy? | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO | |
| VII. Technical Information | | |
| A. The following information must be submitted with your Form PI-1 (this is just a checklist to make sure you have included everything) | | |
| 1. Current Area Map <input checked="" type="checkbox"/> | | |
| 2. Plot Plan <input checked="" type="checkbox"/> | | |
| 3. Existing Authorizations <input checked="" type="checkbox"/> | | |
| 4. Process Flow Diagram <input checked="" type="checkbox"/> | | |
| 5. Process Description <input checked="" type="checkbox"/> | | |
| 6. Maximum Emissions Data and Calculations <input checked="" type="checkbox"/> | | |
| 7. Air Permit Application Tables <input checked="" type="checkbox"/> | | |
| a. Table 1(a) (Form 10153) entitled, Emission Point Summary <input checked="" type="checkbox"/> | | |
| b. Table 2 (Form 10155) entitled, Material Balance <input checked="" type="checkbox"/> | | |
| c. Other equipment, process or control device tables <input checked="" type="checkbox"/> | | |



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| VII. Technical Information | | | |
| B. Are any schools located within 3,000 feet of this facility? | | | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |
| C. Maximum Operating Schedule: | | | |
| Hours: 24 | Day(s): 365 | Week(s): 52 | Year(s): 2,920 hrs/yr |
| Seasonal Operation? If Yes, please describe in the space provide below. | | | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |
| | | | |
| D. Have the planned MSS emissions been previously submitted as part of an emissions inventory? | | | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |
| Provide a list of each planned MSS facility or related activity and indicate which years the MSS activities have been included in the emissions inventories. Attach pages as needed. | | | |
| | | | |
| E. Does this application involve any air contaminants for which a <i>disaster review</i> is required? | | | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |
| F. Does this application include a pollutant of concern on the <i>Air Pollutant Watch List (APWL)</i> ? | | | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |
| VIII. State Regulatory Requirements | | | |
| Applicants must demonstrate compliance with all applicable state regulations to obtain a permit or amendment. <i>The application must contain detailed attachments addressing applicability or non applicability; identify state regulations; show how requirements are met; and include compliance demonstrations.</i> | | | |
| A. Will the emissions from the proposed facility protect public health and welfare, and comply with all rules and regulations of the TCEQ? | | | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO |
| B. Will emissions of significant air contaminants from the facility be measured? | | | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO |
| C. Is the Best Available Control Technology (BACT) demonstration attached? | | | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO |
| D. Will the proposed facilities achieve the performance represented in the permit application as demonstrated through recordkeeping, monitoring, stack testing, or other applicable methods? | | | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO |
| IX. Federal Regulatory Requirements | | | |
| Applicants must demonstrate compliance with all applicable federal regulations to obtain a permit or amendment <i>The application must contain detailed attachments addressing applicability or non applicability; identify federal regulation subparts; show how requirements are met; and include compliance demonstrations.</i> | | | |
| A. Does Title 40 Code of Federal Regulations Part 60, (40 CFR Part 60) New Source Performance Standard (NSPS) apply to a facility in this application? | | | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO |
| B. Does 40 CFR Part 61, National Emissions Standard for Hazardous Air Pollutants (NESHAP) apply to a facility in this application? | | | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |
| C. Does 40 CFR Part 63, Maximum Achievable Control Technology (MACT) standard apply to a facility in this application? | | | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO |



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| IX. Federal Regulatory Requirements | |
| <i>Applicants must demonstrate compliance with all applicable federal regulations to obtain a permit or amendment. The application must contain detailed attachments addressing applicability or non applicability; identify federal regulation subparts; show how requirements are met; and include compliance demonstrations.</i> | |
| D. Do nonattainment permitting requirements apply to this application? | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |
| E. Do prevention of significant deterioration permitting requirements apply to this application? | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO |
| F. Do Hazardous Air Pollutant Major Source [FCAA 112(g)] requirements apply to this application? | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |
| G. Is a Plant-wide Applicability Limit permit being requested? | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |
| X. Professional Engineer (P.E.) Seal | |
| Is the estimated capital cost of the project greater than \$2 million dollars? | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO |
| If Yes, submit the application under the seal of a Texas licensed P.E. | |
| XI. Permit Fee Information | |
| Check, Money Order, Transaction Number ,ePay Voucher Number: N/A | Fee Amount: N/A |
| Company name on check: Tenaska, Inc. | Paid online?: <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |
| Is a copy of the check or money order attached to the original submittal of this application? | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A |
| Is a Table 30 (Form 10196) entitled, Estimated Capital Cost and Fee Verification, attached? | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A |



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XII. 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 is 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.

XIII. 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. 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, Texas Clean Air Act (TCAA), as amended, or any of the air quality rules and regulations 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: Nicholas Borman, Sr Vice President, Engineering and Construction

Signature: _____

N Borman

Original Signature Required

Date: _____

March 4, 2014

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Important Note: The agency **requires** that a Core Data Form be submitted on all incoming applications unless a Regulated Entity and Customer Reference Number have been issued *and* no core data information has changed. For more information regarding the Core Data Form, call (512) 239-5175 or go to www.tceq.texas.gov/permitting/central_registry/guidance.html.

| | | | |
|--|-----------------------|---|---|
| I. Applicant Information | | | |
| A. Company or Other Legal Name: Tenaska Roan's Prairie Partners, LLC | | | |
| Texas Secretary of State Charter/Registration Number (<i>if applicable</i>): | | | |
| B. Company Official Contact Name: Mr. Greg Kunkel | | | |
| Title: Vice President, Environmental Affairs | | | |
| Mailing Address: 1044 N. 115 th Street, Suite 400 | | | |
| City: Omaha | | State: NE | ZIP Code: 68154-4446 |
| Telephone No.: 402-691-9500 | Fax No.: 402-691-9530 | E-mail Address: gkunkel@tenaska.com | |
| C. Technical Contact Name: Mr. Larry Carlson | | | |
| Title: Director, Air Programs | | | |
| Company Name: Tenaska, Inc. | | | |
| Mailing Address: 1044 N. 115 th Street, Suite 400 | | | |
| City: Omaha | | State: NE | ZIP Code: 68154-4446 |
| Telephone No.: 402-938-1661 | Fax No.: 402-691-9530 | E-mail Address: lcarlson@tenaska.com | |
| D. Site Name: Tenaska Roan's Prairie Generating Station | | | |
| E. Area Name/Type of Facility: Electric Generating Station | | | <input checked="" type="checkbox"/> Permanent <input type="checkbox"/> Portable |
| F. Principal Company Product or Business: Electricity Generation | | | |
| Principal Standard Industrial Classification Code (SIC): 4911 | | | |
| Principal North American Industry Classification System (NAICS): 221112 | | | |
| G. Projected Start of Construction Date: January 2015 | | | |
| Projected Start of Operation Date: June 2016 | | | |
| H. Facility and Site Location Information (If no street address, provide clear driving directions to the site in writing.): | | | |
| From College Station, Texas, head northeast on Farm to Market Rd 60/University Dr. toward Jane St. Turn right onto TX-6 Frontage S. Turn left onto Harvey Rd. Slight right onto TX-30 E. Site is approximately 22.4 miles down TX-30 E on the right hand side. | | | |
| City/Town: Shiro | | County: Grimes | ZIP Code: 77873 |
| Latitude (nearest second): 30° 35' 16" N | | Longitude (nearest second): 95° 55' 38" W | |

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| I. Applicant Information (continued) | |
| I. Account Identification Number (leave blank if new site or facility): | |
| J. Core Data Form. | |
| Is the Core Data Form (Form 10400) attached? If <i>No</i> , provide customer reference number and regulated entity number (complete K and L). | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO |
| K. Customer Reference Number (CN): | |
| L. Regulated Entity Number (RN): | |
| II. General Information | |
| A. Is confidential information submitted with this application? If <i>Yes</i> , mark each confidential page confidential in large red letters at the bottom of each page. | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO |
| B. Is this application in response to an investigation or enforcement action? If <i>Yes</i> , attach a copy of any correspondence from the agency. | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |
| C. Number of New Jobs: 0-20 | |
| D. Provide the name of the State Senator and State Representative and district numbers for this facility site: | |
| Senator: Charles Schwertner | District No.: 5 |
| Representative: Lois W. Kolkhorst | District No.: 13 |
| III. Type of Permit Action Requested | |
| A. Mark the appropriate box indicating what type of action is requested. | |
| Initial <input checked="" type="checkbox"/> Amendment <input type="checkbox"/> Revision (30 TAC 116.116(e)) <input type="checkbox"/> Change of Location <input type="checkbox"/> Relocation <input type="checkbox"/> | |
| B. Permit Number (if existing): TBD | |
| C. Permit Type: Mark the appropriate box indicating what type of permit is requested. (<i>check all that apply, skip for change of location</i>) | |
| Construction <input checked="" type="checkbox"/> Flexible <input type="checkbox"/> Multiple Plant <input type="checkbox"/> Nonattainment <input type="checkbox"/> Prevention of Significant Deterioration <input checked="" type="checkbox"/> | |
| Hazardous Air Pollutant Major Source <input type="checkbox"/> Plant-Wide Applicability Limit <input type="checkbox"/> | |
| Other: _____ | |
| D. Is a permit renewal application being submitted in conjunction with this amendment in accordance with 30 TAC 116.315(c). | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |



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| III. Type of Permit Action Requested (continued) | | |
|--|---------|---|
| E. Is this application for a change of location of previously permitted facilities? If Yes, complete III.E.1 - III.E.4. | | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |
| 1. Current Location of Facility (If no street address, provide clear driving directions to the site in writing.): | | |
| Street Address: | | |
| City: | County: | ZIP Code: |
| 2. Proposed Location of Facility (If no street address, provide clear driving directions to the site in writing.): | | |
| Street Address: | | |
| City: | County: | ZIP Code: |
| 3. Will the proposed facility, site, and plot plan meet all current technical requirements of the permit special conditions? If <i>No</i> , attach detailed information. | | <input type="checkbox"/> YES <input type="checkbox"/> NO |
| 4. Is the site where the facility is moving considered a major source of criteria pollutants or HAPs? | | <input type="checkbox"/> YES <input type="checkbox"/> NO |
| F. Consolidation into this Permit: List any standard permits, exemptions or permits by rule to be consolidated into this permit including those for planned maintenance, startup, and shutdown. | | |
| List: | | |
| G. Are you permitting planned maintenance, startup, and shutdown emissions? If <i>Yes</i> , attach information on any changes to emissions under this application as specified in VII and VIII. | | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO |
| H. Federal Operating Permit Requirements (30 TAC Chapter 122 Applicability) | | |
| Is this facility located at a site required to obtain a federal operating permit? If <i>Yes</i> , list all associated permit number(s), attach pages as needed). | | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> To be determined |
| Associated Permit No (s.): TBD | | |
| 1. Identify the requirements of 30 TAC Chapter 122 that will be triggered if this application is approved. | | |
| FOP Significant Revision <input type="checkbox"/> FOP Minor <input type="checkbox"/> Application for an FOP Revision <input type="checkbox"/> To Be Determined <input type="checkbox"/> | | |
| Operational Flexibility/Off-Permit Notification <input type="checkbox"/> Streamlined Revision for GOP <input type="checkbox"/> None <input checked="" type="checkbox"/> | | |



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|---|---|
| III. Type of Permit Action Requested (continued) | |
| H. Federal Operating Permit Requirements (30 TAC Chapter 122 Applicability) (continued) | |
| 2. Identify the type(s) of FOP(s) issued and/or FOP application(s) submitted/pending for the site. (check all that apply) | |
| GOP Issued <input type="checkbox"/> | GOP application/revision application submitted or under APD review <input type="checkbox"/> |
| SOP Issued <input type="checkbox"/> | SOP application/revision application submitted or under APD review <input type="checkbox"/> |
| IV. Public Notice Applicability | |
| A. Is this a new permit application or a change of location application? | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO |
| B. Is this application for a concrete batch plant? If Yes, complete V.C.1 – V.C.2. | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |
| C. Is this an application for a major modification of a PSD, nonattainment, FCAA 112(g) permit, or exceedance of a PAL permit? | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |
| D. Is this application for a PSD or major modification of a PSD located within 100 kilometers or less of an affected state or Class I Area? | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |
| If Yes, list the affected state(s) and/or Class I Area(s). | |
| E. Is this a state permit amendment application? If Yes, complete IV.E.1. – IV.E.3. --- NO | |
| 1. Is there any change in character of emissions in this application? | <input type="checkbox"/> YES <input type="checkbox"/> NO |
| 2. Is there a new air contaminant in this application? | <input type="checkbox"/> YES <input type="checkbox"/> NO |
| 3. Do the facilities handle, load, unload, dry, manufacture, or process grain, seed, legumes, or vegetables fibers (agricultural facilities)? | <input type="checkbox"/> YES <input type="checkbox"/> NO |
| F. List the total annual emission increases associated with the application (<i>list all that apply and attach additional sheets as needed</i>): | |
| Volatile Organic Compounds (VOC): 72.56 tpy | |
| Sulfur Dioxide (SO ₂): 15.44 tpy | |
| Carbon Monoxide (CO): 513.06 tpy | |
| Nitrogen Oxides (NO _x): 372.39 tpy | |
| Particulate Matter (PM): 47.95 tpy | |
| PM ₁₀ microns or less (PM ₁₀): 47.95 tpy | |
| PM _{2.5} microns or less (PM _{2.5}): 47.95 tpy | |
| Sulfuric Acid Mist (H ₂ SO ₄): 2.67 tpy | |
| Lead (Pb): 0.046 tpy | |
| Hazardous Air Pollutants (HAPs): 7.02 tpy | |
| Other speciated air contaminants not listed above: CO ₂ = 1,278,052 tpy, CO _{2e} = 1,279,629 tpy | |



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| | | |
|--|----------------|---|
| V. Public Notice Information (complete if applicable) | | |
| A. Public Notice Contact Name: Ms. Christie Couvillion | | |
| Title: Sr. Environmental Specialist | | |
| Mailing Address: 1044 N. 115 th Street, Suite 400 | | |
| City: Omaha | State: NE | ZIP Code: 68154-4446 |
| Telephone No.: 402-691-9500 | | |
| B. Name of the Public Place: Navasota Public Library | | |
| Physical Address (No P.O. Boxes): 1411 E. Washington Ave. | | |
| City: Navasota | County: Grimes | ZIP Code: 77868 |
| The public place has granted authorization to place the application for public viewing and copying. | | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO |
| The public place has internet access available for the public. | | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO |
| C. Concrete Batch Plants, PSD, and Nonattainment Permits | | |
| 1. County Judge Information (For Concrete Batch Plants and PSD and/or Nonattainment Permits) for this facility site. | | |
| The Honorable: Betty Shiflett | | |
| Mailing Address: P.O. Box 160 | | |
| City: Anderson | State: Texas | ZIP Code: 77830 |
| 2. Is the facility located in a municipality or an extraterritorial jurisdiction of a municipality? (For Concrete Batch Plants) | | <input type="checkbox"/> YES <input type="checkbox"/> NO |
| Presiding Officers Name(s): N/A | | |
| Title: | | |
| Mailing Address: | | |
| City: | State: | ZIP Code: |
| 3. Provide the name, mailing address of the chief executive of the city for the location where the facility is or will be located. | | |
| Chief Executive: Mayor Gail Sowell | | |
| Mailing Address: P.O. Box 592 | | |
| City: Anderson | State: Texas | ZIP Code: 77830 |



**Texas Commission on Environmental Quality
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Air Preconstruction Permit and Amendment**

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| | | |
|---|---|-----------|
| V. Public Notice Information (complete if applicable) (continued) | | |
| 3. Provide the name, mailing address of the Indian Governing Body for the location where the facility is or will be located. <i>(continued)</i> | | |
| Name of the Indian Governing Body: N/A | | |
| Title: | | |
| Mailing Address: | | |
| City: | State: | ZIP Code: |
| D. Bilingual Notice | | |
| Is a bilingual program required by the Texas Education Code in the School District? | <input checked="" type="checkbox"/> YES <input type="checkbox"/> 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? | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO | |
| If <i>Yes</i> , list which languages are required by the bilingual program? | | |
| Spanish | | |
| VI. Small Business Classification (Required) | | |
| A. Does this company (including parent companies and subsidiary companies) have fewer than 100 employees or less than \$6 million in annual gross receipts? | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO | |
| B. Is the site a major stationary source for federal air quality permitting? | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO | |
| C. Are the site emissions of any regulated air pollutant greater than or equal to 50 tpy? | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO | |
| D. Are the site emissions of all regulated air pollutants combined less than 75 tpy? | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO | |
| VII. Technical Information | | |
| A. The following information must be submitted with your Form PI-1 (this is just a checklist to make sure you have included everything) | | |
| 1. Current Area Map <input checked="" type="checkbox"/> | | |
| 2. Plot Plan <input checked="" type="checkbox"/> | | |
| 3. Existing Authorizations <input checked="" type="checkbox"/> | | |
| 4. Process Flow Diagram <input checked="" type="checkbox"/> | | |
| 5. Process Description <input checked="" type="checkbox"/> | | |
| 6. Maximum Emissions Data and Calculations <input checked="" type="checkbox"/> | | |
| 7. Air Permit Application Tables <input checked="" type="checkbox"/> | | |
| a. Table 1(a) (Form 10153) entitled, Emission Point Summary <input checked="" type="checkbox"/> | | |
| b. Table 2 (Form 10155) entitled, Material Balance <input checked="" type="checkbox"/> | | |
| c. Other equipment, process or control device tables <input checked="" type="checkbox"/> | | |



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| | | | |
|---|-------------|-------------|---|
| VII. Technical Information | | | |
| B. Are any schools located within 3,000 feet of this facility? | | | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |
| C. Maximum Operating Schedule: | | | |
| Hours: 24 | Day(s): 365 | Week(s): 52 | Year(s): 2,920 hrs/yr |
| Seasonal Operation? If Yes, please describe in the space provide below. | | | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |
| | | | |
| D. Have the planned MSS emissions been previously submitted as part of an emissions inventory? | | | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |
| Provide a list of each planned MSS facility or related activity and indicate which years the MSS activities have been included in the emissions inventories. Attach pages as needed. | | | |
| | | | |
| E. Does this application involve any air contaminants for which a <i>disaster review</i> is required? | | | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |
| F. Does this application include a pollutant of concern on the <i>Air Pollutant Watch List (APWL)</i> ? | | | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |
| VIII. State Regulatory Requirements | | | |
| Applicants must demonstrate compliance with all applicable state regulations to obtain a permit or amendment. <i>The application must contain detailed attachments addressing applicability or non applicability; identify state regulations; show how requirements are met; and include compliance demonstrations.</i> | | | |
| A. Will the emissions from the proposed facility protect public health and welfare, and comply with all rules and regulations of the TCEQ? | | | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO |
| B. Will emissions of significant air contaminants from the facility be measured? | | | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO |
| C. Is the Best Available Control Technology (BACT) demonstration attached? | | | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO |
| D. Will the proposed facilities achieve the performance represented in the permit application as demonstrated through recordkeeping, monitoring, stack testing, or other applicable methods? | | | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO |
| IX. Federal Regulatory Requirements | | | |
| Applicants must demonstrate compliance with all applicable federal regulations to obtain a permit or amendment <i>The application must contain detailed attachments addressing applicability or non applicability; identify federal regulation subparts; show how requirements are met; and include compliance demonstrations.</i> | | | |
| A. Does Title 40 Code of Federal Regulations Part 60, (40 CFR Part 60) New Source Performance Standard (NSPS) apply to a facility in this application? | | | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO |
| B. Does 40 CFR Part 61, National Emissions Standard for Hazardous Air Pollutants (NESHAP) apply to a facility in this application? | | | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |
| C. Does 40 CFR Part 63, Maximum Achievable Control Technology (MACT) standard apply to a facility in this application? | | | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO |



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XII. 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 is 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.

XIII. 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. 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, Texas Clean Air Act (TCAA), as amended, or any of the air quality rules and regulations 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: Nicholas Borman, Sr Vice President, Engineering and Construction

Signature: _____

N Borman

Original Signature Required

Date: _____

March 4, 2014

US EPA ARCHIVE DOCUMENT



**Texas Commission on Environmental Quality
Form PI-1 General Application for
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XII. Delinquent Fees and Penalties

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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, Texas Clean Air Act (TCAA), as amended, or any of the air quality rules and regulations 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: _____
Nicholas Borman, Sr Vice President, Engineering and Construction

Signature: _____
Original Signature Required

Date: _____

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**TABLE 31
COMBUSTION TURBINES**

| TURBINE DATA | |
|---|--|
| Emission Point Numbers From Table 1(a) : <u>1, 2, 3</u> | |
| <p align="center">APPLICATION</p> <p><input checked="" type="checkbox"/> Electric Generation <input type="checkbox"/> Base Load <input checked="" type="checkbox"/> Peaking <input type="checkbox"/> Gas Compression <input type="checkbox"/> Other (Specify) _____</p> | <p align="center">CYCLE</p> <p><input checked="" type="checkbox"/> Simple Cycle <input type="checkbox"/> Regenerative Cycles <input type="checkbox"/> Cogeneration <input type="checkbox"/> Combined Cycle</p> |
| Manufacturer <u>GE</u> Model No. <u>7FA-04</u> Serial No. <u>TBD</u> | Model represented is based on: <input checked="" type="checkbox"/> Preliminary Design <input type="checkbox"/> Contract Award <input type="checkbox"/> Other (specify) _____ |
| Manufacturer's Rated Output at Baseload, ISO <u>207 MW</u> (MW)(hp) | |
| Proposed Site Operating Range <u>93.2-207 MW</u> (MW)(hp) | |
| Manufacturer's Rated Heat Rate at Baseload, ISO <u>9,833</u> (Btu (HHV)/k W-hr) | |

| FUEL DATA | | |
|--|----------------------|-----------------------------|
| Primary Fuels: | | |
| <input checked="" type="checkbox"/> Natural Gas | _____ Process Offgas | _____ Landfill/Digester Gas |
| _____ Fuel Oil | _____ Refinery Gas | _____ Other |
| Backup Fuels | | |
| <input checked="" type="checkbox"/> Not Provided | _____ Process Offgas | _____ Ethane |
| _____ Fuel Oil | _____ Refinery Gas | _____ Other (specify) _____ |
| Attach fuel analyses, including maximum sulfur content, heating value (specify LHV or HHV) and mole percent of gaseous constituents. | | |

| EMISSIONS DATA |
|--|
| Attach manufacturer's information showing emissions of NO _x , CO, VOC and PM for each proposed fuel at turbine loads and site ambient temperatures representative of the range of proposed operation. The information must be sufficient to determine maximum hourly and annual emission rates. Annual emissions may be based on a conservatively low approximation of site annual average temperature. Provide emissions in pounds per hour and except for PM, parts per million by volume at actual conditions and corrected to dry, 15% oxygen conditions. |
| Method of Emission Control: <input checked="" type="checkbox"/> Lean Premix Combustors <input type="checkbox"/> Oxidation Catalyst <input type="checkbox"/> Water Injection <input type="checkbox"/> Other(specify) <input type="checkbox"/> Other Low-NO _x Combustion <input type="checkbox"/> SCR Catalyst <input type="checkbox"/> Steam Injection |
| <u>See report text for details on emissions data.</u> |

| ADDITIONAL INFORMATION |
|--|
| <p align="center"><i>On separate sheets attach the following:</i></p> <p>A. Details regarding principle of operation of emission controls. If add-on equipment is used, provide make and model and manufacturer's information. Example details include: controller input variables and operational algorithms for water or ammonia injection systems, combustion mode versus turbine load for variable mode combustors, etc.</p> <p>B. Exhaust parameter information on Table 1(a).</p> <p>C. If fired duct burners are used, information required on Table 6.</p> |

**TABLE 31
COMBUSTION TURBINES**

| TURBINE DATA | |
|---|--|
| Emission Point Numbers From Table 1(a) : <u>1, 2, 3</u> | |
| <p align="center">APPLICATION</p> <p><input checked="" type="checkbox"/> Electric Generation <input type="checkbox"/> Base Load <input checked="" type="checkbox"/> Peaking <input type="checkbox"/> Gas Compression <input type="checkbox"/> Other (Specify) _____</p> | <p align="center">CYCLE</p> <p><input checked="" type="checkbox"/> Simple Cycle <input type="checkbox"/> Regenerative Cycles <input type="checkbox"/> Cogeneration <input type="checkbox"/> Combined Cycle</p> |
| Manufacturer <u>GE</u> Model No. <u>7FA-05</u> Serial No. <u>TBD</u> | Model represented is based on: <input checked="" type="checkbox"/> Preliminary Design <input type="checkbox"/> Contract Award <input type="checkbox"/> Other (specify) _____ |
| Manufacturer's Rated Output at Baseload, ISO <u>227.6 MW</u> (MW)(hp) | |
| Proposed Site Operating Range <u>91.5-227.6 MW</u> (MW)(hp) | |
| Manufacturer's Rated Heat Rate at Baseload, ISO <u>9,672</u> (Btu (HHV)/k W-hr) | |

| FUEL DATA | | |
|--|----------------------|-----------------------------|
| Primary Fuels: | | |
| <input checked="" type="checkbox"/> Natural Gas | _____ Process Offgas | _____ Landfill/Digester Gas |
| _____ Fuel Oil | _____ Refinery Gas | _____ Other |
| Backup Fuels | | |
| <input checked="" type="checkbox"/> Not Provided | _____ Process Offgas | _____ Ethane |
| _____ Fuel Oil | _____ Refinery Gas | _____ Other (specify) _____ |
| Attach fuel analyses, including maximum sulfur content, heating value (specify LHV or HHV) and mole percent of gaseous constituents. | | |

| EMISSIONS DATA |
|--|
| Attach manufacturer's information showing emissions of NO _x , CO, VOC and PM for each proposed fuel at turbine loads and site ambient temperatures representative of the range of proposed operation. The information must be sufficient to determine maximum hourly and annual emission rates. Annual emissions may be based on a conservatively low approximation of site annual average temperature. Provide emissions in pounds per hour and except for PM, parts per million by volume at actual conditions and corrected to dry, 15% oxygen conditions. |
| Method of Emission Control: <input checked="" type="checkbox"/> Lean Premix Combustors <input type="checkbox"/> Oxidation Catalyst <input type="checkbox"/> Water Injection <input type="checkbox"/> Other(specify) <input type="checkbox"/> Other Low-NO _x Combustion <input type="checkbox"/> SCR Catalyst <input type="checkbox"/> Steam Injection |
| <u>See report text for details on emissions data.</u> |

| ADDITIONAL INFORMATION |
|---|
| <i>On separate sheets attach the following:</i> |
| A. Details regarding principle of operation of emission controls. If add-on equipment is used, provide make and model and manufacturer's information. Example details include: controller input variables and operational algorithms for water or ammonia injection systems, combustion mode versus turbine load for variable mode combustors, etc. |
| B. Exhaust parameter information on Table 1(a). |
| C. If fired duct burners are used, information required on Table 6. |

**TABLE 31
COMBUSTION TURBINES**

| TURBINE DATA | |
|---|--|
| Emission Point Number From Table 1(a) : <u>1, 2, 3</u> | |
| <p align="center">APPLICATION</p> <p><input checked="" type="checkbox"/> Electric Generation <input type="checkbox"/> Base Load <input checked="" type="checkbox"/> Peaking <input type="checkbox"/> Gas Compression <input type="checkbox"/> Other (Specify) _____</p> | <p align="center">CYCLE</p> <p><input checked="" type="checkbox"/> Simple Cycle <input type="checkbox"/> Regenerative Cycles <input type="checkbox"/> Cogeneration <input type="checkbox"/> Combined Cycle</p> |
| Manufacturer <u>Siemens</u> Model No. <u>SGT6-5000F(5)ee</u> Serial No. <u>TBD</u> | Model represented is based on: <input checked="" type="checkbox"/> Preliminary Design <input type="checkbox"/> Contract Award <input type="checkbox"/> Other (specify) _____ |
| Manufacturer's Rated Output at Baseload, ISO <u>231.2 MW</u> (MW)(hp) | |
| Proposed Site Operating Range <u>93.0-231.2 MW</u> (MW)(hp) | |
| Manufacturer's Rated Heat Rate at Baseload, ISO <u>9,778</u> (Btu (HHV)/k W-hr) | |

| FUEL DATA | | |
|--|---|--|
| Primary Fuels: | | |
| <input checked="" type="checkbox"/> Natural Gas | <input type="checkbox"/> Process Offgas | <input type="checkbox"/> Landfill/Digester Gas |
| <input type="checkbox"/> Fuel Oil | <input type="checkbox"/> Refinery Gas | <input type="checkbox"/> Other |
| Backup Fuels | | |
| <input checked="" type="checkbox"/> Not Provided | <input type="checkbox"/> Process Offgas | <input type="checkbox"/> Ethane |
| <input type="checkbox"/> Fuel Oil | <input type="checkbox"/> Refinery Gas | <input type="checkbox"/> Other (specify) _____ |
| Attach fuel analyses, including maximum sulfur content, heating value (specify LHV or HHV) and mole percent of gaseous constituents. | | |

| EMISSIONS DATA |
|--|
| Attach manufacturer's information showing emissions of NO _x , CO, VOC and PM for each proposed fuel at turbine loads and site ambient temperatures representative of the range of proposed operation. The information must be sufficient to determine maximum hourly and annual emission rates. Annual emissions may be based on a conservatively low approximation of site annual average temperature. Provide emissions in pounds per hour and except for PM, parts per million by volume at actual conditions and corrected to dry, 15% oxygen conditions. |
| Method of Emission Control: <input checked="" type="checkbox"/> Lean Premix Combustors <input type="checkbox"/> Oxidation Catalyst <input type="checkbox"/> Water Injection <input type="checkbox"/> Other(specify) <input type="checkbox"/> Other Low-NO _x Combustion <input type="checkbox"/> SCR Catalyst <input type="checkbox"/> Steam Injection |
| <u>See report text for details on emissions data.</u> |

| ADDITIONAL INFORMATION |
|---|
| <i>On separate sheets attach the following:</i> |
| A. Details regarding principle of operation of emission controls. If add-on equipment is used, provide make and model and manufacturer's information. Example details include: controller input variables and operational algorithms for water or ammonia injection systems, combustion mode versus turbine load for variable mode combustors, etc. |
| B. Exhaust parameter information on Table 1(a). |
| C. If fired duct burners are used, information required on Table 6. |

TABLE 2

MATERIAL BALANCE

This material balance table is used to quantify possible emissions of air contaminants and special emphasis should be placed on potential air contaminants, for example: If feed contains sulfur, show distribution to all products. Please relate each material (or group of materials) listed to its respective location in the process flow diagram by assigning point numbers (taken from the flow diagram) to each materials.

| LIST EVERY MATERIAL INVOLVED IN EACH OF THE FOLLOWING GROUPS | Point No. from Flow Diagram | Process Rate (lbs/hr or SCFM) standard conditions: 70°F 14.7 PSIA. Check appropriate column at right for each process. | Measurement | Estimation | Calculation |
|---|-----------------------------|--|-------------|------------|-------------|
| | | | | | |
| 1. Raw Materials - Input N/A | | | | | |
| 2. Fuels - Input Turbines - Natural Gas Emergency Engine, Fire Pump - Ultra low-sulfur diesel | | Turbines = 2,198 MMBtu/hr per turbine Emergency Engine: 19.17 MMBtu/hr Fire Pump: 4.02 MMBtu/hr | | X | |
| 3. Products & By-Products - Output Electricity | | Electricity = 207 MW per turbine | | | |
| 4. Solid Wastes - Output N/A | | | | | |
| 5. Liquid Wastes - Output N/A | | | | | |
| 6. Airborne Waste (Solid) - Output Three new turbines, one new emergency generator, one new fire pump: PM PM ₁₀ PM _{2.5} | 1, 2, 3, EMGEN, FWPUMP | See Table 1(a). | | | X |
| 7. Airborne Wastes (Gaseous) - Output Three new turbines, one new emergency generator, one new fire pump: NO _x CO VOC SO ₂ H ₂ SO ₄ CO ₂ CO ₂ e | 1, 2, 3, EMGEN, FWPUMP | See Table 1(a). | | | X |

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TABLE 2 - Material Balance GE 04.doc

TABLE 2

MATERIAL BALANCE

This material balance table is used to quantify possible emissions of air contaminants and special emphasis should be placed on potential air contaminants, for example: If feed contains sulfur, show distribution to all products. Please relate each material (or group of materials) listed to its respective location in the process flow diagram by assigning point numbers (taken from the flow diagram) to each materials.

| LIST EVERY MATERIAL INVOLVED IN EACH OF THE FOLLOWING GROUPS | Point No. from Flow Diagram | Process Rate (lbs/hr or SCFM) standard conditions: 70°F 14.7 PSIA. Check appropriate column at right for each process. | Measurement | Estimation | Calculation |
|---|-----------------------------|--|-------------|------------|-------------|
| | | | | | |
| 1. Raw Materials - Input N/A | | | | | |
| 2. Fuels - Input Turbines - Natural Gas Emergency Engine, Fire Pump - Ultra low-sulfur diesel | | Turbines = 2,378 MMBtu/hr per turbine Emergency Engine: 19.17 MMBtu/hr Fire Pump: 4.02 MMBtu/hr | | X | |
| 3. Products & By-Products - Output Electricity | | Electricity = 227.6 MW per turbine | | | |
| 4. Solid Wastes - Output N/A | | | | | |
| 5. Liquid Wastes - Output N/A | | | | | |
| 6. Airborne Waste (Solid) - Output Three new turbines, one new emergency generator, one new fire pump: PM PM ₁₀ PM _{2.5} | 1, 2, 3, EMGEN, FWPUMP | See Table 1(a). | | | X |
| 7. Airborne Wastes (Gaseous) - Output Three new turbines, one new emergency generator, one new fire pump: NO _x CO VOC SO ₂ H ₂ SO ₄ CO ₂ CO ₂ e | 1, 2, 3, EMGEN, FWPUMP | See Table 1(a). | | | X |

10/93

TABLE 2 - Material Balance GE 05.doc

TABLE 2

MATERIAL BALANCE

This material balance table is used to quantify possible emissions of air contaminants and special emphasis should be placed on potential air contaminants, for example: If feed contains sulfur, show distribution to all products. Please relate each material (or group of materials) listed to its respective location in the process flow diagram by assigning point numbers (taken from the flow diagram) to each materials.

| LIST EVERY MATERIAL INVOLVED IN EACH OF THE FOLLOWING GROUPS | Point No. from Flow Diagram | Process Rate (lbs/hr or SCFM) standard conditions: 70°F 14.7 PSIA. Check appropriate column at right for each process. | Measurement | Estimation | Calculation |
|---|-----------------------------|--|-------------|------------|-------------|
| | | | | | |
| 1. Raw Materials - Input N/A | | | | | |
| 2. Fuels - Input Turbines - Natural Gas Emergency Engine, Fire Pump - Ultra low-sulfur diesel | | Turbines = 2,441 MMBtu/hr per turbine Emergency Engine: 19.17 MMBtu/hr Fire Pump: 4.02 MMBtu/hr | | X | |
| 3. Products & By-Products - Output Electricity | | Electricity = 231.2 MW per turbine | | | |
| 4. Solid Wastes - Output N/A | | | | | |
| 5. Liquid Wastes - Output N/A | | | | | |
| 6. Airborne Waste (Solid) - Output Three new turbines, one new emergency generator, one new fire pump: PM PM ₁₀ PM _{2.5} | 1, 2, 3, EMGEN, FWPUMP | See Table 1(a). | | | X |
| 7. Airborne Wastes (Gaseous) - Output Three new turbines, one new emergency generator, one new fire pump: NO _x CO VOC SO ₂ H ₂ SO ₄ CO ₂ CO ₂ e | 1, 2, 3, EMGEN, FWPUMP | See Table 1(a). | | | X |

10/93

TABLE 2 - Material Balance Siemens.doc

| I. Engine Data | | | | | | | | | | | |
|---|------|---------|-------------------------------------|-----------------------------------|------|--------------------------------------|------|-----------------------|--------------------------------------|--|------|
| Manufacturer: Caterpillar or Other | | | Model No. 3516C ATAAC or Similar | | | Serial No. TBD | | | Manufacture Date: New (post 2013) | | |
| Rebuilds Date: N/A | | | No. of Cylinders: 16 | | | Compression Ratio: 14.7:1 | | | EPN: EMGEN | | |
| Application: <input type="checkbox"/> Gas Compression <input type="checkbox"/> Electric Generation <input type="checkbox"/> Refrigeration <input checked="" type="checkbox"/> Emergency/Stand by | | | | | | | | | | | |
| <input checked="" type="checkbox"/> 4 Stroke Cycle <input type="checkbox"/> 2 Stroke Cycle <input type="checkbox"/> Carbureted <input type="checkbox"/> Spark Ignited <input type="checkbox"/> Dual Fuel <input type="checkbox"/> Fuel Injected | | | | | | | | | | | |
| <input checked="" type="checkbox"/> Diesel <input type="checkbox"/> Naturally Aspirated <input type="checkbox"/> Blower /Pump Scavenged <input type="checkbox"/> Turbo Charged and I.C. <input checked="" type="checkbox"/> Turbo Charged | | | | | | | | | | | |
| <input checked="" type="checkbox"/> Intercooled <input type="checkbox"/> I.C. Water Temperature <input type="checkbox"/> Lean Burn <input type="checkbox"/> Rich Burn | | | | | | | | | | | |
| Ignition/Injection Timing: Fixed: TBD | | | | | | Variable: TBD | | | | | |
| Manufacture Horsepower Rating: 2,937 hp | | | | | | Proposed Horsepower Rating: 2,937 hp | | | | | |
| Discharge Parameters | | | | | | | | | | | |
| Stack Height (Feet) | | | Stack Diameter (Feet) | | | Stack Temperature (°F) | | | Exit Velocity (FPS) | | |
| 14.0 | | | 1.0 | | | 768 | | | 323.4 | | |
| II. Fuel Data | | | | | | | | | | | |
| Type of Fuel: <input type="checkbox"/> Field Gas <input type="checkbox"/> Landfill Gas <input type="checkbox"/> LP Gas <input type="checkbox"/> Natural Gas <input type="checkbox"/> Digester Gas <input checked="" type="checkbox"/> Diesel | | | | | | | | | | | |
| Fuel Consumption (BTU/bhp-hr): 19.17 MMBTU/hr | | | | Heat Value: 138,000 BTU/gal (HHV) | | | | 124,000 BTU/gal (LHV) | | | |
| Sulfur Content (grains/100 scf - weight %): 1.35 gr/100 dscf | | | | | | | | | | | |
| III. Emission Factors (Before Control) | | | | | | | | | | | |
| NO _x | | CO | | SO ₂ | | VOC | | Formaldehyde | | PM10 | |
| g/hp-hr | ppmv | g/hp-hr | ppmv | g/hp-hr | ppmv | g/hp-hr | ppmv | g/hp-hr | ppmv | g/hp-hr | ppmv |
| 4.8 | | 2.6 | | 0.005 | | 0.32 | | 2.34E-04 | | 0.15 | |
| Source of Emission Factors: <input type="checkbox"/> Manufacturer Data <input checked="" type="checkbox"/> AP-42 <input checked="" type="checkbox"/> Other (specify): EPA Tier 2 Emission Limits, Mass Balance | | | | | | | | | | | |
| IV. Emission Factors (Post Control) | | | | | | | | | | | |
| NO _x | | CO | | SO ₂ | | VOC | | Formaldehyde | | PM10 | |
| g/hp-hr | ppmv | g/hp-hr | ppmv | g/hp-hr | ppmv | g/hp-hr | ppmv | g/hp-hr | ppmv | g/hp-hr | ppmv |
| | | | | | | | | | | | |
| Method of Emission Control: <input type="checkbox"/> NSCR Catalyst <input type="checkbox"/> Lean Operation <input type="checkbox"/> Parameter Adjustment | | | | | | | | | | | |
| <input type="checkbox"/> Stratified Charge <input type="checkbox"/> JLCC Catalyst <input type="checkbox"/> Other (Specify): <u>N/A</u> | | | | | | | | | | | |
| <i>Note: Must submit a copy of any manufacturer control information that demonstrates control efficiency.</i> | | | | | | | | | | | |
| Is Formaldehyde included in the VOCs? <u>N/A</u> | | | | | | | | | | <input type="checkbox"/> Yes <input type="checkbox"/> No | |
| V. Federal and State Standards (Check all that apply) | | | | | | | | | | | |
| <input type="checkbox"/> NSPS JJJ <input checked="" type="checkbox"/> MACT ZZZZ <input checked="" type="checkbox"/> NSPS IIII <input type="checkbox"/> Title 30 Chapter 117 - List County: _____ | | | | | | | | | | | |
| 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). | | | | | | | | | | | |



**Texas Commission on Environmental Quality
Table 29 Reciprocating Engines**

US EPA ARCHIVE DOCUMENT

| | | | | | | | | | | | | | | | |
|---|-------------|----------------|--|-----------------------------------|-------------|------------------------------------|---------------|---------------------|--------------------------------------|--|-------------|-------|--|--|--|
| I. Engine Data | | | | | | | | | | | | | | | |
| Manufacturer: Cummins or Other | | | Model No. CFP Engine Model or Similar | | | Serial No. TBD | | | Manufacture Date: New (post 2013) | | | | | | |
| Rebuilds Date: N/A | | | No. of Cylinders: 6 | | | Compression Ratio: TBD | | | EPN: FWPUMP | | | | | | |
| Application: <input type="checkbox"/> Gas Compression <input type="checkbox"/> Electric Generation <input type="checkbox"/> Refrigeration <input checked="" type="checkbox"/> Emergency/Stand by | | | | | | | | | | | | | | | |
| <input checked="" type="checkbox"/> 4 Stroke Cycle <input type="checkbox"/> 2 Stroke Cycle <input type="checkbox"/> Carbureted <input type="checkbox"/> Spark Ignited <input type="checkbox"/> Dual Fuel <input type="checkbox"/> Fuel Injected | | | | | | | | | | | | | | | |
| <input checked="" type="checkbox"/> Diesel <input type="checkbox"/> Naturally Aspirated <input type="checkbox"/> Blower /Pump Scavenged <input type="checkbox"/> Turbo Charged and I.C. <input checked="" type="checkbox"/> Turbo Charged | | | | | | | | | | | | | | | |
| <input checked="" type="checkbox"/> Intercooled <input type="checkbox"/> I.C. Water Temperature <input type="checkbox"/> Lean Burn <input type="checkbox"/> Rich Burn | | | | | | | | | | | | | | | |
| Ignition/Injection Timing: | | | Fixed: TBD | | | | Variable: TBD | | | | | | | | |
| Manufacture Horsepower Rating: 575 hp | | | | | | Proposed Horsepower Rating: 575 hp | | | | | | | | | |
| Discharge Parameters | | | | | | | | | | | | | | | |
| Stack Height (Feet) | | | Stack Diameter (Feet) | | | Stack Temperature (°F) | | | Exit Velocity (FPS) | | | | | | |
| 14.0 | | | 1.0 | | | 884 | | | 75.9 | | | | | | |
| II. Fuel Data | | | | | | | | | | | | | | | |
| Type of Fuel: <input type="checkbox"/> Field Gas <input type="checkbox"/> Landfill Gas <input type="checkbox"/> LP Gas <input type="checkbox"/> Natural Gas <input type="checkbox"/> Digester Gas <input checked="" type="checkbox"/> Diesel | | | | | | | | | | | | | | | |
| Fuel Consumption (BTU/bhp-hr): 4.02 MMBTU/hr | | | | Heat Value: 138,000 BTU/gal (HHV) | | | | 124,000 BTU/gal | | | | (LHV) | | | |
| Sulfur Content (grains/100 scf - weight %): 1.35 gr/100 dscf | | | | | | | | | | | | | | | |
| III. Emission Factors (Before Control) | | | | | | | | | | | | | | | |
| NO_x | | CO | | SO₂ | | VOC | | Formaldehyde | | PM10 | | | | | |
| g/hp-hr | ppmv | g/hp-hr | ppmv | g/hp-hr | ppmv | g/hp-hr | ppmv | g/hp-hr | ppmv | g/hp-hr | ppmv | | | | |
| 3.0 | | 3.0 | | 0.005 | | 1.14 | | 3.74E-03 | | 0.15 | | | | | |
| Source of Emission Factors: <input type="checkbox"/> Manufacturer Data <input checked="" type="checkbox"/> AP-42 <input checked="" type="checkbox"/> Other (specify): Table 4 to CI ICE NSPS, Mass Balance | | | | | | | | | | | | | | | |
| IV. Emission Factors (Post Control) | | | | | | | | | | | | | | | |
| NO_x | | CO | | SO₂ | | VOC | | Formaldehyde | | PM10 | | | | | |
| g/hp-hr | ppmv | g/hp-hr | ppmv | g/hp-hr | ppmv | g/hp-hr | ppmv | g/hp-hr | ppmv | g/hp-hr | ppmv | | | | |
| | | | | | | | | | | | | | | | |
| Method of Emission Control: <input type="checkbox"/> NSCR Catalyst <input type="checkbox"/> Lean Operation <input type="checkbox"/> Parameter Adjustment | | | | | | | | | | | | | | | |
| <input type="checkbox"/> Stratified Charge <input type="checkbox"/> JLCC Catalyst <input type="checkbox"/> Other (Specify): <u>N/A</u> | | | | | | | | | | | | | | | |
| <i>Note: Must submit a copy of any manufacturer control information that demonstrates control efficiency.</i> | | | | | | | | | | | | | | | |
| Is Formaldehyde included in the VOCs? N/A | | | | | | | | | | <input type="checkbox"/> Yes <input type="checkbox"/> No | | | | | |
| V. Federal and State Standards (Check all that apply) | | | | | | | | | | | | | | | |
| <input type="checkbox"/> NSPS JJJJ <input checked="" type="checkbox"/> MACT ZZZZ <input checked="" type="checkbox"/> NSPS IIII <input type="checkbox"/> Title 30 Chapter 117 - List County: _____ | | | | | | | | | | | | | | | |
| 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). | | | | | | | | | | | | | | | |

Emission Rate Calculations
Appendix B

March 3, 2014
Project No. 0189555

Environmental Resources Management
CityCentre Four
840 West Sam Houston Parkway North, Suite 600
Houston, Texas 77024-3920
(281) 600-1000



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Table 1(a) Emission Point Summary

| | | | | | |
|------------|---|-------------|-----|-------------------------|-------------|
| Date: | 3/4/2014 | Permit No.: | TBD | Regulated Entity No.: | TBD |
| Area Name: | Tenaska Roan's Prairie Generating Station | | | Customer Reference No.: | CN600698948 |

Review of applications and issuance of permits will be expedited by supplying all necessary information requested on this Table.

| AIR CONTAMINANT DATA | | | | | |
|----------------------|---------|--|--------------------------------------|----------------------------------|------------|
| 1. Emission Point | | | 2. Component or Air Contaminant Name | 3. Air Contaminant Emission Rate | |
| (A) EPN | (B) FIN | (C) NAME | | (A) POUND | (B) TPY |
| 1 | 1 | Unit 1 (Siemens SGT6-5000F(5ee) Turbine) | NO _x | 3.00 | 4.38 |
| | | | NO _x (MSS) | 109.85 | 19.73 |
| | | | CO | 3.45 | 5.04 |
| | | | CO (MSS) | 3.45 | 0.11 |
| | | | VOC | 10.00 | 14.60 |
| | | | VOC (MSS) | 13.23 | 1.35 |
| | | | SO ₂ | <0.01 | 14.60 |
| | | | PM | <0.01 | 14.60 |
| | | | PM ₁₀ | <0.01 | 0.89 |
| | | | PM _{2.5} | <0.01 | 0.02 |
| | | | H ₂ SO ₄ | 291,749.39 | 425,954.12 |
| | | | Pb | 5.38 | 7.86 |
| | | | HAP (excluding Pb) | 2.86 | 4.17 |
| | | | Formaldehyde | 0.10 | 0.14 |
| | | | CO ₂ | 0.54 | 0.79 |
| | | | CH ₄ | 292,044.27 | 426,384.63 |
| | | | N ₂ O | <0.01 | <0.01 |
| CO ₂ e | <0.01 | <0.01 | | | |

US EPA ARCHIVE DOCUMENT



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Table 1(a) Emission Point Summary

| | | | | | |
|------------|---|-------------|-----|-------------------------|-------------|
| Date: | 3/4/2014 | Permit No.: | TBD | Regulated Entity No.: | TBD |
| Area Name: | Tenaska Roan's Prairie Generating Station | | | Customer Reference No.: | CN600698948 |

Review of applications and issuance of permits will be expedited by supplying all necessary information requested on this Table.

| AIR CONTAMINANT DATA | | | | | |
|----------------------|---------|--|--------------------------------------|----------------------------------|------------|
| 1. Emission Point | | | 2. Component or Air Contaminant Name | 3. Air Contaminant Emission Rate | |
| (A) EPN | (B) FIN | (C) NAME | | (A) POUND | (B) TPY |
| 2 | 2 | Unit 2 (Siemens SGT6-5000F(5ee) Turbine) | NO _x | 3.00 | 4.38 |
| | | | NO _x (MSS) | 109.85 | 19.73 |
| | | | CO | 3.45 | 5.04 |
| | | | CO (MSS) | 3.45 | 0.11 |
| | | | VOC | 10.00 | 14.60 |
| | | | VOC (MSS) | 13.23 | 1.35 |
| | | | SO ₂ | <0.01 | 14.60 |
| | | | PM | <0.01 | 14.60 |
| | | | PM ₁₀ | <0.01 | 0.89 |
| | | | PM _{2.5} | <0.01 | 0.02 |
| | | | H ₂ SO ₄ | 291,749.39 | 425,954.12 |
| | | | Pb | 5.38 | 7.86 |
| | | | HAP (excluding Pb) | 2.86 | 4.17 |
| | | | Formaldehyde | 0.10 | 0.14 |
| | | | CO ₂ | 0.54 | 0.79 |
| | | | CH ₄ | 292,044.27 | 426,384.63 |
| | | | N ₂ O | <0.01 | <0.01 |
| CO ₂ e | <0.01 | <0.01 | | | |

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TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Table 1(a) Emission Point Summary

| | | | | | |
|------------|---|-------------|-----|-------------------------|-------------|
| Date: | 3/4/2014 | Permit No.: | TBD | Regulated Entity No.: | TBD |
| Area Name: | Tenaska Roan's Prairie Generating Station | | | Customer Reference No.: | CN600698948 |

Review of applications and issuance of permits will be expedited by supplying all necessary information requested on this Table.

| AIR CONTAMINANT DATA | | | | | |
|----------------------|----------|--|--------------------------------------|----------------------------------|------------|
| 1. Emission Point | | | 2. Component or Air Contaminant Name | 3. Air Contaminant Emission Rate | |
| (A) EPN | (B) FIN | (C) NAME | | (A) POUND | (B) TPY |
| 3 | 3 | Unit 3 (Siemens SGT6-5000F(5ee) Turbine) | NO _x | 3.00 | 4.38 |
| | | | NO _x (MSS) | 109.85 | 19.73 |
| | | | CO | 3.45 | 5.04 |
| | | | CO (MSS) | 3.45 | 0.11 |
| | | | VOC | 10.00 | 14.60 |
| | | | VOC (MSS) | 13.23 | 1.35 |
| | | | SO ₂ | <0.01 | 14.60 |
| | | | PM | <0.01 | 14.60 |
| | | | PM ₁₀ | <0.01 | 0.89 |
| | | | PM _{2.5} | <0.01 | 0.02 |
| | | | H ₂ SO ₄ | 291,749.39 | 425,954.12 |
| | | | Pb | 5.38 | 7.86 |
| | | | HAP (excluding Pb) | 2.86 | 4.17 |
| | | | Formaldehyde | 0.10 | 0.14 |
| | | | CO ₂ | 0.54 | 0.79 |
| | | | CH ₄ | 292,044.27 | 426,384.63 |
| N ₂ O | <0.01 | <0.01 | | | |
| CO ₂ e | <0.01 | <0.01 | | | |
| EMGEN | EMGEN | Emergency Generator Engine | NO _x | 30.91 | 1.55 |
| | | | CO | 16.91 | 0.85 |
| | | | VOC | 2.07 | 0.10 |
| | | | SO ₂ | 0.03 | <0.01 |
| | | | PM | 0.97 | 0.05 |
| | | | PM ₁₀ | 0.97 | 0.05 |
| | | | PM _{2.5} | 0.97 | 0.05 |
| | | | H ₂ SO ₄ | <0.01 | <0.01 |
| | | | HAP (excluding Pb) | 0.03 | <0.01 |
| | | | Formaldehyde | <0.01 | <0.01 |
| | | | CO ₂ | 3,125.45 | 156.27 |
| | | | CH ₄ | 0.13 | 0.01 |
| | | | N ₂ O | 0.03 | <0.01 |
| CO ₂ e | 3,136.18 | 156.81 | | | |

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TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Table 1(a) Emission Point Summary

| | | | | | |
|------------|---|-------------|-----|-------------------------|-------------|
| Date: | 3/4/2014 | Permit No.: | TBD | Regulated Entity No.: | TBD |
| Area Name: | Tenaska Roan's Prairie Generating Station | | | Customer Reference No.: | CN600698948 |

Review of applications and issuance of permits will be expedited by supplying all necessary information requested on this Table.

| AIR CONTAMINANT DATA | | | | | |
|----------------------|---------|---------------------------|--------------------------------------|----------------------------------|---------|
| 1. Emission Point | | | 2. Component or Air Contaminant Name | 3. Air Contaminant Emission Rate | |
| (A) EPN | (B) FIN | (C) NAME | | (A) POUND | (B) TPY |
| FWPUMP | FWPUMP | Fire Water Pump | NO _x | 3.78 | 0.19 |
| | | | CO | 3.84 | 0.19 |
| | | | VOC | 1.45 | 0.07 |
| | | | SO ₂ | 0.01 | <0.01 |
| | | | PM | 0.19 | 0.01 |
| | | | PM ₁₀ | 0.19 | 0.01 |
| | | | PM _{2.5} | 0.19 | 0.01 |
| | | | H ₂ SO ₄ | <0.01 | <0.01 |
| | | | HAP (excluding Pb) | 0.02 | <0.01 |
| | | | Formaldehyde | <0.01 | <0.01 |
| | | | CO ₂ | 654.79 | 32.74 |
| | | | CH ₄ | 0.03 | <0.01 |
| | | | N ₂ O | 0.01 | <0.01 |
| | | | CO ₂ e | 657.04 | 32.85 |
| CBFUG | CBFUG | Circuit Breaker Fugitives | SF ₆ | <0.01 | 0.01 |
| | | | CO ₂ e | 45.55 | 199.50 |
| MSSFUG | MSSFUG | Maintenance Activites | NO _x | <0.01 | <0.01 |
| | | | CO | <0.01 | <0.01 |
| | | | VOC | 0.30 | <0.01 |
| | | | PM | 0.20 | 0.04 |
| | | | PM ₁₀ | 0.20 | 0.04 |
| | | | PM _{2.5} | 0.20 | 0.04 |
| | | | HAP (excluding Pb) | 0.30 | <0.01 |
| | | | CO ₂ | 0.92 | 0.01 |
| | | | CH ₄ | 16.70 | 0.11 |
| | | | CO ₂ e | 418.43 | 2.88 |
| FUG | FUG | Fugitives | VOC | 0.01 | 0.06 |
| | | | HAP (excluding Pb) | 0.01 | 0.06 |
| | | | CO ₂ | 0.04 | 0.18 |
| | | | CH ₄ | 0.75 | 3.30 |
| | | | CO ₂ e | 18.87 | 82.65 |

EPN = Emission Point Number
 FIN = Facility Identification Number

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TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Table 1(a) Emission Point Summary

| | | | | | |
|------------|---|-------------|-----|-------------------------|-------------|
| Date: | 3/4/2014 | Permit No.: | TBD | Regulated Entity No.: | TBD |
| Area Name: | Tenaska Roan's Prairie Generating Station | | | Customer Reference No.: | CN600698948 |

Review of applications and issuance of permits will be expedited by supplying all necessary information requested on this Table.

| AIR CONTAMINANT DATA | | | EMISSION POINT DISCHARGE PARAMETERS | | | | | | | | | | | |
|----------------------|------------|--|--------------------------------------|------------------|-------------------|-----------------|-----------------|-----------------------|-----------------------|-------------------------|---------------------|--------------------|---------------------|--|
| 1. Emission Point | | | 4. UTM Coordinates of Emission Point | | | Source | | | | | | | | |
| EPN (A) | FIN (B) | Name (C) | Zone | East (Meters) | North (Meters) | 5. Building | | 6. Height Above | | 7. Stack Exit Data | | | 8. Fugitives | |
| | | | | | | Height (Ft.) | Ground (Ft.) | Diameter (Ft.) (A) | Velocity (FPS) (B) | Temperature (°F) (C) | Length (Ft.) (A) | Width (Ft.) (B) | Axis Degrees (C) | |
| 1 | 1 | Unit 1 (Siemens SGT6-5000F(5ee) Turbine) | 15 | 219,403 | 3,387,566 | 21.0 | 60.0 | 20.0 | 134.7 | 1,059 | -- | -- | -- | |
| 2 | 2 | Unit 2 (Siemens SGT6-5000F(5ee) Turbine) | 15 | 219,420 | 3,387,523 | 21.0 | 60.0 | 20.0 | 134.7 | 1,059 | -- | -- | -- | |
| 3 | 3 | Unit 3 (Siemens SGT6-5000F(5ee) Turbine) | 15 | 219,438 | 3,387,480 | 21.0 | 60.0 | 20.0 | 134.7 | 1,059 | -- | -- | -- | |
| EMGEN | EMGEN | Emergency Generator Engine | 15 | 219,528 | 3,387,595 | 21.0 | 14.0 | 1.0 | 323.4 | 768 | -- | -- | -- | |
| FWPUMP | FWPUMP | Fire Water Pump | 15 | 219,380 | 3,387,593 | 10.5 | 14.0 | 1.0 | 75.9 | 884 | -- | -- | -- | |
| CBFUG | CBFUG | Circuit Breaker Fugitives | 15 | 219,509 | 3,387,556 | -- | 3.0 | -- | -- | -- | 850 | 660 | 77 W | |
| MSSFUG | MSSFUG | Maintenance Activites | 15 | 219,509 | 3,387,556 | -- | 3.0 | -- | -- | -- | 850 | 660 | 77 W | |
| FUG | FUG | Fugitives | 15 | 219,509 | 3,387,556 | -- | 3.0 | -- | -- | -- | 850 | 660 | 77 W | |

EPN = Emission Point Number



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Table 1(a) Emission Point Summary

| | | | | | |
|------------|---|-------------|-----|-------------------------|-------------|
| Date: | 3/4/2014 | Permit No.: | TBD | Regulated Entity No.: | TBD |
| Area Name: | Tenaska Roan's Prairie Generating Station | | | Customer Reference No.: | CN600698948 |

Review of applications and issuance of permits will be expedited by supplying all necessary information requested on this Table.

| AIR CONTAMINANT DATA | | | | | |
|----------------------|------------|----------------------------|--------------------------------------|----------------------------------|------------|
| 1. Emission Point | | | 2. Component or Air Contaminant Name | 3. Air Contaminant Emission Rate | |
| (A) EPN | (B) FIN | (C) NAME | | (A) POUND | (B) TPY |
| 1 | 1 | Unit 1 (GE 7FA.05 Turbine) | NO _x | 86.33 | 110.96 |
| | | | NO _x (MSS) | 86.33 | 11.13 |
| | | | CO | 37.00 | 54.02 |
| | | | CO (MSS) | 801.33 | 143.99 |
| | | | VOC | 3.60 | 5.26 |
| | | | VOC (MSS) | 133.20 | 24.09 |
| | | | SO ₂ | 3.10 | 4.53 |
| | | | PM | 9.90 | 14.82 |
| | | | PM ₁₀ | 9.90 | 14.82 |
| | | | PM _{2.5} | 9.90 | 14.82 |
| | | | H ₂ SO ₄ | 0.32 | 0.47 |
| | | | Pb | 0.01 | 0.02 |
| | | | HAP (excluding Pb) | 1.55 | 2.26 |
| | | | Formaldehyde | 0.81 | 1.18 |
| | | | CO ₂ | 284,119.31 | 414,814.19 |
| | | | CH ₄ | 5.24 | 7.65 |
| | | | N ₂ O | 0.52 | 0.77 |
| CO _{2e} | 284,406.47 | 415,233.44 | | | |

US EPA ARCHIVE DOCUMENT



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Table 1(a) Emission Point Summary

| | | | | | |
|------------|---|-------------|-----|-------------------------|-------------|
| Date: | 3/4/2014 | Permit No.: | TBD | Regulated Entity No.: | TBD |
| Area Name: | Tenaska Roan's Prairie Generating Station | | | Customer Reference No.: | CN600698948 |

Review of applications and issuance of permits will be expedited by supplying all necessary information requested on this Table.

| AIR CONTAMINANT DATA | | | | | |
|----------------------|------------|----------------------------|--------------------------------------|----------------------------------|------------|
| 1. Emission Point | | | 2. Component or Air Contaminant Name | 3. Air Contaminant Emission Rate | |
| (A) EPN | (B) FIN | (C) NAME | | (A) POUND | (B) TPY |
| 2 | 2 | Unit 2 (GE 7FA.05 Turbine) | NO _x | 86.33 | 110.96 |
| | | | NO _x (MSS) | 86.33 | 11.13 |
| | | | CO | 37.00 | 54.02 |
| | | | CO (MSS) | 801.33 | 143.99 |
| | | | VOC | 3.60 | 5.26 |
| | | | VOC (MSS) | 133.20 | 24.09 |
| | | | SO ₂ | 3.10 | 4.53 |
| | | | PM | 9.90 | 14.82 |
| | | | PM ₁₀ | 9.90 | 14.82 |
| | | | PM _{2.5} | 9.90 | 14.82 |
| | | | H ₂ SO ₄ | 0.32 | 0.47 |
| | | | Pb | 0.01 | 0.02 |
| | | | HAP (excluding Pb) | 1.55 | 2.26 |
| | | | Formaldehyde | 0.81 | 1.18 |
| | | | CO ₂ | 284,119.31 | 414,814.19 |
| | | | CH ₄ | 5.24 | 7.65 |
| | | | N ₂ O | 0.52 | 0.77 |
| CO _{2e} | 284,406.47 | 415,233.44 | | | |

US EPA ARCHIVE DOCUMENT



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Table 1(a) Emission Point Summary

| | | | | | |
|------------|---|-------------|-----|-------------------------|-------------|
| Date: | 3/4/2014 | Permit No.: | TBD | Regulated Entity No.: | TBD |
| Area Name: | Tenaska Roan's Prairie Generating Station | | | Customer Reference No.: | CN600698948 |

Review of applications and issuance of permits will be expedited by supplying all necessary information requested on this Table.

| AIR CONTAMINANT DATA | | | | | |
|----------------------|------------|----------------------------|--------------------------------------|----------------------------------|------------|
| 1. Emission Point | | | 2. Component or Air Contaminant Name | 3. Air Contaminant Emission Rate | |
| (A) EPN | (B) FIN | (C) NAME | | (A) POUND | (B) TPY |
| 3 | 3 | Unit 3 (GE 7FA.05 Turbine) | NO _x | 86.33 | 110.96 |
| | | | NO _x (MSS) | 86.33 | 11.13 |
| | | | CO | 37.00 | 54.02 |
| | | | CO (MSS) | 801.33 | 143.99 |
| | | | VOC | 3.60 | 5.26 |
| | | | VOC (MSS) | 133.20 | 24.09 |
| | | | SO ₂ | 3.10 | 4.53 |
| | | | PM | 9.90 | 14.82 |
| | | | PM ₁₀ | 9.90 | 14.82 |
| | | | PM _{2.5} | 9.90 | 14.82 |
| | | | H ₂ SO ₄ | 0.32 | 0.47 |
| | | | Pb | 0.01 | 0.02 |
| | | | HAP (excluding Pb) | 1.55 | 2.26 |
| | | | Formaldehyde | 0.81 | 1.18 |
| | | | CO ₂ | 284,119.31 | 414,814.19 |
| | | | CH ₄ | 5.24 | 7.65 |
| | | | N ₂ O | 0.52 | 0.77 |
| CO _{2e} | 284,406.47 | 415,233.44 | | | |
| EMGEN | EMGEN | Emergency Generator Engine | NO _x | 30.91 | 1.55 |
| | | | CO | 16.91 | 0.85 |
| | | | VOC | 2.07 | 0.10 |
| | | | SO ₂ | 0.03 | <0.01 |
| | | | PM | 0.97 | 0.05 |
| | | | PM ₁₀ | 0.97 | 0.05 |
| | | | PM _{2.5} | 0.97 | 0.05 |
| | | | H ₂ SO ₄ | <0.01 | <0.01 |
| | | | HAP (excluding Pb) | 0.03 | <0.01 |
| | | | Formaldehyde | <0.01 | <0.01 |
| | | | CO ₂ | 3,125.45 | 156.27 |
| | | | CH ₄ | 0.13 | 0.01 |
| | | | N ₂ O | 0.03 | <0.01 |
| | | | CO _{2e} | 3,136.18 | 156.81 |

US EPA ARCHIVE DOCUMENT



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Table 1(a) Emission Point Summary

| | | | | | |
|------------|---|-------------|-----|-------------------------|-------------|
| Date: | 3/4/2014 | Permit No.: | TBD | Regulated Entity No.: | TBD |
| Area Name: | Tenaska Roan's Prairie Generating Station | | | Customer Reference No.: | CN600698948 |

Review of applications and issuance of permits will be expedited by supplying all necessary information requested on this Table.

| AIR CONTAMINANT DATA | | | | | |
|----------------------|---------|---------------------------|--------------------------------------|----------------------------------|---------|
| 1. Emission Point | | | 2. Component or Air Contaminant Name | 3. Air Contaminant Emission Rate | |
| (A) EPN | (B) FIN | (C) NAME | | (A) POUND | (B) TPY |
| FWPUMP | FWPUMP | Fire Water Pump | NO _x | 3.78 | 0.19 |
| | | | CO | 3.84 | 0.19 |
| | | | VOC | 1.45 | 0.07 |
| | | | SO ₂ | 0.01 | <0.01 |
| | | | PM | 0.19 | 0.01 |
| | | | PM ₁₀ | 0.19 | 0.01 |
| | | | PM _{2.5} | 0.19 | 0.01 |
| | | | H ₂ SO ₄ | <0.01 | <0.01 |
| | | | HAP (excluding Pb) | 0.02 | <0.01 |
| | | | Formaldehyde | <0.01 | <0.01 |
| | | | CO ₂ | 654.79 | 32.74 |
| | | | CH ₄ | 0.03 | <0.01 |
| | | | N ₂ O | 0.01 | <0.01 |
| | | | CO _{2e} | 657.04 | 32.85 |
| CBFUG | CBFUG | Circuit Breaker Fugitives | SF ₆ | <0.01 | 0.01 |
| | | | CO _{2e} | 45.55 | 199.50 |
| MSSFUG | MSSFUG | Maintenance Activites | NO _x | <0.01 | <0.01 |
| | | | CO | <0.01 | <0.01 |
| | | | VOC | 0.30 | <0.01 |
| | | | PM | 0.20 | 0.04 |
| | | | PM ₁₀ | 0.20 | 0.04 |
| | | | PM _{2.5} | 0.20 | 0.04 |
| | | | HAP (excluding Pb) | 0.30 | <0.01 |
| | | | CO ₂ | 0.92 | 0.01 |
| | | | CH ₄ | 16.70 | 0.11 |
| | | | CO _{2e} | 418.43 | 2.88 |
| FUG | FUG | Fugitives | VOC | 0.01 | 0.06 |
| | | | HAP (excluding Pb) | 0.01 | 0.06 |
| | | | CO ₂ | 0.04 | 0.18 |
| | | | CH ₄ | 0.75 | 3.30 |
| | | | CO _{2e} | 18.87 | 82.65 |

EPN = Emission Point Number
 FIN = Facility Identification Number

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TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Table 1(a) Emission Point Summary

| | | | | | |
|------------|---|-------------|-----|-------------------------|-------------|
| Date: | 3/4/2014 | Permit No.: | TBD | Regulated Entity No.: | TBD |
| Area Name: | Tenaska Roan's Prairie Generating Station | | | Customer Reference No.: | CN600698948 |

Review of applications and issuance of permits will be expedited by supplying all necessary information requested on this Table.

| AIR CONTAMINANT DATA | | | EMISSION POINT DISCHARGE PARAMETERS | | | | | | | | | | |
|----------------------|---------|----------------------------|--------------------------------------|---------------|----------------|--------------------|------------------------|--------------------|--------------------|----------------------|------------------|-----------------|------------------|
| 1. Emission Point | | | 4. UTM Coordinates of Emission Point | | | Source | | | | | | | |
| | | | | | | 5. Building Height | 6. Height Above Ground | 7. Stack Exit Data | | | 8. Fugitives | | |
| EPN (A) | FIN (B) | Name (C) | Zone | East (Meters) | North (Meters) | (Ft.) | (Ft.) | Diameter (Ft.) (A) | Velocity (FPS) (B) | Temperature (°F) (C) | Length (Ft.) (A) | Width (Ft.) (B) | Axis Degrees (C) |
| 1 | 1 | Unit 1 (GE 7FA.05 Turbine) | 15 | 219,403 | 3,387,566 | 21.0 | 60.0 | 20.0 | 125.4 | 1,055 | -- | -- | -- |
| 2 | 2 | Unit 2 (GE 7FA.05 Turbine) | 15 | 219,420 | 3,387,523 | 21.0 | 60.0 | 20.0 | 125.4 | 1,055 | -- | -- | -- |
| 3 | 3 | Unit 3 (GE 7FA.05 Turbine) | 15 | 219,438 | 3,387,480 | 21.0 | 60.0 | 20.0 | 125.4 | 1,055 | -- | -- | -- |
| EMGEN | EMGEN | Emergency Generator Engine | 15 | 219,528 | 3,387,595 | 21.0 | 14.0 | 1.0 | 323.4 | 768 | -- | -- | -- |
| FWPUMP | FWPUMP | Fire Water Pump | 15 | 219,380 | 3,387,593 | 10.5 | 14.0 | 1.0 | 75.9 | 884 | -- | -- | -- |
| CBFUG | CBFUG | Circuit Breaker Fugitives | 15 | 219,509 | 3,387,556 | -- | 3.0 | -- | -- | -- | 850 | 660 | 77 W |
| MSSFUG | MSSFUG | Maintenance Activites | 15 | 219,509 | 3,387,556 | -- | 3.0 | -- | -- | -- | 850 | 660 | 77 W |
| FUG | FUG | Fugitives | 15 | 219,509 | 3,387,556 | -- | 3.0 | -- | -- | -- | 850 | 660 | 77 W |

EPN = Emission Point Number
 FIN = Facility Identification Number



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Table 1(a) Emission Point Summary

| | | | | | |
|------------|---|-------------|-----|-------------------------|-------------|
| Date: | 3/4/2014 | Permit No.: | TBD | Regulated Entity No.: | TBD |
| Area Name: | Tenaska Roan's Prairie Generating Station | | | Customer Reference No.: | CN600698948 |

Review of applications and issuance of permits will be expedited by supplying all necessary information requested on this Table.

| AIR CONTAMINANT DATA | | | | | |
|----------------------|---------|----------------------------|--------------------------------------|----------------------------------|------------|
| 1. Emission Point | | | 2. Component or Air Contaminant Name | 3. Air Contaminant Emission Rate | |
| (A) EPN | (B) FIN | (C) NAME | | (A) POUND | (B) TPY |
| 1 | 1 | Unit 1 (GE 7FA.04 Turbine) | NO _x | 37.20 | 5.26 |
| | | | NO _x (MSS) | 37.20 | 6.57 |
| | | | CO | 2.88 | 4.20 |
| | | | CO (MSS) | 2.88 | 0.12 |
| | | | VOC | 9.30 | 13.58 |
| | | | VOC (MSS) | 9.90 | 1.24 |
| | | | SO ₂ | <0.01 | 13.58 |
| | | | PM | <0.01 | 13.58 |
| | | | PM ₁₀ | <0.01 | 0.44 |
| | | | PM _{2.5} | <0.01 | 0.01 |
| | | | H ₂ SO ₄ | 262,705.55 | 383,550.10 |
| | | | Pb | 4.85 | 7.07 |
| | | | HAP (excluding Pb) | 2.57 | 3.76 |
| | | | Formaldehyde | 0.09 | 0.13 |
| | | | CO ₂ | 0.48 | 0.71 |
| | | | CH ₄ | 262,971.06 | 383,937.75 |
| | | | N ₂ O | <0.01 | <0.01 |
| CO _{2e} | <0.01 | <0.01 | | | |

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TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Table 1(a) Emission Point Summary

| | | | | | |
|------------|---|-------------|-----|-------------------------|-------------|
| Date: | 3/4/2014 | Permit No.: | TBD | Regulated Entity No.: | TBD |
| Area Name: | Tenaska Roan's Prairie Generating Station | | | Customer Reference No.: | CN600698948 |

Review of applications and issuance of permits will be expedited by supplying all necessary information requested on this Table.

| AIR CONTAMINANT DATA | | | | | |
|----------------------|---------|----------------------------|--------------------------------------|----------------------------------|------------|
| 1. Emission Point | | | 2. Component or Air Contaminant Name | 3. Air Contaminant Emission Rate | |
| (A) EPN | (B) FIN | (C) NAME | | (A) POUND | (B) TPY |
| 2 | 2 | Unit 2 (GE 7FA.04 Turbine) | NO _x | 37.20 | 5.26 |
| | | | NO _x (MSS) | 37.20 | 6.57 |
| | | | CO | 2.88 | 4.20 |
| | | | CO (MSS) | 2.88 | 0.12 |
| | | | VOC | 9.30 | 13.58 |
| | | | VOC (MSS) | 9.90 | 1.24 |
| | | | SO ₂ | <0.01 | 13.58 |
| | | | PM | <0.01 | 13.58 |
| | | | PM ₁₀ | <0.01 | 0.44 |
| | | | PM _{2.5} | <0.01 | 0.01 |
| | | | H ₂ SO ₄ | 262,705.55 | 383,550.10 |
| | | | Pb | 4.85 | 7.07 |
| | | | HAP (excluding Pb) | 2.57 | 3.76 |
| | | | Formaldehyde | 0.09 | 0.13 |
| | | | CO ₂ | 0.48 | 0.71 |
| | | | CH ₄ | 262,971.06 | 383,937.75 |
| | | | N ₂ O | <0.01 | <0.01 |
| CO _{2e} | <0.01 | <0.01 | | | |

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TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Table 1(a) Emission Point Summary

| | | | | | |
|------------|---|-------------|-----|-------------------------|-------------|
| Date: | 3/4/2014 | Permit No.: | TBD | Regulated Entity No.: | TBD |
| Area Name: | Tenaska Roan's Prairie Generating Station | | | Customer Reference No.: | CN600698948 |

Review of applications and issuance of permits will be expedited by supplying all necessary information requested on this Table.

| AIR CONTAMINANT DATA | | | | | |
|----------------------|----------|----------------------------|--------------------------------------|----------------------------------|------------|
| 1. Emission Point | | | 2. Component or Air Contaminant Name | 3. Air Contaminant Emission Rate | |
| (A) EPN | (B) FIN | (C) NAME | | (A) POUND | (B) TPY |
| 3 | 3 | Unit 3 (GE 7FA.04 Turbine) | NO _x | 37.20 | 5.26 |
| | | | NO _x (MSS) | 37.20 | 6.57 |
| | | | CO | 2.88 | 4.20 |
| | | | CO (MSS) | 2.88 | 0.12 |
| | | | VOC | 9.30 | 13.58 |
| | | | VOC (MSS) | 9.90 | 1.24 |
| | | | SO ₂ | <0.01 | 13.58 |
| | | | PM | <0.01 | 13.58 |
| | | | PM ₁₀ | <0.01 | 0.44 |
| | | | PM _{2.5} | <0.01 | 0.01 |
| | | | H ₂ SO ₄ | 262,705.55 | 383,550.10 |
| | | | Pb | 4.85 | 7.07 |
| | | | HAP (excluding Pb) | 2.57 | 3.76 |
| | | | Formaldehyde | 0.09 | 0.13 |
| | | | CO ₂ | 0.48 | 0.71 |
| | | | CH ₄ | 262,971.06 | 383,937.75 |
| N ₂ O | <0.01 | <0.01 | | | |
| CO _{2e} | <0.01 | <0.01 | | | |
| EMGEN | EMGEN | Emergency Generator Engine | NO _x | 30.91 | 1.55 |
| | | | CO | 16.91 | 0.85 |
| | | | VOC | 2.07 | 0.10 |
| | | | SO ₂ | 0.03 | <0.01 |
| | | | PM | 0.97 | 0.05 |
| | | | PM ₁₀ | 0.97 | 0.05 |
| | | | PM _{2.5} | 0.97 | 0.05 |
| | | | H ₂ SO ₄ | <0.01 | <0.01 |
| | | | HAP (excluding Pb) | 0.03 | <0.01 |
| | | | Formaldehyde | <0.01 | <0.01 |
| | | | CO ₂ | 3,125.45 | 156.27 |
| | | | CH ₄ | 0.13 | 0.01 |
| | | | N ₂ O | 0.03 | <0.01 |
| CO _{2e} | 3,136.18 | 156.81 | | | |

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TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Table 1(a) Emission Point Summary

| | | | | | |
|------------|---|-------------|-----|-------------------------|-------------|
| Date: | 3/4/2014 | Permit No.: | TBD | Regulated Entity No.: | TBD |
| Area Name: | Tenaska Roan's Prairie Generating Station | | | Customer Reference No.: | CN600698948 |

Review of applications and issuance of permits will be expedited by supplying all necessary information requested on this Table.

| AIR CONTAMINANT DATA | | | | | |
|----------------------|---------|---------------------------|--------------------------------------|----------------------------------|---------|
| 1. Emission Point | | | 2. Component or Air Contaminant Name | 3. Air Contaminant Emission Rate | |
| (A) EPN | (B) FIN | (C) NAME | | (A) POUND | (B) TPY |
| FWPUMP | FWPUMP | Fire Water Pump | NO _x | 3.78 | 0.19 |
| | | | CO | 3.84 | 0.19 |
| | | | VOC | 1.45 | 0.07 |
| | | | SO ₂ | 0.01 | <0.01 |
| | | | PM | 0.19 | 0.01 |
| | | | PM ₁₀ | 0.19 | 0.01 |
| | | | PM _{2.5} | 0.19 | 0.01 |
| | | | H ₂ SO ₄ | <0.01 | <0.01 |
| | | | HAP (excluding Pb) | 0.02 | <0.01 |
| | | | Formaldehyde | <0.01 | <0.01 |
| | | | CO ₂ | 654.79 | 32.74 |
| | | | CH ₄ | 0.03 | <0.01 |
| | | | N ₂ O | 0.01 | <0.01 |
| | | | CO _{2e} | 657.04 | 32.85 |
| CBFUG | CBFUG | Circuit Breaker Fugitives | SF ₆ | <0.01 | 0.01 |
| | | | CO _{2e} | 45.55 | 199.50 |
| MSSFUG | MSSFUG | Maintenance Activites | NO _x | <0.01 | <0.01 |
| | | | CO | <0.01 | <0.01 |
| | | | VOC | 0.30 | <0.01 |
| | | | PM | 0.20 | 0.04 |
| | | | PM ₁₀ | 0.20 | 0.04 |
| | | | PM _{2.5} | 0.20 | 0.04 |
| | | | HAP (excluding Pb) | 0.30 | <0.01 |
| | | | CO ₂ | 0.92 | 0.01 |
| | | | CH ₄ | 16.70 | 0.11 |
| | | | CO _{2e} | 418.43 | 2.88 |
| FUG | FUG | Fugitives | VOC | 0.01 | 0.06 |
| | | | HAP (excluding Pb) | 0.01 | 0.06 |
| | | | CO ₂ | 0.04 | 0.18 |
| | | | CH ₄ | 0.75 | 3.30 |
| | | | CO _{2e} | 18.87 | 82.65 |

EPN = Emission Point Number
 FIN = Facility Identification Number

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TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Table 1(a) Emission Point Summary

| | | | | | |
|-------------------|---|--------------------------------|-------------|------------------------------|-----|
| Date: | 3/4/2014 | Permit No.: | TBD | Regulated Entity No.: | TBD |
| Area Name: | Tenaska Roan's Prairie Generating Station | Customer Reference No.: | CN600698948 | | |

Review of applications and issuance of permits will be expedited by supplying all necessary information requested on this Table.

| AIR CONTAMINANT DATA | | | EMISSION POINT DISCHARGE PARAMETERS | | | | | | | | | | |
|----------------------|------------|----------------------------|--------------------------------------|------------------|-------------------|-----------------|-----------------|-----------------------|-----------------------|-------------------------|---------------------|--------------------|---------------------|
| 1. Emission Point | | | 4. UTM Coordinates of Emission Point | | | Source | | | | | | | |
| EPN (A) | FIN (B) | Name (C) | Zone | East (Meters) | North (Meters) | 5. Building | | 7. Stack Exit Data | | | 8. Fugitives | | |
| | | | | | | Height (Ft.) | Ground (Ft.) | Diameter (Ft.) (A) | Velocity (FPS) (B) | Temperature (°F) (C) | Length (Ft.) (A) | Width (Ft.) (B) | Axis Degrees (C) |
| 1 | 1 | Unit 1 (GE 7FA.04 Turbine) | 15 | 219,403 | 3,387,566 | 21.0 | 60.0 | 20.0 | 114.9 | 1,055 | -- | -- | -- |
| 2 | 2 | Unit 2 (GE 7FA.04 Turbine) | 15 | 219,420 | 3,387,523 | 21.0 | 60.0 | 20.0 | 114.9 | 1,055 | -- | -- | -- |
| 3 | 3 | Unit 3 (GE 7FA.04 Turbine) | 15 | 219,438 | 3,387,480 | 21.0 | 60.0 | 20.0 | 114.9 | 1,055 | -- | -- | -- |
| EMGEN | EMGEN | Emergency Generator Engine | 15 | 219,528 | 3,387,595 | 21.0 | 14.0 | 1.0 | 323.4 | 768 | -- | -- | -- |
| FWPUMP | FWPUMP | Fire Water Pump | 15 | 219,380 | 3,387,593 | 10.5 | 14.0 | 1.0 | 75.9 | 884 | -- | -- | -- |
| CBFUG | CBFUG | Circuit Breaker Fugitives | 15 | 219,509 | 3,387,556 | -- | 3.0 | -- | -- | -- | 850 | 660 | 77 W |
| MSSFUG | MSSFUG | Maintenance Activites | 15 | 219,509 | 3,387,556 | -- | 3.0 | -- | -- | -- | 850 | 660 | 77 W |
| FUG | FUG | Fugitives | 15 | 219,509 | 3,387,556 | -- | 3.0 | -- | -- | -- | 850 | 660 | 77 W |

EPN = Emission Point Number
 FIN = Facility Identification Number

US EPA ARCHIVE DOCUMENT

TABLE B-1
TRPP
Tenaska Roans Prairie Generating Station
GHG BACT Analysis
Conceptual Cost Estimate for Carbon Capture and Sequestration

| Post-Combustion CO ₂ Capture and Compression | | |
|---|-----------------------------|---------------|
| Capital ¹ | \$890/kW | \$585,971,629 |
| Annual O&M ¹ | \$0.00124/kWh | \$9,565,360 |
| Annual Fuel ² | 14.7% fuel use at \$4/MMBtu | \$11,888,654 |

| Pipeline Cost Breakdown ³ | | |
|--------------------------------------|--|-------------|
| L, Pipeline Length (miles) | | 10 |
| D, Pipeline Diameter (inches) | | 10 |
| Pipeline Costs | | |
| Materials | $64,632 + \$1.85 \times L \times (330.5 \times D^2 + 686.7 \times D20 + 26,960)$ | \$1,301,857 |
| Labor | $341,627 + \$1.85 \times L \times (343.2 \times D^2 + 2074 \times D + 170,013)$ | \$4,505,478 |
| Miscellaneous | $\$150,166 + \$1.58 \times L \times (8,417 \times D + 7,234)$ | \$1,594,349 |
| Right of Way | $\$48,037 + \$1.2 \times L \times (577 \times D + 29,788)$ | \$474,733 |
| Other Capital | | |
| CO ₂ Surge Tank | Fixed | \$1,150,636 |
| Pipeline Control System | Fixed | \$110,632 |
| O&M | | |
| Fixed O&M (\$/year) | $\$8,632 \times L$ | \$86,320 |

| Geologic Storage Costs ³ | | |
|-------------------------------------|---|--------------|
| Number of Injection Wells | | 1 |
| Well Depth (m) | | 2,134 |
| CO ₂ Captured (tons) | | 1,150,246.80 |
| Capital | | |
| Site Screening and Evaluation | Fixed | \$4,738,488 |
| Injection Wells | $\$240,714 \times e^{0.0008 \times \text{Well Depth}}$ | \$1,327,177 |
| Injection Equipment | $\$94,029 \times (7,839 / (280 \times \text{Number of Injection Wells}))^{0.5}$ | \$497,523 |
| Liability Bond | Fixed | \$5,000,000 |
| Declining Capital Funds | | |
| Pore Space Acquisition | $\$0.334 / \text{short ton CO}_2$ | \$384,182 |
| O&M | | |
| Normal Daily Expenses | $\$11,566 / \text{Injection Well}$ | \$11,566 |
| Consumables | $\$2,995 / \text{yr} / \text{ton CO}_2 / \text{day}$ | \$9,438,326 |
| Surface Maintenance | $\$23,478 \times (7,839 / (280 \times \text{Number of Injection Wells}))^{0.5}$ | \$124,226 |
| Subsurface Maintenance | $\$7.08 / \text{ft} - \text{depth} / \text{Injection Well}$ | \$15,109 |

| Annualized Cost Estimate | |
|---|---------------|
| Economic Life, years | 20 |
| Interest Rate (%) | 10 |
| Capital Costs | \$607,056,683 |
| O&M Costs (Annual) | \$31,129,562 |
| Capital Recovery | \$71,304,650 |
| Total Annualized Cost | \$102,434,212 |
| Total CO ₂ Controlled (tpy) | 1,150,247 |
| CO ₂ Cost Effectiveness (\$/ton) | 89 |

¹ Adapted from Cost and Performance Baseline For Fossil Energy Plants, Volume 1: Bituminous and Natural Gas to Electricity, DOE/2010/1397 (Revision 2, November 2010). Plant output converted from simple cycle to equivalent Frame 7EA combined cycle output to enable use of cost information (www.ge-energy.com/products and [services/products/gas turbines heavy duty/7ea heavy duty gas turbine.jsp](http://www.ge-energy.com/services/products/gas_turbines_heavy_duty/7ea_heavy_duty_gas_turbine.jsp)). Capital costs adjusted using the ENR Construction Cost Index to 2012 dollars. O&M costs not adjusted.

² Fuel costs represent the additional fuel necessary to compensate for parasitic load caused by the addition of CCS. Based on review of review of the plant heat rates used in Case 13 and 14 presented in Cost and Performance Baseline For Fossil Energy Plants, Volume 1: Bituminous and Natural Gas to Electricity, DOE/2010/1397 (Revision 2, November 2010), CCS imposes a 14.7% increase in the plant heat rate; therefore, 14.7% more fuel is necessary to meet plant output. That amount of output need to come from somewhere, and is assumed to be equivalent to the cost

³ Pipeline and Geologic Storage cost estimates based on National Energy Technology Laboratory (US DOE) document, *Estimating Carbon Dioxide Transport and Storage Costs*, DOE/NETL-2010/1447 (March 2010). The distance to the nearest storage formation was taken from the Gulf Coast Carbon Center. Grimes County is located on the Gulf Coast Oligocene Brine Formation, as a best case scenario it was assumed a brine formation disposal well would be available within 10 miles of the facility.

TABLE B-2

TRPP

**Tenaska Roan's Prairie Generating Station
Grimes County, Texas
Project Potential Emissions Increase - Siemens Option**

Project: Three (3) Turbines, no base-line case (new facility)

| Pollutant | Single (one) Siemens SGT6-5000F(5ee) Turbine Emissions (tpy) | Total for Three Siemens Turbines (tpy) | Emergency Generator (tpy) | Emergency Fire Pump (tpy) | Fugitive SF ₆ Leakage (tpy) | Maintenance Emissions (tpy) | Fugitive Natural Gas Emissions (tpy) | Total Project Emissions (tpy) |
|--------------------------------|--|--|---------------------------|---------------------------|--|-----------------------------|--------------------------------------|-------------------------------|
| NO _x | 123.55 | 370.66 | 1.55 | 0.19 | - | 5.97E-07 | - | 372.39 |
| CO | 170.67 | 512.02 | 0.85 | 0.19 | - | 3.63E-07 | - | 513.06 |
| VOC | 24.11 | 72.32 | 0.10 | 0.07 | - | 2.05E-03 | 0.06 | 72.56 |
| SO ₂ | 5.15 | 15.44 | 1.46E-03 | 3.06E-04 | - | - | - | 15.44 |
| PM | 15.95 | 47.85 | 0.05 | 0.01 | - | 0.04 | - | 47.95 |
| PM ₁₀ | 15.95 | 47.85 | 0.05 | 0.01 | - | 0.04 | - | 47.95 |
| PM _{2.5} | 15.95 | 47.85 | 0.05 | 0.01 | - | 0.04 | - | 47.95 |
| H ₂ SO ₄ | 0.89 | 2.67 | 1.46E-04 | 3.06E-05 | - | - | - | 2.67 |
| Lead | 0.02 | 0.05 | - | - | - | - | - | 0.046 |
| CO ₂ | 425,954.12 | 1,277,862.35 | 156.27 | 32.74 | - | 0.01 | 0.18 | 1,278,051.55 |
| CH ₄ | 7.86 | 23.57 | 0.01 | 1.33E-03 | - | 0.11 | 3.30 | 26.99 |
| N ₂ O | 0.79 | 2.36 | 1.27E-03 | 2.66E-04 | - | - | - | 2.36 |
| SF ₆ | - | - | - | - | 0.01 | - | - | 0.01 |
| GHG (CO ₂ e) | 426,384.63 | 1,279,153.89 | 156.81 | 32.85 | 199.50 | 2.88 | 82.65 | 1,279,628.59 |
| Total HAPs (excluding lead) | 2.32 | 6.96 | 1.51E-03 | 7.78E-04 | - | 2.05E-03 | 0.06 | 7.02 |
| Formaldehyde | 1.21 | 3.63 | 7.56E-05 | 7.85E-06 | - | - | - | 3.63 |

TABLE B-3

TRPP

**Tenaska Roan's Prairie Generating Station
Grimes County, Texas
Project Potential Emissions Increase - GE 7FA.05 Option**

Project: Three (3) Turbines, no base-line case (new facility)

| Pollutant | Single (one) GE 7FA.05 Turbine Emissions (tpy) | Total for Three GE 7FA.05 Turbines Emissions (tpy) | Emergency Generator (tpy) | Emergency Fire Pump (tpy) | Fugitive SF ₆ Leakage (tpy) | Maintenance Emissions (tpy) | Fugitive Natural Gas Emissions (tpy) | Total Project Emissions (tpy) |
|--------------------------------|--|--|---------------------------|---------------------------|--|-----------------------------|--------------------------------------|-------------------------------|
| NO _x | 122.09 | 366.28 | 1.55 | 0.19 | - | 5.97E-07 | - | 368.01 |
| CO | 198.01 | 594.04 | 0.85 | 0.19 | - | 3.63E-07 | - | 595.07 |
| VOC | 29.35 | 88.04 | 0.10 | 0.07 | - | 2.05E-03 | 0.06 | 88.27 |
| SO ₂ | 4.66 | 13.97 | 1.46E-03 | 3.06E-04 | - | - | - | 13.97 |
| PM | 14.82 | 44.46 | 0.05 | 0.01 | - | 0.04 | - | 44.55 |
| PM ₁₀ | 14.82 | 44.46 | 0.05 | 0.01 | - | 0.04 | - | 44.55 |
| PM _{2.5} | 14.82 | 44.46 | 0.05 | 0.01 | - | 0.04 | - | 44.55 |
| H ₂ SO ₄ | 0.47 | 1.40 | 1.46E-04 | 3.06E-05 | - | - | - | 1.40 |
| Lead | 0.02 | 0.05 | - | - | - | - | - | 0.045 |
| CO ₂ | 414,814.19 | 1,244,442.56 | 156.27 | 32.74 | - | 0.01 | 0.18 | 1,244,631.76 |
| CH ₄ | 7.65 | 22.95 | 0.01 | 1.33E-03 | - | 0.11 | 3.30 | 26.37 |
| N ₂ O | 0.77 | 2.30 | 1.27E-03 | 2.66E-04 | - | - | - | 2.30 |
| SF ₆ | - | - | - | - | 0.01 | - | - | 0.01 |
| GHG (CO ₂ e) | 415,233.44 | 1,245,700.32 | 156.81 | 32.85 | 199.50 | 2.88 | 82.65 | 1,246,175.02 |
| Total HAPs (excluding lead) | 2.26 | 6.78 | 1.51E-03 | 7.78E-04 | - | 2.05E-03 | 0.06 | 6.84 |
| Formaldehyde | 1.18 | 3.54 | 7.56E-05 | 7.85E-06 | - | - | - | 3.54 |

TABLE B-4

TRPP

**Tenaska Roan's Prairie Generating Station
Grimes County, Texas
Project Potential Emissions Increase - GE 7FA.04 Option**

Project: Three (3) Turbines, no base-line case (new facility)

| Pollutant | Single (one) GE 7FA.04 Turbine Emissions (tpy) | Total for Three GE 7FA.04 Turbine Emissions (tpy) | Emergency Generator (tpy) | Emergency Fire Pump (tpy) | Fugitive SF ₆ Leakage (tpy) | Maintenance Emissions (tpy) | Fugitive Natural Gas Emissions (tpy) | Total Project Emissions (tpy) |
|--------------------------------|--|---|---------------------------|---------------------------|--|-----------------------------|--------------------------------------|-------------------------------|
| NO _x | 111.51 | 334.52 | 1.55 | 0.19 | - | 5.97E-07 | - | 336.26 |
| CO | 125.38 | 376.13 | 0.85 | 0.19 | - | 3.63E-07 | - | 377.17 |
| VOC | 11.83 | 35.48 | 0.10 | 0.07 | - | 2.05E-03 | 0.06 | 35.71 |
| SO ₂ | 4.33 | 12.98 | 1.46E-03 | 3.06E-04 | - | - | - | 12.99 |
| PM | 14.82 | 44.46 | 0.05 | 0.01 | - | 0.04 | - | 44.55 |
| PM ₁₀ | 14.82 | 44.46 | 0.05 | 0.01 | - | 0.04 | - | 44.55 |
| PM _{2.5} | 14.82 | 44.46 | 0.05 | 0.01 | - | 0.04 | - | 44.55 |
| H ₂ SO ₄ | 0.44 | 1.31 | 1.46E-04 | 3.06E-05 | - | - | - | 1.31 |
| Lead | 0.014 | 0.042 | - | - | - | - | - | 0.042 |
| CO ₂ | 383,550.10 | 1,150,650.29 | 156.27 | 32.74 | - | 0.01 | 0.18 | 1,150,839.49 |
| CH ₄ | 7.07 | 21.22 | 0.01 | 1.33E-03 | - | 0.11 | 3.30 | 24.64 |
| N ₂ O | 0.71 | 2.12 | 1.27E-03 | 2.66E-04 | - | - | - | 2.12 |
| SF ₆ | - | - | - | - | 0.00875 | - | - | 0.01 |
| GHG (CO ₂ e) | 383,937.75 | 1,151,813.26 | 156.81 | 32.85 | 199.50 | 2.88 | 82.65 | 1,152,287.96 |
| Total HAPs (excluding lead) | 2.09 | 6.26 | 1.51E-03 | 7.78E-04 | - | 2.05E-03 | 0.06 | 6.33 |
| Formaldehyde | 1.09 | 3.27 | 7.56E-05 | 7.85E-06 | - | - | - | 3.27 |

TABLE B-5

TRPP

Tenaska Roan's Prairie Generating Station
Grimes County, Texas
Siemens SGT6-5000F Emissions Calculations

Potential Emissions - Siemens SGT6-5000F Gas Turbine

| Parameter | Value | Units | Source |
|--------------------------------|-------|----------------------|---|
| Turbine Max. Heat Input Rating | 2,441 | MMBtu/hr per turbine | Manufacturer's Specifications |
| Turbine Min. Heat Input Rating | 1,250 | MMBtu/hr per turbine | Manufacturer's Specifications |
| Number of Turbines | 1 | | |
| Turbine Operating Time | 2,920 | hrs | Maximum allowable hours per year for a peaking unit |

| Pollutant | Emissions Factor | | Emissions from turbine (lb/hr) | Emissions from turbine (tpy) | Reference Footnote |
|--------------------------------|--|-------------------|--------------------------------|------------------------------|--------------------|
| NO _x | 9 ppmvd @ 15% O ₂ | 0.0332 lb/MMBtu | 79.00 | 115.34 | [1,2] |
| CO | 9 ppmvd @ 15% O ₂ | 0.0202 lb/MMBtu | 32.40 | 47.30 | [1,2] |
| VOC | 1 ppmvd @ 15% O ₂ | 0.0013 lb/MMBtu | 3.00 | 4.38 | [1,2] |
| SO ₂ | 0.5 gr/100 dscf fuels | 0.0014 lb/MMBtu | 3.45 | 5.04 | [3] |
| PM | | 0.004 lb/MMBtu | 10.00 | 14.60 | [4] |
| PM ₁₀ | | 0.004 lb/MMBtu | 10.00 | 14.60 | [4] |
| PM _{2.5} | | 0.004 lb/MMBtu | 10.00 | 14.60 | [4] |
| H ₂ SO ₄ | 0.18 lb H ₂ SO ₄ /lb SO ₂ | 0.00025 lb/MMBtu | 0.61 | 0.89 | [5] |
| Lead | 0.005 lb/MMscf | 4.35E-06 lb/MMBtu | 0.0106 | 0.015 | [6] |
| CO ₂ | 54.22 kg/MMBtu | 119.50 lb/MMBtu | 291,749.39 | 425,954.12 | [7] |
| CH ₄ | 0.001 kg/MMBtu | 0.002 lb/MMBtu | 5.38 | 7.86 | [8] |
| N ₂ O | 0.0001 kg/MMBtu | 0.0002 lb/MMBtu | 0.54 | 0.79 | [8] |
| CO ₂ e | | | 292,044.27 | 426,384.63 | [8] |

- [1] NO_x, CO, and VOC emission factors in ppmvd taken from BACT determination
- [2] NO_x, CO, and VOC emission rates based on vendor guarantees
- [3] SO₂: Emission rates based on vendor guarantees 0.5
- [4] PM emission rate, including condensible PM, furnished by Siemens. All PM is PM_{2.5} or less, Presumed BACT.
- [5] Ratio of sulfuric acid mist emissions estimated by Siemens as 0.6 lb/hr, to SO₂ at 3.4 lb/hr, assuming sulfur content of natural gas as 0.5 gr/100 scf. Emission rate shown
- [6] No factor for Turbines, Lead emission factor from AP-42 Table 1.4-2 (0.0005 lb/MMscf), assumed natural gas heat value of 1,050 Btu/scf for boilers.
- [7] Based on projected fuel composition from supplier, see Appendix D. Thermal input is displayed as 2,441 MMBtu/hr, but emissions calculations use more significant digits than this.
- [8] Based on USEPA's Mandatory Reporting Rule, Table C-2. To convert to CO₂e, the following global warming potentials were used - CH₄ = 25, N₂O = 298.

TABLE B-5

TRPP

**Tenaska Roan's Prairie Generating Station
Grimes County, Texas
Siemens SGT6-5000F Emissions Calculations**

Potential HAP Emissions - Siemens SGT6-5000F(5ee) Gas Turbine

| Pollutant | Emissions Factor | Emissions from Turbine (lb/hr) | Emissions from Turbine (tpy) | Reference Footnote |
|------------------------|-------------------|--------------------------------|------------------------------|--------------------|
| Toluene | 1.30E-04 lb/MMBtu | 0.32 | 0.46 | [1] |
| Naphthalene | 1.30E-06 lb/MMBtu | 3.17E-03 | 4.63E-03 | [1] |
| Formaldehyde | 3.40E-04 lb/MMBtu | 0.83 | 1.21 | [2] |
| Benzene | 1.20E-05 lb/MMBtu | 0.03 | 0.04 | [1] |
| Acetaldehyde | 4.00E-05 lb/MMBtu | 0.10 | 0.14 | [1] |
| Ethylbenzene | 3.20E-05 lb/MMBtu | 0.08 | 0.11 | [1] |
| Propylene Oxide | 2.90E-05 lb/MMBtu | 0.07 | 0.10 | [1] |
| Xylenes | 6.40E-05 lb/MMBtu | 0.16 | 0.23 | [1] |
| 1,3-Butadiene | 4.30E-07 lb/MMBtu | 1.05E-03 | 1.53E-03 | [1] |
| PAH | 2.20E-06 lb/MMBtu | 0.01 | 0.01 | [1] |
| Total | 6.51E-04 lb/MMBtu | 1.59 | 2.32 | |

[1] Based on AP-42, Table 3.1-3, Emissions factors for HAP from gas-fired stationary gas turbines.
 [2] Average of stack test results from Kiamichi and Rolling Hills facilities with a 3X compliance margin to reflect site-to-site variability.

Turbine Heat Input Rating = MMBtu/hr per turbine
 Number of Turbines =
 Turbine Operating Time = hours per year

TABLE B-5

TRPP

**Tenaska Roan's Prairie Generating Station
Grimes County, Texas
Siemens SGT6-5000F Emissions Calculations**

Startup and Shutdown Emissions - Siemens SGT6-5000F(5ee) Gas Turbine

| | Startup (ignition to 100% load) | Shutdown (100% to fuel cut-off) | Reference Footnote |
|--------------------------------|------------------------------------|------------------------------------|--------------------|
| Est. Number of Events per year | 365 | 365 | [1] |
| Duration of Event (min/event) | 15.00 | 10.00 | [2] |

- [1] Numbers of Startup and Shutdown provided by TENASKA
- [2] Peaking Startup and Peaking Shutdown Event Duration from Siemens Energy

| Pollutant | Emissions (lb/event) | | Reference Footnote |
|-----------------|----------------------|----------|--------------------|
| | Startup | Shutdown | |
| NO _x | 25.0 | 20.0 | [1] |
| CO | 490.0 | 186.0 | [1] |
| VOC | 62.2 | 45.9 | [1] |
| SO ₂ | 0.33 | 0.28 | [1] |
| PM | 4.6 | 2.8 | [1] |

- [1] Emissions per Event from Siemens Energy. Siemens SO₂ emission per event (su-0.13 lb/event, sd-0.11 lb/event) is based on sulfur content of natural gas as 0.2 gr/100 scf. SO₂ emission rate shown was adjusted by ratio for ratio of actual natural gas sulfur content (act S/0.2).

| Pollutant | Startup and Shutdown Emissions (lb/hr) | Annual Startup/Shutdown Emissions per turbine (ton/yr) | Reference Footnote |
|-----------------|--|--|--------------------|
| NO _x | 91.08 | 8.21 | [1], [2] |
| CO | 694.90 | 123.37 | [1], [2] |
| VOC | 109.85 | 19.73 | [1], [2] |
| SO ₂ | 2.61 | 0.11 | [1], [2] |
| PM | 13.23 | 1.35 | [1], [2] |

- [1] Because the startup and shutdown events are less than 1 hr, the hourly startup and shutdown rates represent the mass of the event for both a startup and shutdown in one hour plus the worst-case emission rate scenario while at 100% load times the remainder of an hour ((60 minutes - event time in minutes)/60).

Sample calculation:

$$\frac{45.00 \text{ lb NO}_x}{\text{event}} \times \frac{1 \text{ event}}{\text{hr}} + \frac{79.00 \text{ lb NO}_x}{\text{hr}} \times \frac{60}{60 \text{ min/hr}} - \frac{25.00 \text{ min/hr}}{60 \text{ min/hr}} = \frac{91.08 \text{ lb NO}_x}{\text{hr}}$$

- [2] Annual Startup/Shutdown Emissions are calculated as the number of startup or shutdown events per year x the emissions per event.

TABLE B-5

TRPP

Tenaska Roan's Prairie Generating Station
 Grimes County, Texas
 Siemens SGT6-5000F Emissions Calculations

Maximum Hourly Emissions - Siemens SGT6-5000F(5ee) Gas Turbine

| Pollutant | Emissions from turbine (lb/hr) | Startup and Shutdown Emissions (lb/hr) | Maximum Hourly Emissions (lb/hr) |
|-----------------|--------------------------------|--|----------------------------------|
| NO _x | 79.00 | 91.08 | 91.08 |
| CO | 32.40 | 694.90 | 694.90 |
| VOC | 3.00 | 109.85 | 109.85 |
| SO ₂ | 3.45 | 2.61 | 3.45 |
| PM | 10.00 | 13.23 | 13.23 |

TABLE B-6

TRPP

Tenaska Roan's Prairie Generating Station
Grimes County, Texas
GE 7FA.05 Emissions Calculations

Potential Emissions - GE 7FA.05 Gas Turbine

| Parameter | Value | Unit | Source |
|--------------------------------|-------|----------------------|---|
| Turbine Max. Heat Input Rating | 2,378 | MMBtu/hr per turbine | Manufacturer's Specification |
| Number of Turbines | 1 | | |
| Turbine Operating Time | 2,920 | hours per year | Maximum allowable hours per year for a peaking unit |

| Pollutant | Emissions Factor | | Emissions from turbine (lb/hr) | Emissions from turbine (tpy) | Reference Footnote |
|--------------------------------|--|-------------------|--------------------------------|------------------------------|--------------------|
| NO _x | 9.0 ppmvd @ 15% O ₂ | 0.0332 lb/MMBtu | 76.00 | 110.96 | [1,2] |
| CO | 9.0 ppmvd @ 15% O ₂ | 0.0202 lb/MMBtu | 37.00 | 54.02 | [1,2] |
| VOC | 1.4 ppmvd @ 15% O ₂ | 0.0018 lb/MMBtu | 3.60 | 5.26 | [1,2] |
| SO ₂ | 0 gr/100 dscf fuels | 0.0000 lb/MMBtu | 3.10 | 4.53 | [3] |
| PM | | 0.00423 lb/MMBtu | 9.30 | 13.58 | [4] |
| PM ₁₀ | | 0.00423 lb/MMBtu | 9.30 | 13.58 | [4] |
| PM _{2.5} | | 0.00423 lb/MMBtu | 9.30 | 13.58 | [4] |
| H ₂ SO ₄ | 0.10 lb H ₂ SO ₄ /lb SO ₂ | 0.00000 lb/MMBtu | 0.32 | 0.47 | [5] |
| Lead | 0.005 lb/MMscf | 4.35E-06 lb/MMBtu | 0.0103 | 0.015 | [6] |
| CO ₂ | 54.22 kg/MMBtu | 119.50 lb/MMBtu | 284,119.31 | 414,814.19 | [7] |
| CH ₄ | 0.001 kg/MMBtu | 0.002 lb/MMBtu | 5.24 | 7.65 | [8] |
| N ₂ O | 0.0001 kg/MMBtu | 0.0002 lb/MMBtu | 0.52 | 0.77 | [8] |
| CO _{2e} | | | 284,406.47 | 415,233.44 | [8] |

- [1] NO_x, CO, and VOC emission factors in ppmvd taken from BACT determination
- [2] NO_x, CO, and VOC emission rates based on vendor guarantees
- [3] SO₂: Emission rates based on vendor guarantees
- [4] All PM is PM_{2.5} or less and includes condensable PM, Presumed BACT
- [5] Ratio of sulfuric acid mist emissions estimated by GE as 0.16 lb/hr, with SO₂ at 1.55 lb/hr, and assumes sulfur content of natural gas as 8 ppmw. Emission rate shown was calculated using GE ratio of 0.16/1.55 applied to calculated SO₂ emission rate using actual sulfur content of natural gas used. See Note 4.
- [6] No factor for Turbines, Lead emission factor from AP-42 Table 1.4-2 (0.0005 lb/MMscf), assumed natural gas heat value of 1,150 Btu/scf for boilers.
- [7] Based on projected fuel composition from supplier, see Appendix D. Thermal input is displayed as 2,378 MMBtu/hr, but emissions calculations use more significant digits than this.
- [8] Based on USEPA's Mandatory Reporting Rule, Table C-2. To convert to CO_{2e}, the following global warming potentials were used - CH₄ = 25, N₂O = 298.

TABLE B-6

TRPP

**Tenaska Roan's Prairie Generating Station
Grimes County, Texas
GE 7FA.05 Emissions Calculations**

Potential HAP Emissions- GE 7FA.05 Gas Turbine

| Pollutant | Emissions Factor | | Emissions from Turbine (lb/hr) | Emissions from Turbine (tpy) | Reference Footnote |
|-----------------|------------------|-----------------|--------------------------------|------------------------------|--------------------|
| Toluene | 1.30E-04 | lb/MMBtu | 0.31 | 0.45 | [1] |
| Naphthalene | 1.30E-06 | lb/MMBtu | 3.09E-03 | 4.51E-03 | [1] |
| Formaldehyde | 3.40E-04 | lb/MMBtu | 0.81 | 1.18 | [2] |
| Benzene | 1.20E-05 | lb/MMBtu | 0.03 | 0.04 | [1] |
| Acetaldehyde | 4.00E-05 | lb/MMBtu | 0.10 | 0.14 | [1] |
| Ethylbenzene | 3.20E-05 | lb/MMBtu | 0.08 | 0.11 | [1] |
| Propylene Oxide | 2.90E-05 | lb/MMBtu | 0.07 | 0.10 | [1] |
| Xylenes | 6.40E-05 | lb/MMBtu | 0.15 | 0.22 | [1] |
| 1,3-Butadiene | 4.30E-07 | lb/MMBtu | 1.02E-03 | 1.49E-03 | [1] |
| PAH | 2.20E-06 | lb/MMBtu | 5.23E-03 | 0.01 | [1] |
| Total | 6.51E-04 | lb/MMBtu | 1.55 | 2.26 | |

- [1] Based on AP-42, Table 3.1-3, Emissions factors for HAP from gas-fired stationary gas turbines.
- [2] Average of stack test results from Kiamichi and Rolling Hills facilities with a 3X compliance margin to reflect site-to-site variability.

Startup and Shutdown Emissions - GE 7FA.05 Gas Turbine

| | Startup | Shutdown | Reference Footnote |
|--------------------------------|---------|----------|--------------------|
| Est. Number of Events per year | 365 | 365 | [1] |
| Duration of Event (min/event) | 20.0 | 20.0 | [2] |

- [1] Numbers of Startup and Shutdown provided by TENASKA
- [2] Startup and Shutdown Event Duration from GE

TABLE B-6

TRPP

**Tenaska Roan's Prairie Generating Station
Grimes County, Texas
GE 7FA.05 Emissions Calculations**

| Pollutant | Emissions (lb/event) | | Reference Footnote |
|-----------------|----------------------|----------|--------------------|
| | Startup | Shutdown | |
| NO _x | 33.0 | 28.0 | [1] |
| CO | 386.0 | 403.0 | [1] |
| VOC | 55.0 | 77.0 | [1] |
| SO ₂ | 0.00 | 0.00 | [2] |
| PM | 3.4 | 3.4 | [1] |

- [1] Emissions per Event from GE
- [2] SO₂ emission factor assumed unchanged from maximum operation shown above

| Pollutant | Startup and Shutdown Emissions (lb/hr) | Annual Startup/Shutdown Emissions per turbine (ton/yr) | Reference Footnote |
|-----------------|--|--|--------------------|
| NO _x | 86.33 | 11.13 | [1], [2] |
| CO | 801.33 | 143.99 | [1], [2] |
| VOC | 133.20 | 24.09 | [1], [2] |
| SO ₂ | 1.03 | 0.00 | [1], [2] |
| PM | 9.90 | 1.24 | [1], [2] |

- [1] Because the startup and shutdown events are less than 1 hr, the hourly startup and shutdown rates represent the mass of the event for both a startup and shutdown in one hour plus the worst-case emission rate scenario while at 100% load times the remainder of an hour ((60 minutes - event time in minutes)/60).

Sample calculation:

$$\frac{61.00 \text{ lb NO}_x}{\text{event}} \times \frac{1 \text{ event}}{\text{hr}} + \frac{76.00 \text{ lb NO}_x}{\text{hr}} \times \frac{60 - 40.00 \text{ min/hr}}{60 \text{ min/hr}} = \frac{86.33 \text{ lb NO}_x}{\text{hr}}$$

- [2] Annual Startup/Shutdown Emissions are calculated at the number of startup or shutdown events per year x the emissions per event.

TABLE B-6

TRPP

Tenaska Roan's Prairie Generating Station
 Grimes County, Texas
 GE 7FA.05 Emissions Calculations

Maximum Hourly Emissions - GE 7FA.05 Gas Turbine

| Pollutant | Emissions from turbine (lb/hr) | Startup and Shutdown Emissions (lb/hr) | Maximum Hourly Emissions (lb/hr) |
|-----------------|--------------------------------|--|----------------------------------|
| NO _x | 76.00 | 86.33 | 86.33 |
| CO | 37.00 | 801.33 | 801.33 |
| VOC | 3.60 | 133.20 | 133.20 |
| SO ₂ | 3.10 | 1.03 | 3.10 |
| PM | 9.30 | 9.90 | 9.90 |

TABLE B-7

TRPP

Tenaska Roan's Prairie Generating Station
Grimes County, Texas
GE 7FA.04 Emissions Calculations

Potential Emissions - GE 7FA.04 Gas Turbine

| Parameter | Value | Unit | Source |
|--------------------------------|-------|----------------------|---|
| Turbine Max. Heat Input Rating | 2,198 | MMBtu/hr per turbine | Manufacturer's Specification |
| Number of Turbines | 1 | | |
| Turbine Operating Time | 2,920 | hours per year | Maximum allowable hours per year for a peaking unit |

| Pollutant | Emissions Factor | | Emissions from turbine (lb/hr) | Emissions from turbine (tpy) | Reference Footnote |
|--------------------------------|--|-------------------|--------------------------------|------------------------------|--------------------|
| NO _x | 9 ppmvd @ 15% O ₂ | 0.0332 lb/MMBtu | 69.00 | 100.74 | [1,2] |
| CO | 9 ppmvd @ 15% O ₂ | 0.0202 lb/MMBtu | 33.00 | 48.18 | [1,2] |
| VOC | 1.4 ppmvd @ 15% O ₂ | 0.0018 lb/MMBtu | 3.60 | 5.26 | [1,2] |
| SO ₂ | 0.5 gr/100 dscf fuels | 0.0014 lb/MMBtu | 2.88 | 4.20 | [3] |
| PM | | 0.00403 lb/MMBtu | 9.30 | 13.58 | [4] |
| PM ₁₀ | | 0.00403 lb/MMBtu | 9.30 | 13.58 | [4] |
| PM _{2.5} | | 0.00403 lb/MMBtu | 9.30 | 13.58 | [4] |
| H ₂ SO ₄ | 0.10 lb H ₂ SO ₄ /lb SO ₂ | 0.00015 lb/MMBtu | 0.30 | 0.44 | [5] |
| Lead | 0.005 lb/MMscf | 4.35E-06 lb/MMBtu | 0.0096 | 0.014 | [6] |
| CO ₂ | 54.22 kg/MMBtu | 119.50 lb/MMBtu | 262,705.55 | 383,550.10 | [7] |
| CH ₄ | 0.001 kg/MMBtu | 0.002 lb/MMBtu | 4.85 | 7.07 | [8] |
| N ₂ O | 0.0001 kg/MMBtu | 0.0002 lb/MMBtu | 0.48 | 0.71 | [8] |
| CO _{2e} | | | 262,971.06 | 383,937.75 | [8] |

[1] NO_x, CO, and VOC emission factors in ppmvd taken from BACT determination

[2] NO_x, CO, and VOC emission rates based on vendor guarantees

[3] SO₂: Emission rates based on vendor guarantees

0.5

[4] All PM is PM_{2.5} or less and includes condensible PM, Presumed BACT

[5] Ratio of sulfuric acid mist emissions estimated by GE as 0.16 lb/hr, with SO₂ at 1.55 lb/hr, and assumes sulfur content of natural gas as 8 ppmw. Emission rate shown was

[6] No factor for Turbines, Lead emission factor from AP-42 Table 1.4-2 (0.0005 lb/MMscf), assumed natural gas heat value of 1,150 Btu/scf for boilers.

[7] Based on projected fuel composition from supplier, see Appendix D. Thermal input is displayed as 2,198 MMBtu/hr, but emissions calculations use more significant digits than this.

[8] Based on USEPA's Mandatory Reporting Rule, Table C-2. To convert to CO_{2e}, the following global warming potentials were used - CH₄ = 25, N₂O = 298.

TABLE B-7

TRPP

**Tenaska Roan's Prairie Generating Station
Grimes County, Texas
GE 7FA.04 Emissions Calculations**

Potential HAP Emissions- GE 7FA.04 Gas Turbine

| Pollutant | Emissions Factor | | Turbine (lb/hr) | Turbine (tpy) | Reference Footnote |
|-----------------|------------------|-----------------|-----------------|---------------|--------------------|
| | | | | | |
| Toluene | 1.30E-04 | lb/MMBtu | 0.29 | 0.42 | [1] |
| Naphthalene | 1.30E-06 | lb/MMBtu | 2.86E-03 | 4.17E-03 | [1] |
| Formaldehyde | 3.40E-04 | lb/MMBtu | 0.75 | 1.09 | [2] |
| Benzene | 1.20E-05 | lb/MMBtu | 0.03 | 0.04 | [1] |
| Acetaldehyde | 4.00E-05 | lb/MMBtu | 0.09 | 0.13 | [1] |
| Ethylbenzene | 3.20E-05 | lb/MMBtu | 0.07 | 0.10 | [1] |
| Propylene Oxide | 2.90E-05 | lb/MMBtu | 0.06 | 0.09 | [1] |
| Xylenes | 6.40E-05 | lb/MMBtu | 0.14 | 0.21 | [1] |
| 1,3-Butadiene | 4.30E-07 | lb/MMBtu | 9.45E-04 | 1.38E-03 | [1] |
| PAH | 2.20E-06 | lb/MMBtu | 4.84E-03 | 0.01 | [1] |
| Total | 6.51E-04 | lb/MMBtu | 1.43 | 2.09 | |

- [1] Based on AP-42, Table 3.1-3, Emissions factors for HAP from gas-fired stationary gas turbines.
- [2] Average of stack test results from Kiamichi and Rolling Hills facilities with a 3X compliance margin to reflect site-to-site variability.

Startup and Shutdown Emissions - GE 7FA.04 Gas Turbine

| | Startup | Shutdown | Reference Footnote |
|-------------------------------------|---------|----------|--------------------|
| Est. Number of Events per year | 365 | 365 | [1] |
| Duration of Event (min/event) | 20.0 | 20.0 | [2] |
| Natural Gas Usage per Event (MMBtu) | 246 | 236 | [3], [4] |

- [2] Startup and Shutdown Event Duration from GE
- [3] Gas Usage per Event from GE

TABLE B-7

TRPP

**Tenaska Roan's Prairie Generating Station
Grimes County, Texas
GE 7FA.04 Emissions Calculations**

| Pollutant | Startup | Shutdown | Reference Footnote |
|-----------------|---------|----------|--------------------|
| NO _x | 30.0 | 29.0 | [1] |
| CO | 186.0 | 237.0 | [1] |
| VOC | 15.0 | 21.0 | [1] |
| SO ₂ | 0.34 | 0.33 | [2] |
| PM | 3.4 | 3.4 | [1] |

[1] Emissions per Event from GE

[2] SO₂ emission factor assumed unchanged from maximum operation shown above

| Pollutant | Startup and Shutdown Emissions (lb/hr) | Startup/Shutdown Emissions per turbine (ton/yr) | Reference Footnote |
|-----------------|--|---|--------------------|
| | | | |
| NO _x | 82.00 | 10.77 | [1], [2] |
| CO | 434.00 | 77.20 | [1], [2] |
| VOC | 37.20 | 6.57 | [1], [2] |
| SO ₂ | 1.64 | 0.12 | [1], [2] |
| PM | 9.90 | 1.24 | [1], [2] |

[1] Because the startup and shutdown events are less than 1 hr, the hourly startup and shutdown rates represent the mass of the event for both a startup and shutdown in one Sample calculation:

$$\frac{59.00 \text{ lb NO}_x}{\text{event}} \times \frac{1 \text{ event}}{\text{hr}} + \frac{69.00 \text{ lb NO}_x}{\text{hr}} \times \frac{60 \text{ min}}{60 \text{ min/hr}} - \frac{40.00 \text{ min/hr}}{60 \text{ min/hr}} = \frac{82.00 \text{ lb NO}_x}{\text{hr}}$$

[2] Annual Startup/Shutdown Emissions are calculated at the number of startup or shutdown events per year x the emissions per event.

TABLE B-7

TRPP

**Tenaska Roan's Prairie Generating Station
Grimes County, Texas
GE 7FA.04 Emissions Calculations**

Maximum Hourly Emissions - GE 7FA.04 Gas Turbine

| Pollutant | Emissions from turbine (lb/hr) | Startup and Shutdown Emissions (lb/hr) | Maximum Hourly Emissions (lb/hr) |
|-----------------|--------------------------------|--|----------------------------------|
| NO _x | 69.00 | 82.00 | 82.00 |
| CO | 33.00 | 434.00 | 434.00 |
| VOC | 3.60 | 37.20 | 37.20 |
| SO ₂ | 2.88 | 1.64 | 2.88 |
| PM | 9.30 | 9.90 | 9.90 |

Turbine Heat Input Rating = MMBtu/hr per turbine
 Number of Turbines =

TABLE B-8

TRPP

**Tenaska Roan's Prairie Generating Station
Grimes County, Texas
Emergency Generator Engine Emissions Calculations**

Project: Three (3) Turbines, no base-line case (new facility)

Potential Emissions - Emergency Generator

| Parameter | Value | Units | Source |
|-----------------------------|--------------------------|-----------------|---|
| Manufacturer = | Caterpillar (or similar) | | |
| Generator Model = | 2000 kW | | |
| Engine Model = | 3516C ATAAC | | |
| Serial Number = | TBD | | |
| Fuel Type = | Diesel | | |
| Fuel Density = | 7.001 | lb/gal | Manufacturer's Specification Sheet November 6, 2012 |
| Fuel High Heat Value = | 138,000 | Btu/gal | 40 CFR Part 98 Subpart C, Table C-1 |
| Purpose = | Emergency Generator | | |
| Displacement = | 4,210.64 | in ³ | Manufacturer's Gen Set Package Performance Data [DM 8263] |
| Displacement = | 69 | L | Manufacturer's Gen Set Package Performance Data [DM 8263] |
| Number of Cylinders = | 16 | | Manufacturer's Gen Set Package Performance Data [DM 8263] |
| Engine Rating = | 2,937 | hp | Manufacturer's Gen Set Package Performance Data [DM 8263] |
| Fuel Consumption = | 138.9 | gal/hr | Manufacturer's Gen Set Package Performance Data [DM 8263] |
| Heat Rate = | 19.17 | MMBtu/hr | Fuel Consumption * Fuel High Heat Value |
| Annual Hours of Operation = | 100 | hr/yr | Provided by TENASKA |

| Pollutant | Emission Factor | | Emissions from | Emissions from | Reference Footnote |
|--------------------------------|--|-------------------|----------------|----------------|--------------------|
| | | | Engine (lb/hr) | Engine (tpy) | |
| NO _x +NMHC | 6.4 g/kW-hr | 0.01 lb/hp-hr | 30.91 | 1.55 | [1] |
| CO | 3.5 g/kW-hr | 5.76E-03 lb/hp-hr | 16.91 | 0.85 | [1] |
| VOC (TOC) | | 7.05E-04 lb/hp-hr | 2.07 | 0.10 | [2] |
| SO ₂ | 15 ppmw S | 9.93E-06 lb/hp-hr | 0.03 | 0.00 | [3] |
| PM | 0.20 g/kW-hr | 3.29E-04 lb/hp-hr | 0.97 | 0.05 | [1] |
| PM ₁₀ | 0.20 g/kW-hr | 3.29E-04 lb/hp-hr | 0.97 | 0.05 | [4] |
| PM _{2.5} | 0.20 g/kW-hr | 3.29E-04 lb/hp-hr | 0.97 | 0.05 | [4] |
| H ₂ SO ₄ | 0.10 lb H ₂ SO ₄ /lb SO ₂ | 9.93E-07 lb/hp-hr | 2.92E-03 | 1.46E-04 | [5] |
| Total HAP | 0.0016 lb/MMBtu | 1.03E-05 lb/hp-hr | 0.03 | 1.51E-03 | [6] |
| CO ₂ | 73.96 kg/MMBtu | 1.06 lb/hp-hr | 3,125.45 | 156.27 | [7] |
| CH ₄ | 3.0E-03 kg/MMBtu | 4.32E-05 lb/hp-hr | 0.13 | 0.01 | [7] |
| N ₂ O | 6.0E-04 kg/MMBtu | 8.63E-06 lb/hp-hr | 0.03 | 1.27E-03 | [7] |
| CO ₂ e | | | 3,136.18 | 156.81 | [7] |

TABLE B-8

TRPP

**Tenaska Roan's Prairie Generating Station
Grimes County, Texas
Emergency Generator Engine Emissions Calculations**

Project: Three (3) Turbines, no base-line case (new facility)

[1] Engine will be subject to ICE NSPS (40 CFR Part 60, Subpart IIII) and therefore, subject to Tier 2 emissions limits (40 CFR 89.112) for engines greater than 750 hp. Emission factors are based on Tier 2 limits.

[2] Based on AP-42, Table 3.4-1, Gaseous Emission Factors for Large Stationary Diesel and All Stationary Dual-Fired Engines

[3] SO₂ emissions were estimated using a mass balance calculation based on the use of ultra-low sulfur content fuel and the fuel consumption rate.

Sample calculation:

| | | | | | | | |
|---------------------|-----------------|------------------|----------|---------|-----------------------|---|-----------------------------|
| 15 lb S | 7.001 lb diesel | 138.9 gal diesel | 1 | lbmol S | 64 lb SO ₂ | = | 9.93E-06 lb SO ₂ |
| 1,000,000 lb diesel | gal diesel | hr | 2,937 hp | 32 lb S | lbmol SO ₂ | | hp-hr |

[4] Assumed that PM was PM_{2.5}.

[5] Estimated as 10% of SO₂ emissions

[6] Based on AP-42, Tables 3.4-3 and 3.4-4, Hazardous Air Pollutant Emission Factors for Large Stationary Diesel Engines.

[7] Based on USEPA's Mandatory Reporting Rule, Tables C-1 and C-2. To convert to CO₂e, the following global warming potentials were used - CH₄ = 25, N₂O = 298.

TABLE B-9

TRPP

**Tenaska Roan's Prairie Generating Station
Grimes County, Texas
Emergency Firewater Pump Engine Emissions Calculations**

Project: Three (3) Turbines, no base-line case (new facility)

Potential Emissions - Firewater Pump

| Parameter | Value | Units | Source |
|------------------------------------|----------------------|-----------------|---|
| Manufacturer = | Cummins (or similar) | | |
| Pump Model = | | | |
| Engine Model = | CFP15E-F30 | | |
| Serial Number = | TBD | | |
| Fuel Type = | Diesel | | |
| Fuel Density = | 7.001 | lb/gal | Manufacturer's Specification Sheet November 6, 2012 |
| Fuel High Heat Value = | 138,000 | Btu/gal | 40 CFR Part 98 Subpart C, Table C-1 |
| Purpose = | Firewater Pump | | |
| Displacement = | 915.00 | in ³ | Manufacturer's Specification Sheet CFP15E-F10-F70 (@2100 rpm) |
| Displacement = | 15 | L | Manufacturer's Specification Sheet CFP15E-F10-F70 (@2100 rpm) |
| Number of Cylinders = | 6 | | Manufacturer's Specification Sheet CFP15E-F10-F70 (@2100 rpm) |
| Engine Rating = | 575 | hp | Manufacturer's Specification Sheet CFP15E-F10-F70 (@2100 rpm) |
| Fuel Consumption = | 29.1 | gal/hr | Manufacturer's EPA & CARB Tier 3 Emission Data Sheet March 24, 2010 |
| Heat Rate = | 4.02 | MMBtu/hr | Fuel Consumption * Fuel High Heat Value |
| Annual Hours of Operation = | 100 | hr/yr | Provided by TENASKA |

| Pollutant | Emission Factor | Emissions from Engine (lb/hr) | Emissions from Engine (tpy) | Reference Footnote |
|------------------------------------|--|-------------------------------|-----------------------------|--------------------|
| NO_x+NMHC | 4.0 g/kW-hr | 0.01 lb/hp-hr | 3.78 | [1] |
| CO | | 6.68E-03 lb/hp-hr | 3.84 | [2] |
| VOC (TOC) | | 2.51E-03 lb/hp-hr | 1.45 | [2] |
| SO₂ | 15 ppmw S | 1.06E-05 lb/hp-hr | 0.01 | [3] |
| PM | 0.20 g/kW-hr | 3.29E-04 lb/hp-hr | 0.19 | [1] |
| PM₁₀ | 0.20 g/kW-hr | 3.29E-04 lb/hp-hr | 0.19 | [4] |
| PM_{2.5} | 0.20 g/kW-hr | 3.29E-04 lb/hp-hr | 0.19 | [4] |
| H₂SO₄ | 0.10 lb H ₂ SO ₄ /lb SO ₂ | 1.06E-06 lb/hp-hr | 6.11E-04 | [5] |
| Total HAP | 0.0039 lb/MMBtu | 2.71E-05 lb/hp-hr | 0.02 | [6] |
| CO₂ | 73.96 kg/MMBtu | 1.14 lb/hp-hr | 654.79 | [7] |
| CH₄ | 3.0E-03 kg/MMBtu | 4.62E-05 lb/hp-hr | 0.03 | [7] |
| N₂O | 6.0E-04 kg/MMBtu | 9.24E-06 lb/hp-hr | 0.01 | [7] |
| CO₂e | | | 657.04 | [7] |

TABLE B-9

TRPP

**Tenaska Roan's Prairie Generating Station
Grimes County, Texas
Emergency Firewater Pump Engine Emissions Calculations**

Project: Three (3) Turbines, no base-line case (new facility)

- [1] Engine will be subject to ICE NSPS (40 CFR Part 60, Subpart IIII). Emission factors are based on Table 4 to Subpart IIII.
- [2] Based on AP-42, Table 3.3-1, Emission Factors for Uncontrolled Gasoline and Diesel Industrial Engines
- [3] SO₂ emissions were estimated using a mass balance calculation based on the use of ultra-low sulfur content fuel and the fuel consumption rate.

Sample calculation:

| | | | | | | | |
|---------------------|-----------------|-----------------|--------|---------|-----------------------|---|-----------------------------|
| 15 lb S | 7.001 lb diesel | 29.1 gal diesel | 1 | lbmol S | 64 lb SO ₂ | = | 1.06E-05 lb SO ₂ |
| 1,000,000 lb diesel | gal diesel | hr | 575 hp | 32 lb S | lbmol SO ₂ | | hp-hr |

- [4] Assumed that PM was PM_{2.5}.
- [5] Estimated as 10% of SO₂ emissions
- [6] Based on AP-42, Table 3.3-2, Hazardous Air Pollutant Emission Factors for Uncontrolled Diesel Engines.
- [7] Based on USEPA's Mandatory Reporting Rule, Tables C-1 and C-2. To convert to CO₂e, the following global warming potentials were used - CH₄ = 25, N₂O = 298.

TABLE B-10

TRPP

**Tenaska Roan's Prairie Generating Station
Grimes County, Texas
Fugitive Emissions Calculations**

Project: Three (3) Turbines, no base-line case (new facility)

Potential Emissions - Fugitive Components

| | | |
|--|-------|-------|
| Annual Operating Hours | 8,760 | hr/yr |
| VOC Content of Natural Gas [1] | 1.78 | wt% |
| HAP Content of Natural Gas [2] | 1.78 | wt% |
| CO ₂ Content of Natural Gas [3] | 5.49 | wt% |
| CH ₄ Content of Natural Gas [4] | 100 | wt% |

| Component and Service | Number of Components [5] | Emission Factor [6] | Control Efficiency [7] (%) | Total Emissions | |
|--------------------------------------|--------------------------|-------------------------|-------------------------------|-----------------|-------|
| | | | | lb/hr | tpy |
| Valves | | | | | |
| Gas/Vapor | 936 | 0.0089 lb/hr-component | 97 | 0.25 | 1.09 |
| Light Liquid | 0 | 0.0035 lb/hr-component | 97 | 0 | 0 |
| Heavy Liquid | 0 | 0.0007 lb/hr-component | 97 | 0 | 0 |
| Pumps | | | | | |
| Light Liquid | 0 | 0.0386 lb/hr-component | 93 | 0 | 0 |
| Heavy Liquid | 0 | 0.0161 lb/hr-component | 93 | 0 | 0 |
| Flanges/Connectors | | | | | |
| Gas/Vapor | 2,628 | 0.0029 lb/hr-component | 97 | 0.23 | 1.00 |
| Light Liquid | 0 | 0.0005 lb/hr-component | 97 | 0 | 0 |
| Heavy Liquid | 0 | 0.00007 lb/hr-component | 97 | 0 | 0 |
| Compressors | | | | | |
| Gas/Vapor | 6 | 0.5027 lb/hr-component | 95 | 0.15 | 0.66 |
| Pressure Relief Valves | | | | | |
| Gas/Vapor | 18 | 0.2293 lb/hr-component | 97 | 0.12 | 0.54 |
| Open Ended Lines | | | | | |
| All Liquids | 0 | 0.004 lb/hr-component | 97 | 0 | 0 |
| Total Emissions | | | | 0.75 | 3.30 |
| VOC Emissions [8] | | | | 0.01 | 0.06 |
| HAP Emissions [8] | | | | 0.01 | 0.06 |
| CO₂ Emissions [8] | | | | 0.04 | 0.18 |
| CH₄ Emissions [8] | | | | 0.75 | 3.30 |
| CO₂e Emissions [9] | | | | 18.87 | 82.65 |

TABLE B-10

TRPP

**Tenaska Roan's Prairie Generating Station
Grimes County, Texas
Fugitive Emissions Calculations**

Project: Three (3) Turbines, no base-line case (new facility)

- [1] From Natural Gas Analysis provided by Tenaska on April 12, 2013.
- [2] Conservatively assumed that HAP Content = VOC Content.
- [3] Maximum pipeline specification (2 volume %) converted to weight percent assuming natural gas MW is equal to methane.
- [4] Conservative assumption.
- [5] Number of Components provided via email from Mr. Larry Carlson (Tenaska) on April 12, 2013.
- [6] SOCMI without Ethylene (C₂) Fugitive Equipment Leak Factors from October 2000 Draft TCEQ Technical Guidance Package for Equipment Leak Fugitives.
- [7] Control Efficiency for AVO Program from October 2000 Draft TCEQ Technical Guidance Package for Equipment Leak Fugitives.
- [8] Total Emissions * Content of Natural Gas (wt%)
- [9] Based on USEPA's Mandatory Reporting Rule, Table C-1. To convert to CO₂e, the following global warming potentials were used - CH₄ = 25, N₂O = 298.

TABLE B-11

TRPP

**Tenaska Roan's Prairie Generating Station
Grimes County, Texas
SF6 Circuit Breaker Emissions**

Project: Three (3) Turbines, no base-line case (new facility)

GHG Emissions from SF₆ Insulated Electrical Equipment

Sulfur hexafluoride (SF₆) is used in high voltage electrical equipment as an insulator and/or arc quenching medium. Fugitive emissions of SF₆ may result due to equipment leakage. Because SF₆ is a very potent greenhouse gas its emissions have been included in the facility-wide GHG emission estimation.

| Description of SF ₆ containing equipment | Number of Pieces of Equipment | Weight of SF ₆ per piece of Equipment (lb) | Weight of SF ₆ per Equipment Type (lb) | IEC standard for equipment leakage [1] (% per year) | Fugitive SF ₆ (lb/hr) | Fugitive SF ₆ (ton/yr) | Global Warming Potential [2] | Fugitive CO ₂ e (lb/hr) | Fugitive CO ₂ e (ton/yr) |
|---|-------------------------------|---|---|---|----------------------------------|-----------------------------------|------------------------------|------------------------------------|-------------------------------------|
| Circuit Breakers | 7 | 500 | 3,500 | 0.50% | 0.00200 | 0.00875 | 22,800 | 45.55 | 199.50 |
| TOTAL | | | 3,500 | 0.50% | 0.00200 | 0.00875 | 22,800 | 45.55 | 199.50 |

[1] IEC, International Electrotechnical Commission Standard 62271-1, 2004, assume 100% loss of content upon leakage.

[2] Based on USEPA's Mandatory Reporting Rule, Table A-1.

TABLE B-12

TRPP

**Tenaska Roan's Prairie Generating Station
Grimes County, Texas
MSS Emissions Calculations**

Project: Three (3) Turbines, no base-line case (new facility)

Summary of Potential Emissions - Maintenance Operations

| Pollutant | On-Line Turbine Washing (tpy) | Turbine Filter Changeouts (tpy) | Gaseous Fuel Venting (tpy) | CEMS Calibration (tpy) | Total Maintenance Emissions (tpy) |
|--------------------------------|-------------------------------|---------------------------------|----------------------------|------------------------|-----------------------------------|
| NO _x | - | - | - | 5.97E-07 | 5.97E-07 |
| CO | - | - | - | 3.63E-07 | 3.63E-07 |
| VOC | - | - | 2.05E-03 | - | 2.05E-03 |
| SO ₂ | - | - | - | - | - |
| PM | 0.04 | 4.04E-05 | - | - | 0.04 |
| PM ₁₀ | 0.04 | 1.91E-05 | - | - | 0.04 |
| PM _{2.5} | 0.04 | 2.89E-06 | - | - | 0.04 |
| H ₂ SO ₄ | - | - | - | - | - |
| Lead | - | - | - | - | - |
| CO ₂ | - | - | 0.01 | - | 0.01 |
| CH ₄ | - | - | 0.11 | - | 0.11 |
| N ₂ O | - | - | - | - | - |
| GHG (CO ₂ e) | - | - | 2.88 | - | 2.88 |
| Total HAPs (excluding lead) | - | - | 2.05E-03 | - | 2.05E-03 |
| Formaldehyde | - | - | - | - | - |

TABLE B-12

TRPP

**Tenaska Roan's Prairie Generating Station
Grimes County, Texas
MSS Emissions Calculations**

Potential Emissions - Online Turbine Washing

| |
|-----------------------------------|
| Number of Combustion Turbines = 3 |
|-----------------------------------|

| Input Data (per Combustion Turbine) | | |
|-------------------------------------|----------------------------|--------------------|
| Parameter | Per Combustion Turbine | Reference Footnote |
| Total Turbine Blade Surface Area | 2,000 ft ² | [1] |
| % of Blade Covered by Dust | 5% | [2] |
| Depth of Blade Dust | 2.50 microns | [2] |
| Flue Dust Density | 81.13 lb / ft ³ | [3] |
| Duration of Event | 30.00 mins | [2] |
| Number of Events per Year | 365.00 events / yr | [2] |
| Surface Area Covered by Dust | 100 ft ² | [4] |
| Dust Volume | 8.2021E-04 ft ³ | [5] |
| Dust per Event | 0.07 lb / event | [6] |

[1] Washable surface area of turbine blades provided via email from Mr. Larry Carlson (Tenaska) on April 12, 2013.

[2] Calculation assumptions and input provided by Mr. Larry Carlson (Tenaska) on April 12, 2013.

[3] Flue Dust Density based on the average of representations at (in unit of lb/ft³):

54 http://www.powderandbulk.com/resources/bulk_density/material_bulk_density_chart_f.htm

108.25 http://www.simetric.co.uk/si_materials.htm

[4] Surface Area Covered by Dust = Total Turbine Blade Surface Area * % of blade covered by dust

[5] Dust Volume (ft³) = Surface Area Covered by Dust (ft²) * Depth of Blade Dust (ft)
(2.5 microns = 8.2021E-06 ft)

[6] Dust per Event (lb/event) = Dust Volume (ft³) * Flue Dust Density (lb/ft³)

| Blade Dust Emissions Calculations [1] | | | | |
|---|------------------------|-----------------------------------|---------|--------------------|
| Parameter | Per Combustion Turbine | For Three Combustion Turbines [4] | Units | Reference Footnote |
| Hourly PM/PM ₁₀ /PM _{2.5} Emissions | 0.07 | 0.20 | lb / hr | [2] |
| Annual PM/PM ₁₀ /PM _{2.5} Emissions | 0.01 | 0.04 | tpy | [3] |

[1] Calculation assumes no TDS in deionized water.

[2] Hourly PM/PM₁₀/PM_{2.5} Emissions for One Combustion Turbine (lb/hr) = Dust per Event (lb/event)

[3] Hourly PM/PM₁₀/PM_{2.5} Emissions for One Combustion Turbine (tpy) = Dust per event (lb/event) * 365 (events/yr) / 2000 (lb/ton)

[4] Total PM/PM₁₀/PM_{2.5} Emissions for Three Combustion Turbines = Hourly/Annual PM/PM₁₀/PM_{2.5} Emission Rates * Number of Combustion Turbines

TABLE B-12

TRPP

**Tenaska Roan's Prairie Generating Station
Grimes County, Texas
MSS Emissions Calculations**

Potential Emissions - Turbine Filter Changeouts

| Emission Factors | | | | |
|--|-----------------------|--------|----------|--------------------|
| Parameter | | Value | Units | Reference Footnote |
| Mean Wind Speed | U | 7.15 | mph | [1] |
| Material Moisture Content | M | 1 | % | [2] |
| PM Particle Size Multiplier | K(PM) | 0.74 | | [3] |
| PM ₁₀ Particle Size Multiplier | K(PM ₁₀) | 0.35 | | [3] |
| PM _{2.5} Particle Size Multiplier | K(PM _{2.5}) | 0.053 | | [3] |
| PM Emission Factor | E(PM) | 0.0099 | lb / ton | [4] |
| PM ₁₀ Emission Factor | E(PM ₁₀) | 0.0047 | lb / ton | [4] |
| PM _{2.5} Emission Factor | E(PM _{2.5}) | 0.0007 | lb / ton | [4] |

[1] The Mean Wind Speed for Roan's Prairie, Texas was estimated using the average of the mean wind speeds for Austin and Houston, available in TANKS 4.09d program.

[2] Material Moisture Content is estimated based on process knowledge.

[3] Particle size multipliers are taken from AP-42, Chapter 13.2.4 "Aggregate Handling And Storage Piles".

[4] PM/PM₁₀/PM_{2.5} Emission Factor calculated based on Equation (1) from AP-42, Chapter 13.2.4 "Aggregate Handling And Storage Piles".

$$E = k(0.0032) * ((U/5)^{1.3}) / ((M/2)^{1.4}) \quad (\text{lb / ton})$$

TABLE B-12

TRPP

**Tenaska Roan's Prairie Generating Station
Grimes County, Texas
MSS Emissions Calculations**

| Input Data [1] | | |
|--|---------|-----------------------|
| Parameter | Value | Units |
| Filter Surface Area | 11,000 | ft ² |
| Assumed Dust Thickness before casing is opened | 1 | mm |
| | 0.00328 | ft |
| Assumed Dust Density | 75 | lb/ft ³ |
| Activities per Combustion Turbine per year | 2 | activities/turbine/yr |
| Maximum Number of Combustion Turbines | 3 | for 3 x 1 scenario |
| Duration of Filter Changeouts | 12 | hr / activity |

[1] Calculation assumptions and input confirmed by Mr. Larry Carlson (Tenaska) via email on April 12, 2013

| Filter Changeout Emission Calculations (for three Combustion Turbines) | | | |
|--|----------|--------------|--------------------|
| Parameter | Value | Units | Reference Footnote |
| Activity Throughput | 2,706 | lb/activity | [1] |
| | 1.35 | ton/activity | [1] |
| Hourly Throughput | 0.11 | ton/hr | [2] |
| Hourly PM Emissions | 1.12E-03 | lb/hr | [3] |
| Hourly PM10 Emissions | 5.31E-04 | lb/hr | [3] |
| Hourly PM2.5 Emissions | 8.03E-05 | lb/hr | [3] |
| Annual PM Emissions | 4.04E-05 | tpy | [4] |
| Annual PM10 Emissions | 1.91E-05 | tpy | [4] |
| Annual PM2.5 Emissions | 2.89E-06 | tpy | [4] |

[1] Activity Throughput (lb/activity) = Filter Surface Area (ft²) * Dust Thickness (ft) * Dust Density (lb/ft³)
It is conservatively assumed that no control occurs during filter changeouts

Activity Throughput (ton/activity) = Activity Throughput: lb/activity / 2000 (lb/ton)

[2] Hourly Throughput (ton/hr) = Activity Throughput (ton/activity) / Duration of Filter Changeouts (hr/activity)
It is assumed that one filter changeout activity is performed at a time.

[3] Hourly PM Emissions (lb/hr) = Hourly Throughput (ton/hr) * PM Emission Factor (lb/ton)

[4] Annual PM Emissions (ton/yr) = (Hourly PM Emissions (lb/hr) * Duration of Filter Changeouts (hr/activity) * Activities per year (activities/turbine/yr) *
Number of Turbines (turbines) / 2000 (lb/ton))

TABLE B-12

TRPP

Tenaska Roan's Prairie Generating Station
Grimes County, Texas
MSS Emissions Calculations

Potential Emissions - Gaseous Fuel Venting, Small Equipment and Fugitives

Emissions Calculation [1]

| Piping Description | Initial Conditions | | | | Final Conditions | | | | Activity | VOC Emissions | |
|---|---|---|--------------------|---------------------|-----------------------------|------------------------------|--------------------------------|---------------------|----------|-------------------|----------------|
| | Max Hourly Volume [2] Vi (ft ³) | Annual Volume [2] Vi (ft ³) | Pressure Pi (psia) | Temperature Ti (°F) | Standard Pressure Pf (psia) | Standard Temperature Tf (°F) | Max Hourly Volume [3] Vf (scf) | Volume [3] Vf (scf) | | Frequency (hr/yr) | Hourly (lb/hr) |
| Fuel Line | 83 | 1,146 | 64.7 | 50 | 14.7 | 68 | 378.2 | 5,222.0 | 30 | 0.29 | 2.04E-03 |
| Small Equipment | 0.7 | 6.7 | 64.7 | 50 | 14.7 | 68 | 3.2 | 30.5 | 10 | 0.0025 | 1.19E-05 |
| Total VOC Emissions: | | | | | | | | | | 0.30 | 2.05E-03 |
| Total HAP Emissions: | | | | | | | | | | 0.30 | 2.05E-03 |
| Total CO₂ Emissions: | | | | | | | | | | 0.92 | 0.01 |
| Total CH₄ Emissions: | | | | | | | | | | 16.70 | 0.11 |
| Total CO₂e Emissions: | | | | | | | | | | 418.43 | 2.88 |

[1] Emission input data confirmed by Mr. Larry Carlson (Tenaska) on April 12, 2013

[2] Initial volumes of lines and gas condition provided by Mr. Larry Carlson(Tenaska)

[3] Final volume is calculated using Ideal Gas Law

[4] Additional assumptions:

- Natural Gas Mw: 16.87 lb/lb-mole (From Natural Gas Analysis provided by Tenaska on April 12, 2013)
 - VOC Content of Natural Gas 1.78% by Wt. (From Natural Gas Analysis provided by Tenaska on April 12, 2013)
 - HAP Content of Natural Gas 1.78% by Wt. (Conservatively assumed that HAP Content = VOC Content.)
 - CO₂ Content of Natural Gas 5.49% by Wt. (Maximum pipeline specification (2 volume %) converted to weight percent assuming natural gas MW is equal to methane)
 - CH₄ Content of Natural Gas 100.00% by Wt. (Conservative assumption)
 - Molar Volume of Gas 385.27 scf/lb-mol (Based on Ideal Gas Law at Standard Pressure and Temperature - 14.7 psia and 68 °F)
- Based on USEPA's Mandatory Reporting Rule, Table C-1. To convert to CO₂e, the following global warming potentials were used - CH₄ = 21, N₂O = 310.

Example Calculation for Fuel Line:

$$\text{Hourly Emissions (lb/hr)} = \frac{378.2 \text{ scf}}{\text{hr}} \times \frac{\text{lb-mole}}{385.27 \text{ scf}} \times \frac{16.80 \text{ lb NG}}{\text{lb-mole}} \times \frac{0.0178 \text{ lb VOC}}{\text{lb Nat Gas}} = 0.29 \text{ lb/hr}$$

$$\text{Annual Emissions (tpy)} = \frac{5,222 \text{ scf}}{\text{yr}} \times \frac{\text{lb-mole}}{385.27 \text{ scf}} \times \frac{16.80 \text{ lb NG}}{\text{lb-mole}} \times \frac{0.0178 \text{ lb VOC}}{\text{lb Nat Gas}} \times \frac{1 \text{ ton}}{2,000 \text{ lb}} = 0.0020 \text{ ton/yr}$$

Recently Issued Permits and Pending Applications
Appendix C

March 3, 2014
Project No. 0189555

Environmental Resources Management
CityCentre Four
840 West Sam Houston Parkway North, Suite 600
Houston, Texas 77024-3920
(281) 600-1000

TABLE C-1

TRPP

Tenaska Roans Prairie Generating Station
Grimes County, TX

Recently Issued Permits and Applications Under Review for Greenhouse Gases from Combustion Turbines

| No. | Permit Authority | Permit Number | Company Name Facility Name Location | # | Unit Description Model | Capacity | | Control Technology | Thermal Efficiency BTU (HHV) per kW-hr (gross) | PTE | | Proposed BACT Limits | | Monitoring | | | | | | | | |
|----------------------|----------------------|-----------------|---|---|---------------------------|------------|----------------|---|--|-----------------------|-----------|--|---|---------------------|----------------------------|-----------|-------|---------------------|-----------|-----------|------|---------------------|
| | | | | | | | | | | tpy CO ₂ e | Parameter | Units | | | | | | | | | | |
| 1 | USEPA R9 | SD 11-01 | Pio Pico Energy Center, LLC Pio Pico Energy Center CA | 3 | GE LMS100 | 100 | MW | Simple cycle operation | N/A | N/A | 1,328 | lb/MWh | None proposed | | | | | | | | | |
| 2 | USEPA R3 | 67-05009C | York Plant Holdings, LLC York Generation Facility PA | 2 | N/A | 634 | MMBtu/hr | Simple cycle operation Post combustion controls Fuel selection | N/A | N/A | 1,330 | lb/MWh | None proposed | | | | | | | | | |
| 3 | USEPA R6 | PSD-LA-703(M03) | Sabine Pass LNG, LP & Sabine Pass Liquefaction, LL Sabine Pass LNG Terminal LA | 2 | GE LM2500+G4 | 286 | MMBtu/hr | Simple cycle operation Good combustion practices Fueled by natural gas | N/A | 4,872,107 | 4,872,107 | tpy CO ₂ e | None proposed | | | | | | | | | |
| 4 | USEPA R6 | PSD TX1290 | EI Paso Electric Company Montana Power Station El Paso, TX | 4 | GE LMS100 | 100 | MW | Efficient design Evaporative cooling Good operating practices Fuel selection | 9,074 | 227,840 | 227,840 | tpy CO ₂ e | Fuel quality monitoring | | | | | | | | | |
| 5 | USEPA R9 | SE 09-01 | City of Palmdale Palmdale Hybrid Power Project CA | 2 | GE 7FA | 154 | MW | Combined cycle operation | N/A | N/A | 774 | lb/MWh | None proposed | | | | | | | | | |
| 6 | USEPA R5 | 81-11 | Wolverine Power Supply Cooperative Inc. Sumpter Power Plant MI | 1 | GE PG7121 | 130 | MW | Combined cycle operation | N/A | N/A | 954 | lb/MWh | None proposed | | | | | | | | | |
| 7 | USEPA R3 | 55-00001E | Sunbury Generation LP Sunbury Generation LP/Sunbury SES PA | 3 | N/A | N/A | N/A | Combined cycle operation | N/A | N/A | 281,727 | lb/hr | None proposed | | | | | | | | | |
| 8 | USEPA R3 | 52375-002 | Gateway Green Energy Gateway Cogeneration 1, LLC - Smart Water Project VA | 2 | Rolls Royce Trent 60 WLE | 593 | MMBtu/hr | Combined cycle operation | N/A | 295,961 | 295,961 | tpy CO ₂ e | None proposed | | | | | | | | | |
| 9 | USEPA R3 | 08-00045A | Moxie Energy LLC Moxie Liberty LLC/Asylum Power Plt PA | 2 | N/A | 2,890 | MMBtu/hr | Good combustion practices Fueled by natural gas Efficient design | N/A | 1,480,086 | 1,480,086 | tpy CO ₂ e | None proposed | | | | | | | | | |
| Applications Pending | | | | | | | | | | | | | | | | | | | | | | |
| 10 | USEPA R6 | N/A | Calhoun Port Authority ES Joslin Power Station Point Comfort, TX | 3 | GE 7FA | 208 | MW | Combined cycle operation Efficient design Evaporative cooling Steam turbine bypass | N/A | N/A | 7,730 | Btu/kWh (HHV) | N/A | | | | | | | | | |
| 11 | USEPA R6 | N/A | Calpine Corporation Deer Park Energy Center Dallas, TX | 1 | Siemens 501F | 180 725 | MW MMBtu/hr | Combined cycle operation Efficient design Process monitoring | N/A | N/A | 7,730 | Btu/kWh (HHV) | N/A | | | | | | | | | |
| 12 | USEPA R6 | N/A | Copano Processing, LP Houston Central Gas Plant Sheridan, TX | 2 | Solar Mars 100 | 15,000 | hp | Efficient design Waste heat recovery Process monitoring | N/A | 58,672 | 1.16 | ton CO ₂ e/MMscf compressed | monitoring AFR monitoring Quarterly source test | | | | | | | | | |
| 13 | USEPA R6 | N/A | DCP Midstream, LP Hardin County NGL Fractionation Plant Hardin County, TX | 2 | Solar Saturn T-4700 | 43 | MMBtu/hr | Efficient design Waste heat recovery Process monitoring | N/A | 24,610 | 24,610 | tpy CO ₂ e | None proposed | | | | | | | | | |
| 14 | USEPA R6 | N/A | DCP Midstream, LP Jefferson County NGL Fractionation Plant Jefferson County, TX | 2 | Solar Saturn T-4700 | 43 | MMBtu/hr | Efficient design Waste heat recovery Process monitoring | N/A | 24,610 | 24,610 | tpy CO ₂ e | None proposed | | | | | | | | | |
| 15 | USEPA R6 | N/A | Exelon Generation Mountain Creek Steam Electric Station Dallas, TX | 2 | Siemens SGT6-5000F(4) | 232 | MW | Efficient design Good combustion practices Good operating practices Fuel selection | 8,809 | 981,191 | 981,191 | tpy CO ₂ e tpy CO ₂ 18.49 tpy CH ₄ 1.85 tpy N ₂ O | Flow meter and CEMS | | | | | | | | | |
| 16 | USEPA R6 | N/A | Freeport LNG Development Liquefaction Plant Freeport, TX | 1 | GE Frame 7EA | 87 | MW | Efficient design Waste heat recovery Evaporative cooling | N/A | 562,693 | 562,693 | 562,141 tpy CO ₂ 0.03 tpy CH ₄ 1.06 tpy N ₂ O | Fuel monitoring or CEMS | | | | | | | | | |
| 17 | USEPA R6 | N/A | Golden Spread Electric Cooperative, Inc. GSEC Floydada Station Dallas, TX | 1 | GE 7F 5-Series | 202 | MW | Efficient design | N/A | 538,754 | 538,754 | 532,007 tpy CO ₂ 124.97 tpy CH ₄ 13.3 tpy N ₂ O | None proposed | | | | | | | | | |
| 18 | USEPA R6 | N/A | Golden Spread Electric Cooperative, Inc. Antelope Station Abernathy, Texas | 1 | GE 7F 5-Series | 202 | MW | Efficient design | N/A | 538,754 | 538,754 | 532,007 tpy CO ₂ 124.97 tpy CH ₄ 13.3 tpy N ₂ O | None proposed | | | | | | | | | |
| 19 | USEPA R6 | N/A | La Paloma Energy Center, LLC La Paloma Energy Center Harlingen, TX | 2 | GE F7FA | 183 | MW | Energy Efficiency, Practices and Designs | 7,528 | 1,300,674 | 1,299,423 | 24.10 | 2.40 | tpy CO ₂ | Fuel monitoring or CEMS | | | | | | | |
| | | | | | Siemens SGT6-5000F(4) | 265 | MW | | | | | | 7,649 | 1,451,772 | | 1,450,376 | 26.80 | tpy CO ₂ | | | | |
| | | | | | Siemens SGT6-5000F(5) | 271 | MW | | | | | | | | | | | 7,720 | 1,642,317 | 1,640,737 | 2.70 | tpy CH ₄ |
| | | | | | | | | | | | | | | | | | | | | | | tpy CO ₂ |
| | | | | | | | | | | | | | | | | | | | | | | 30.40 |
| 3.00 | tpy N ₂ O | | | | | | | | | | | | | | | | | | | | | |

TABLE C-2

TRPP

Tenaska Roans Prairie Generating Station
Grimes County, TX

Recently Issued Permits and Applications Under Review for Greenhouse Gases from Fugitive Sources

| <u>RBLC ID</u> | <u>Facility Name</u> | <u>Permit Issuance Date</u> | <u>Process Name</u> | <u>Pollutant</u> | <u>Control Method Description</u> | <u>Emission Limit</u> | <u>Emission Limit Unit</u> | <u>Emission Limit Average Time Condition</u> |
|----------------|--------------------------------|-----------------------------|---------------------------------------|----------------------------------|--|-----------------------|----------------------------|--|
| NA | | NA | Fugitive Emissions | Carbon Dioxide Equivalent (CO2e) | AVO Program | 94 | tons/yr | NA |
| TX-0612 | THOMAS C. FERGUSON POWER PLANT | 11/10/2011 | Fugitive Natural Gas emissions_NG-FUG | Carbon Dioxide Equivalent (CO2e) | None | 327.2 | tons/yr | 365 day rolling average |
| LA-0257 | SABINE PASS LNG TERMINAL | 12/6/2011 | FUGITIVE EMISSIONS | Carbon Dioxide Equivalent (CO2e) | CONDUCT A LEAK DETECTION AND REPAIR (LDAR) PROGRAM | 89,629 | TONS/YR | ANNUAL MAXIMUM |

TABLE C-3

TRPP

Tenaska Roans Prairie Generating Station
Grimes County, TX

Recently Issued Permits and Applications Under Review for Greenhouse Gases from Emergency Generators

| RBLC ID | Facility Name | Permit Issuance Date | Process Name | Pollutant | Control Method Description | Emission Limit | Emission Limit Unit | Emission Limit Average Time Condition |
|----------|---|----------------------|------------------------------------|----------------------------------|----------------------------|----------------|---------------------|---------------------------------------|
| *IA-0105 | IOWA FERTILIZER COMPANY | 10/26/2012 | EMERGENCY GENERATOR | Carbon Dioxide | GOOD COMBUSTION PRACTICES | 1.55 | G/KW-H | AVERAGE OF 3 STACK TEST RUNS |
| *IA-0105 | IOWA FERTILIZER COMPANY | 10/26/2012 | FIRE PUMP | Carbon Dioxide | GOOD COMBUSTION PRACTICES | 1.55 | G/KW-H | AVERAGE OF 3 STACK TEST RUNS |
| *VA-0319 | GATEWAY COGENERATION 1, LLC - SMART WATER PROJECT | 8/27/2012 | FIRE WATER PUMP | Carbon Dioxide Equivalent (CO2e) | FUEL-EFFICIENT DESIGN | 30.5 | T/YR | 12 MO ROLLING AVG |
| *IA-0105 | IOWA FERTILIZER COMPANY | 10/26/2012 | FIRE PUMP | Carbon Dioxide Equivalent (CO2e) | GOOD COMBUSTION PRACTICES | 91 | TONS/YR | ROLLING 12 MONTH TOTAL |
| GA-0147 | PYRAMAX CERAMICS, LLC - KING'S M:U FACILITY | 1/27/2012 | 500 KW EMERGENCY DIESEL GENERATORS | Carbon Dioxide Equivalent (CO2e) | | 153 | T/12-MO ROLLING AVG | COMBINED EMISSIONS |
| *IA-0105 | IOWA FERTILIZER COMPANY | 10/26/2012 | EMERGENCY GENERATOR | Carbon Dioxide Equivalent (CO2e) | GOOD COMBUSTION PRACTICES | 788.5 | TONS/YR | ROLLING 12 MONTH TOTAL |

TABLE C-4

TRPP

Tenaska Roans Prairie Generating Station
Grimes County, TX

Recently Issued Permits and Applications Under Review for Greenhouse Gases from SF6 Circuit Breakers

| RBL ID | Facility Name | Permit Issuance Date | Process Name | Pollutant | Control Method Description | Emission Limit | Emission Limit Unit | Emission Limit Average Time Condition |
|----------|---|----------------------|--|----------------------------------|--|----------------|---------------------|---------------------------------------|
| *CA-1212 | PALMDALE HYBRID POWER PROJECT | 10/18/2011 | ENCLOSED PRESSURE SF6 CIRCUIT BREAKERS | Carbon Dioxide Equivalent (CO2e) | | 9.56 | TPY | 12-MONTH ROLLING TOTAL |
| *VA-0319 | GATEWAY COGENERATION 1, LLC - SMART WATER PROJECT | 8/27/2012 | ELECTRIC CIRCUIT BREAKERS, (4) | Carbon Dioxide Equivalent (CO2e) | ENCLOSED PRESSURE CIRCUIT BREAKER. | 28.6 | T/YR | 12 MO AVG |
| *CA-1223 | PIO PICO ENERGY CENTER | 11/19/2012 | CIRCUIT BREAKERS | Carbon Dioxide Equivalent (CO2e) | INSTALL, OPERATE, AND MAINTAIN ENCLOSED PRESSURE SF6 CIRCUIT BREAKERS WITH A MAXIMUM ANNUAL LEAKAGE RATE OF 0.5% BY WEIGHT | 40.2 | TPY | TONS PER CALENDAR YEAR |

Supporting Documentation
Appendix D

March 3, 2014
Project No. 0189555

Environmental Resources Management
CityCentre Four
840 West Sam Houston Parkway North, Suite 600
Houston, Texas 77024-3920
(281) 600-1000

SIEMENS

**Total Estimated Simple Cycle Startup and Shutdown Emissions and Fuel Use
 SGT6-5000F(5)ee ULN on Natural Gas @ 59 °F**

| Mode | Fuel | Ramp Rate (MW/min) | ~ Time (minutes) | Total Pounds per Event | | | | | | | | |
|--------------------------------------|------|--------------------|------------------|------------------------|-----|-----------------|-----------------|-----------------|------|-------|-----|----------|
| | | | | NO _x | CO | CO ₂ | SO ₂ | SO ₃ | VOC | UHC | PM | Fuel Use |
| Total - GT Ignition to 100% GT Load | Gas | 13.4 | 22.3 | 38.6 | 482 | 50,889 | 0.26 | 0.03 | 53.6 | 107.2 | 2.8 | 19,034 |
| Total - 100% GT Load to Fuel Cut Off | | | 17.3 | 36.5 | 364 | 48,679 | 0.25 | 0.03 | 40.2 | 80.3 | 2.4 | 18,143 |
| Total - GT Ignition to 100% GT Load | | 30 | 12.7 | 18.4 | 280 | 23,954 | 0.13 | 0.02 | 31.4 | 62.7 | 1.4 | 8,995 |
| Total - 100% GT Load to Fuel Cut Off | | | 7.7 | 16.3 | 163 | 21,743 | 0.11 | 0.01 | 17.9 | 35.9 | 1.1 | 8,104 |

General Notes

- 1.) All data is ESTIMATED, NOT guaranteed and is for ONE unit.
- 2.) Gas fuel must be in compliance with Siemens fuel specifications.
- 3.) Emissions are at the exhaust stack outlet and exclude ambient air contributions.
- 4.) Emissions are based on new and clean conditions.
- 5.) Gas fuel composition is 98% CH₄, 0.6% C₂H₆, 1.4% N₂ and 0.2 gr S/100 scf.
- 6.) NO_x as NO₂.
- 7.) VOC consist of total hydrocarbons excluding methane and ethane. VOC and UHC are expressed in terms of methane (CH₄).
- 8.) Particulates are per US EPA Method 5/202 (front and back half).
- 9.) Estimated fuel use data is based on a heating value of ~23,140 Btu/lb_m (HHV) and will be different for different heating values.
- 10.) Please be advised that the information contained in this transmittal has been prepared and is being transmitted per customer request specifically for information purposes only. Data to be included in any permit application or Environmental Impact Statement are strictly the customer's responsibility. Siemens is available to review these documents upon request.

Startup Emissions Notes

- 1.) Estimated startup (SU) data are from gas turbine (GT) ignition through 100% load.
- 2.) Estimated SU and shutdown (SD) data are based on the assumed times noted above and will be higher for longer times.
- 3.) Estimated SU and SD data are based on the ambient temperature noted above and will be higher at lower ambient temperatures.
- 4.) Total SU time includes 5 minutes from turning gear to synchronization.
- 5.) SD assumes 100% load to FSNL with no cooldown at FSNL.
- 6.) Continuous Emissions Monitoring System (CEMS) may calculate emissions differently.
- 7.) Operator actions do not extend startup or shutdown.
- 8.) It is assumed that there is no restriction from the interconnected utility for loading the GT from synchronization to 100% load within the SU times considered.

Siemens Energy, Inc.

ERM
 Texas Registered Engineering Firm F-2393

2/14/2013

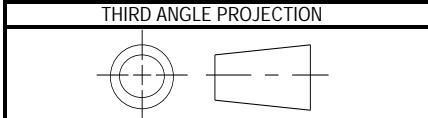
Page 2 of 11

Proprietary Information

0189555\
 A5469 D.1 CO2 Efficiency Limit Calcs.pdf

TRPP
Grimes County Peaking Unit
Grimes County, Texas
GE Start-up Information

| | | | |
|------------------|---------------------------|----------------|-----------------|
| SIZE A | DWG NO 329A5370 | SH 1 | REV I |
|------------------|---------------------------|----------------|-----------------|



| REV STATUS OF SHEETS | | | |
|----------------------|-----|----|-----|
| SH | REV | SH | REV |
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| 2 | I | | |
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| REVISIONS | | | |
|-----------|---|------------|----------|
| REV | DESCRIPTION | DATE | APPROVED |
| A | Startup Emissions Included | 09/07/17 | DRT |
| | Updated GT Cycle | | JCT |
| B | Added Fuel Burn, MW*hrs, Shutdown | 09/11/06 | DRT |
| | Updated Tex to HRSG | | JCT |
| C | Updated with Mode6.2 Emissions | 10/06/10 | DRT |
| | | | JCT |
| D | Updated with 7FA05_0910 GTP Performance | 11/01/07 | DRT |
| E | Updated with 7FA05_0810 GTP Performance | 08/31/2011 | DRT |
| | Updated with Mode 6.3R, 6.3L, and Mode3 accel Emissions | | |
| F | Notes Update, Accel UHC Update | 09/23/2011 | DRT |
| G | Emissions Updated per TG5B | 3/15/2012 | DRT |
| H | Accel/Decel emissions update | 4/27/2012 | DRT |
| | Renamed from Traditional to Conventional Start | | |
| I | Updated Emissions from Factory Test (TS7) | 5/2/2013 | AJF |

Notes:
 1. Approved for External use
 2. These estimates are for reference only and are not guaranteed.
 3. Reference: EED GTT-7FA.05-1011
 4. This start profile does not account for BOP /ST driven delays, such as Steam Temperature Matching or fuel heating
 5. Fuel: 100% Methane (LHV = 21515 BTU/lbm)
 6. Values contained within reflect 99 percentile of fleet projections
 7. Blank
 8. If emissions commitments are being made, appropriate margin should be added to reflect plant operational variation and measurement uncertainty
 9. These projections reflect emissions at the GT exit
 10. VOC defined as Non-methane organic compound, and is assumed as 0.2x of UHC. Conversion from VOC concentration to lbm/event assumes molecular weight of 16.

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 OTHERS, EXCEPT WITH THE WRITTEN PERMISSION OF
 GENERAL ELECTRIC COMPANY.

| ITEM | DESCRIPTION | DWG. NO. |
|--|-------------|----------|
| LIST OF COMPLEMENTARY DOCUMENTS | | |
| | | |
| | | |

| | | | | | |
|---|-------------------------|----------|---|-----------|---------------------------|
| UNLESS OTHERWISE SPECIFIED DIMENSIONS ARE IN INCHES TOLERANCES ON: 2 PL DECIMALS ± 3 PL DECIMALS ± ANGLES ± FRACTIONS ± | SIGNATURES | DATE | GENERAL ELECTRIC COMPANY | | |
| | DRAWN Daniel R Tegel | 09/06/25 | g GE ENERGY GREENVILLE, SC | | |
| | CHECKED Jason Terry | 09/06/25 | | | |
| | ENGRG Daniel R Tegel | 09/06/25 | 7FA.05 Simple/Combined Cycle – Gas – GT Conventional Start | | |
| ISSUED Michael E. Wyatt | 09/06/29 | | | | |
| APPLIED PRACTICES | | | FIRST MADE FOR: ML- GN0018 | ML | |
| | | | SIZE A | CAGE CODE | DWG NO 329A5370 |
| | | | SCALE | | SHEET 1 |
| | SIM TO: NONE | | | | |

DT - 1N

US EPA ARCHIVE DOCUMENT

TRPP
Grimes County Peaking Unit
Grimes County, Texas
GE Start-up Information

| | | | |
|------|----------|----|-----|
| SIZE | DWG NO | SH | REV |
| A | 329A5370 | 2 | 1 |



7FA.05 Simple/Combined Cycle - Gas - GT Conventional Start
12.5%/min accel rate / 17.8MW/min load rate (nominal)

| -20F Ambient Temp | Mol Weight | Units | TG to FSNL | TG to 50% BL | TG to 100% BL |
|-------------------|------------|-------------|------------|--------------|---------------|
| NOx | 46.01 | lbm/event | 7.5 | 27 | 34 |
| CO | 28.01 | lbm/event | 67 | 194 | 198 |
| UHC | 16.04 | lbm/event | 40 | 74 | 75 |
| VOC | 16.04 | lbm/event | 8.1 | 15 | 15 |
| Fuel Flow | -- | MMBTU/event | 30 | 123 | 292 |
| Output | -- | MW*hrs | 0 | 5.9 | 23 |
| 20F Ambient Temp | Mol Weight | Units | TG to FSNL | TG to 50% BL | TG to 100% BL |
| NOx | 46.01 | lbm/event | 8.0 | 23 | 29 |
| CO | 28.01 | lbm/event | 66 | 158 | 161 |
| UHC | 16.04 | lbm/event | 38 | 61 | 63 |
| VOC | 16.04 | lbm/event | 7.6 | 12 | 13 |
| Fuel Flow | -- | MMBTU/event | 29 | 124 | 293 |
| Output | -- | MW*hrs | 0 | 6.1 | 24 |
| 59F Ambient Temp | Mol Weight | Units | TG to FSNL | TG to 50% BL | TG to 100% BL |
| NOx | 46.01 | lbm/event | 8.4 | 22 | 28 |
| CO | 28.01 | lbm/event | 65 | 140 | 143 |
| UHC | 16.04 | lbm/event | 35 | 52 | 53 |
| VOC | 16.04 | lbm/event | 7.1 | 10 | 11 |
| Fuel Flow | -- | MMBTU/event | 27 | 113 | 265 |
| Output | -- | MW*hrs | 0 | 5.5 | 22 |
| 100F Ambient Temp | Mol Weight | Units | TG to FSNL | TG to 50% BL | TG to 100% BL |
| NOx | 46.01 | lbm/event | 8.4 | 20 | 24 |
| CO | 28.01 | lbm/event | 63 | 108 | 110 |
| UHC | 16.04 | lbm/event | 33 | 45 | 46 |
| VOC | 16.04 | lbm/event | 6.7 | 9 | 9 |
| Fuel Flow | -- | MMBTU/event | 26 | 98 | 222 |
| Output | -- | MW*hrs | 0 | 4.3 | 17 |
| 120F Ambient Temp | Mol Weight | Units | TG to FSNL | TG to 50% BL | TG to 100% BL |
| NOx | 46.01 | lbm/event | 8.5 | 20 | 24 |
| CO | 28.01 | lbm/event | 63 | 99 | 101 |
| UHC | 16.04 | lbm/event | 32 | 43 | 44 |
| VOC | 16.04 | lbm/event | 6.5 | 9 | 9 |
| Fuel Flow | -- | MMBTU/event | 24 | 88 | 196 |
| Output | -- | MW*hrs | 0 | 3.6 | 14 |

TG = Turning Gear

FSNL = Full Speed No Load

BL = Baseload

Mol Weight = Assumed Molecular Weight

TG-FSNL does not include duration at FSNL

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GENERAL ELECTRIC COMPANY.

| | | | | |
|--------------------------|------------------|----------|-----------|----------|
| GENERAL ELECTRIC COMPANY | | SIZE | CAGE CODE | DWG NO |
| g GE ENERGY | GREENVILLE, SC | A | | 329A5370 |
| DRAWN | Daniel R Tegel | SCALE | | SHEET 2 |
| ISSUED | Michael E. Wyatt | | | |



US EPA ARCHIVE DOCUMENT

TRPP
 Grimes County Peaking Unit
 Grimes County, Texas
 GE Start-Up Information

7FA.04 Emissions Startup Summary

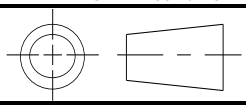
| Traditional Startup Estimated Emissions | | | | |
|---|-------------|------------|-----------|------------|
| | | TG to FSNL | TG to 50% | TG to 100% |
| NOx | lb/event | 4.3 | 19 | 24 |
| CO | lb/event | 49 | 178 | 183 |
| UHC | lb/event | 9.7 | 55 | 56 |
| VOC | lb/event | 4.0 | 13 | 13 |
| Fuel | MMBtu/event | 20 | 95 | 246 |
| Output | MWh | 0.0 | 5.2 | 21 |

*Ambient conditions for above are sea level, 59F/60%RH
 Lightoff to FSNL mass (NOx, CO and UHC) from Combustion Quoting Limits dated Nov-12

IPS- Project 1 : - 7FA.04-1112 1 Version Code- 4.2.3c/347/7FA.04-1112

TRPP
Grimes County Peaking Unit
Grimes County, Texas
GE Shutdown Information

| | | | |
|------------------|---------------------------|----------------|-----------------|
| SIZE A | DWG NO 329A5375 | SH 1 | REV 1 |
|------------------|---------------------------|----------------|-----------------|



REVISIONS

| REV | DESCRIPTION | DATE | APPROVED |
|-----|--|------------|------------|
| -- | Original issue | 09/11/06 | DRT JCT |
| A | Updated with Mode6.2 Emissions | 10/06/10 | DRT JCT |
| B | Updated with 7FA05-0910 GTP Performance | 11/01/06 | DRT |
| C | Updated with 7FA05_0811 GTP performance Updated with Mode6.3R, 6.L, and Mode3 accel emissions | 08/31/2011 | DRT |
| D | Notes Update, Accel UHC update | 09/23/2011 | DRT |
| E | Emissions Updated per TG5B | 03/15/2012 | DRT |
| F | Accel/Decel Emissions Update Renamed from Traditional to Conventional Shutdown | 04/27/2012 | DRT |
| G,H | Not Used | | |
| I | Updated Emissions from Factory Test (TS7) | 05/03/2013 | AJF |

REV STATUS OF SHEETS

| SH | REV | SH | REV |
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Notes:

- 1. Approved for External use
- 2. These estimates are for reference only and are not guaranteed,
- 3. Reference: EED GTT-7FA.05-1011
- 4. This shutdown profile does not account for BOP/ST driven delays such as
Steam temperature matching or fuel heating
- 5. Fuel: 100% Methane (LHV = 21515 BTU/lbm)
- 6. Values contained within reflect 99 percentile of fleet projections
- 7. Blank
- 8. If emissions commitments are being made, appropriate margin should
be added to reflect plant operational variation and measurement uncertainty
- 9. These projections reflect emissions at the GT exit
- 10. VOC defined as Non-methane organic compound, and is assumed as 0.2x
of UHC. Conversion from VOC concentration to lbm/event assumes
molecular weight of 16.

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GENERAL ELECTRIC COMPANY.

| ITEM | DESCRIPTION | DWG. NO. |
|---------------------------------|-------------|----------|
| LIST OF COMPLEMENTARY DOCUMENTS | | |

| | | | | | |
|---|---------------------------|------------------|--|-----------|---------------------------|
| UNLESS OTHERWISE SPECIFIED DIMENSIONS ARE IN INCHES TOLERANCES ON: 2 PL DECIMALS ± 3 PL DECIMALS ± ANGLES ± FRACTIONS ± | DRAWN Daniel R Tegel | DATE 09/11/06 | g GE ENERGY GREENVILLE, SC | | |
| | CHECKED Jason Terry | 09/11/06 | | | |
| | ENGRG Daniel R Tegel | 09/11/06 | 7FA.05 Simple/Combined Cycle – Gas – GT Conventional Shutdown | | |
| | ISSUED Dennis J. Varga | 09/11/06 | FIRST MADE FOR: ML- GN0018 ML | | |
| | QA | | SIZE A | CAGE CODE | DWG NO 329A5375 |
| APPLIED PRACTICES | | SIM TO: NONE | SCALE | SHEET | 1 |

DT - 1N

US EPA ARCHIVE DOCUMENT

TRPP
Grimes County Peaking Unit
Grimes County, Texas
GE Shutdown Information

| | | | |
|------|----------|----|-----|
| SIZE | DWG NO | SH | REV |
| A | 329A5375 | 2 | 1 |



7FA.05 Simple/Combined Cycle - Gas - GT Conventional Shutdown
12.5%/min decel rate / 17.8MW/min unload rate (nominal)

| -20F Ambient Temp | Mol Weight | Units | FSNL to TG | 50% BL to TG | 100% BL to TG |
|-------------------|------------|-------------|------------|--------------|---------------|
| NOx | 46.01 | lbm/event | 4.1 | 21 | 28 |
| CO | 28.01 | lbm/event | 81 | 189 | 193 |
| UHC | 16.04 | lbm/event | 64 | 96 | 97 |
| VOC | 16.04 | lbm/event | 13 | 19 | 19 |
| Fuel Flow | -- | MMBTU/event | 12 | 98 | 267 |
| Output | -- | MW*hrs | 0 | 5.9 | 23 |
| 20F Ambient Temp | Mol Weight | Units | FSNL to TG | 50% BL to TG | 100% BL to TG |
| NOx | 46.01 | lbm/event | 4.2 | 17 | 23 |
| CO | 28.01 | lbm/event | 83 | 164 | 167 |
| UHC | 16.04 | lbm/event | 66 | 89 | 90 |
| VOC | 16.04 | lbm/event | 13 | 18 | 18 |
| Fuel Flow | -- | MMBTU/event | 12 | 100 | 269 |
| Output | -- | MW*hrs | 0 | 6.1 | 24 |
| 59F Ambient Temp | Mol Weight | Units | FSNL to TG | 50% BL to TG | 100% BL to TG |
| NOx | 46.01 | lbm/event | 4.2 | 16 | 21 |
| CO | 28.01 | lbm/event | 84 | 148 | 151 |
| UHC | 16.04 | lbm/event | 68 | 83 | 84 |
| VOC | 16.04 | lbm/event | 14 | 17 | 17 |
| Fuel Flow | -- | MMBTU/event | 12 | 91 | 243 |
| Output | -- | MW*hrs | 0 | 5.5 | 22 |
| 100F Ambient Temp | Mol Weight | Units | FSNL to TG | 50% BL to TG | 100% BL to TG |
| NOx | 46.01 | lbm/event | 4.2 | 14 | 18 |
| CO | 28.01 | lbm/event | 84 | 122 | 124 |
| UHC | 16.04 | lbm/event | 67 | 77 | 78 |
| VOC | 16.04 | lbm/event | 13 | 15 | 16 |
| Fuel Flow | -- | MMBTU/event | 12 | 78 | 203 |
| Output | -- | MW*hrs | 0 | 4.3 | 17 |
| 120F Ambient Temp | Mol Weight | Units | FSNL to TG | 50% BL to TG | 100% BL to TG |
| NOx | 46.01 | lbm/event | 4.2 | 14 | 17 |
| CO | 28.01 | lbm/event | 84 | 115 | 117 |
| UHC | 16.04 | lbm/event | 66 | 76 | 77 |
| VOC | 16.04 | lbm/event | 13 | 15 | 15 |
| Fuel Flow | -- | MMBTU/event | 12 | 70 | 177 |
| Output | -- | MW*hrs | 0 | 3.6 | 14 |

TG = Turning Gear
 FSNL = Full Speed No Load
 BL = Baseload
 Mol Weight = Assumed Molecular Weight
 FSNL-TG does not include duration at FSNL

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| | | | | | |
|--------------------------|----------------|----------|-----------|----------|--|
| GENERAL ELECTRIC COMPANY | | SIZE | CAGE CODE | DWG NO | |
| g GE ENERGY | GREENVILLE, SC | A | | 329A5375 | |
| DRAWN Daniel R Tegel | | SCALE | | SHEET 2 | |
| ISSUED Dennis J. Varga | | | | | |



US EPA ARCHIVE DOCUMENT

TRPP
 Grimes County Peaking Unit
 Grimes County, Texas
 GE Shutdown Information

7FA.04 Emissions Shutdown Summary

| Traditional Shutdown Estimated Emissions | | | | |
|--|-------------|------------|-----------|------------|
| | | FSNL to TG | 50% to TG | 100% to TG |
| NOx | lb/event | 4 | 19 | 24 |
| CO | lb/event | 63 | 192 | 197 |
| UHC | lb/event | 20 | 65 | 67 |
| VOC | lb/event | 8 | 17 | 17 |
| Fuel | MMBtu/event | 10 | 85 | 236 |
| Output | MWh | 0.0 | 5.2 | 21 |

*Ambient conditions for above are sea level, 59F/60%RH
 FSNL to TG mass estimated from 7FA.05 Curves

IPS- Project 1 : - 7FA.04-1112 1 Version Code- 4.2.3c/347/7FA.04-1112

TRPP
Tenaska Roans Prairie Generating Station
Grimes County, Texas
Historical Fuel Data and Statistical Analysis

| Gas Day Date | Heating Value | CO ₂ Intensity | Total CO ₂ | CO ₂ Cont | O ₂ Cont | N ₂ Cont | Methane Cont | Ethane Cont | Propane Cont | I Butane Cont | N Butane Cont | I Pentane Cont | N Pentane Cont | Neo Pentane Cont | N Hexane Cont | Heptane Cont | Octane Cont |
|---|---------------|---------------------------|-----------------------|----------------------|---------------------|---------------------|--------------|-------------|--------------|---------------|---------------|----------------|----------------|------------------|---------------|--------------|-------------|
| Stoichiometry (mol CO ₂ / Mol component) | | | | 1 | 0 | 0 | 1 | 2 | 3 | 4 | 4 | 5 | 5 | 5 | 6 | 7 | 8 |
| 11/20/2012 | 1,009.1 | 118.2 | 4,528.5 | 83.5428 | - | - | 4,230.4064 | 110.5544 | 24.8556 | 33.3168 | 9.5040 | 9.7900 | 5.4120 | 2.3320 | - | 5.5132 | 13.2704 |
| 11/21/2012 | 1,009.2 | 118.1 | 4,526.5 | 82.0644 | - | - | 4,228.9368 | 113.9072 | 24.3408 | 32.4368 | 9.1344 | 9.4380 | 5.3020 | 2.1340 | - | 5.5132 | 13.3056 |
| 11/22/2012 | 1,008.5 | 118.0 | 4,519.8 | 81.0216 | - | - | 4,231.5724 | 110.2112 | 22.8888 | 31.1696 | 8.8176 | 9.1300 | 5.1480 | 2.1340 | - | 5.2052 | 12.4960 |
| 11/23/2012 | 1,008.5 | 118.0 | 4,518.2 | 80.9688 | - | - | 4,233.2708 | 108.3984 | 23.1924 | 30.5184 | 8.8000 | 9.0420 | 5.0160 | 2.0240 | - | 4.9896 | 12.0032 |
| 11/24/2012 | 1,008.7 | 118.0 | 4,519.4 | 80.3660 | - | - | 4,232.5932 | 110.1848 | 23.1528 | 30.7824 | 8.8352 | 9.1080 | 5.0820 | 2.0240 | - | 5.0512 | 12.1792 |
| 11/25/2012 | 1,008.5 | 117.9 | 4,516.1 | 79.9172 | - | - | 4,233.3368 | 110.0000 | 22.5456 | 29.5680 | 8.5008 | 8.7120 | 4.7960 | 1.8920 | - | 4.9280 | 11.8624 |
| 11/26/2012 | 1,008.4 | 117.9 | 4,515.7 | 80.5992 | - | - | 4,233.6800 | 109.3576 | 22.7568 | 29.3040 | 8.5888 | 8.8660 | 4.8620 | 1.9140 | - | 4.6200 | 11.1232 |
| 11/27/2012 | 1,009.6 | 118.0 | 4,522.6 | 78.2804 | - | - | 4,231.9288 | 113.8808 | 24.0108 | 31.4864 | 9.1168 | 9.3940 | 5.2800 | 2.1340 | - | 5.0204 | 12.1088 |
| 11/28/2012 | 1,009.6 | 118.0 | 4,522.6 | 78.2804 | - | - | 4,231.9288 | 113.8808 | 24.0108 | 31.4864 | 9.1168 | 9.3940 | 5.2800 | 2.1340 | - | 5.0204 | 12.1088 |

Max 120.6
 Avg 118.2
 STD DEV 0.45317431
 AVG + 1 118.63
 AVG + 2 119.08
 AVG + 3 119.54
 Rounded 120.00

TRPP
 Tenaska Roans Prairie Generating Station
 Grimes County, Texas
 Historical Fuel Data and Statistical Analysis

| Gas Day Date | Heating Value | Gravity | Wobbe | Co2 Cont | O2 Cont | N2 Cont | Methane Cont | Ethane Cont | Propane Cont | C4+ Content | I Butane Cont | N Butane Cont | I Pentane Cont | N Pentane Cont | Neo Pentane Cont | N Hexane Cont | C6 Plus Cont | Heptane Cont | Octane Cont | Press Base |
|--------------|----------------|-----------------|----------------|----------|---------|---------|--------------|-------------|--------------|-------------|---------------|---------------|----------------|----------------|------------------|---------------|--------------|--------------|-------------|------------|
| | (Btu/SCF, HHV) | (dimensionless) | (Btu/SCF, HHV) | (mol%) | (mol%) | (mol%) | (mol%) | (mol%) | (mol%) | (mol%) | (mol%) | (mol%) | (mol%) | (mol%) | (mol%) | (mol%) | (mol%) | (mol%) | (mol%) | (psia) |
| Min | 1,006.2 | 0.5790 | 1,317.8 | 1.5900 | - | 0.1461 | 94.3288 | 0.7031 | 0.1252 | 0.1137 | 0.0399 | 0.0315 | 0.0009 | 0.0081 | - | 0.0107 | 0.0226 | 0.0080 | 0.0039 | 14.7 |
| Average | 1,012.0 | 0.5854 | 1,322.8 | 1.7669 | - | 0.3261 | 96.1763 | 1.3164 | 0.2222 | 0.2084 | 0.0620 | 0.0514 | 0.0279 | 0.0126 | - | 0.0176 | 0.0370 | 0.0131 | 0.0064 | 14.7 |
| Max | 1,030.1 | 0.6010 | 1,330.4 | 2.1667 | - | 0.4397 | 97.1713 | 2.4087 | 0.6112 | 0.5085 | 0.1405 | 0.1402 | 0.0620 | 0.0332 | - | 0.0427 | 0.0899 | 0.0318 | 0.0155 | 14.7 |
| 11/8/2012 | 1,021.0 | 0.5937 | 1,325.1 | 1.8565 | - | 0.4350 | 95.0536 | 1.9554 | 0.3868 | 0.3433 | 0.0945 | 0.0832 | 0.0414 | 0.0226 | - | 0.0327 | 0.0689 | 0.0243 | 0.0118 | 14.730 |
| 11/9/2012 | 1,021.2 | 0.5938 | 1,325.2 | 1.8554 | - | 0.4305 | 95.0588 | 1.9498 | 0.3888 | 0.3481 | 0.0951 | 0.0843 | 0.0423 | 0.0223 | - | 0.0335 | 0.0706 | 0.0249 | 0.0121 | 14.730 |
| 11/10/2012 | 1,009.2 | 0.5861 | 1,318.2 | 1.8643 | - | 0.4181 | 96.0026 | 1.3633 | 0.1886 | 0.1785 | 0.0520 | 0.0429 | 0.0235 | 0.0095 | - | 0.0163 | 0.0343 | 0.0121 | 0.0059 | 14.730 |
| 11/11/2012 | 1,010.2 | 0.5854 | 1,320.3 | 1.7938 | - | 0.4005 | 96.1064 | 1.3343 | 0.1918 | 0.1897 | 0.0549 | 0.0450 | 0.0247 | 0.0102 | - | 0.0177 | 0.0372 | 0.0131 | 0.0064 | 14.730 |
| 11/12/2012 | 1,010.2 | 0.5855 | 1,320.2 | 1.8048 | - | 0.3920 | 96.1056 | 1.3344 | 0.1913 | 0.1883 | 0.0538 | 0.0443 | 0.0250 | 0.0103 | - | 0.0177 | 0.0372 | 0.0131 | 0.0064 | 14.730 |
| 11/13/2012 | 1,010.0 | 0.5852 | 1,320.3 | 1.8183 | - | 0.3519 | 96.1982 | 1.2627 | 0.1921 | 0.1939 | 0.0555 | 0.0454 | 0.0254 | 0.0105 | - | 0.0184 | 0.0387 | 0.0137 | 0.0067 | 14.730 |
| 11/14/2012 | 1,027.9 | 0.5973 | 1,330.0 | 1.8172 | - | 0.4154 | 94.4817 | 2.4087 | 0.5353 | 0.1116 | 0.0991 | 0.0434 | 0.0224 | - | 0.0300 | 0.0631 | 0.0223 | 0.0108 | 0.0108 | 14.730 |
| 11/15/2012 | 1,014.8 | 0.5880 | 1,323.4 | 1.8119 | - | 0.3369 | 95.8304 | 1.5164 | 0.2817 | 0.2421 | 0.0721 | 0.0602 | 0.0308 | 0.0137 | - | 0.0210 | 0.0443 | 0.0157 | 0.0076 | 14.730 |
| 11/16/2012 | 1,012.8 | 0.5868 | 1,322.1 | 1.8227 | - | 0.3258 | 95.9986 | 1.4142 | 0.2379 | 0.2197 | 0.0635 | 0.0521 | 0.0288 | 0.0126 | - | 0.0202 | 0.0425 | 0.0150 | 0.0073 | 14.730 |
| 11/17/2012 | 1,011.0 | 0.5856 | 1,321.1 | 1.8245 | - | 0.3223 | 96.1655 | 1.2941 | 0.2073 | 0.2038 | 0.0592 | 0.0480 | 0.0267 | 0.0112 | - | 0.0189 | 0.0398 | 0.0141 | 0.0068 | 14.730 |
| 11/18/2012 | 1,011.0 | 0.5856 | 1,321.1 | 1.8235 | - | 0.3218 | 96.1673 | 1.2940 | 0.2077 | 0.2030 | 0.0593 | 0.0483 | 0.0267 | 0.0112 | - | 0.0185 | 0.0390 | 0.0138 | 0.0067 | 14.730 |
| 11/19/2012 | 1,010.3 | 0.5849 | 1,321.0 | 1.8242 | - | 0.3003 | 96.2910 | 1.2060 | 0.1942 | 0.2026 | 0.0564 | 0.0482 | 0.0269 | 0.0111 | - | 0.0193 | 0.0407 | 0.0144 | 0.0070 | 14.730 |
| 11/20/2012 | 1,009.1 | 0.5858 | 1,318.4 | 1.8987 | - | 0.3386 | 96.1456 | 1.2563 | 0.1883 | 0.1893 | 0.0540 | 0.0445 | 0.0246 | 0.0106 | - | 0.0179 | 0.0377 | 0.0133 | 0.0065 | 14.730 |
| 11/21/2012 | 1,009.2 | 0.5857 | 1,318.7 | 1.8651 | - | 0.3764 | 96.1122 | 1.2944 | 0.1844 | 0.1843 | 0.0519 | 0.0429 | 0.0241 | 0.0097 | - | 0.0179 | 0.0378 | 0.0134 | 0.0065 | 14.730 |
| 11/22/2012 | 1,008.5 | 0.5851 | 1,318.4 | 1.8414 | - | 0.3993 | 96.1721 | 1.2524 | 0.1734 | 0.1771 | 0.0501 | 0.0415 | 0.0234 | 0.0097 | - | 0.0169 | 0.0355 | 0.0125 | 0.0061 | 14.730 |
| 11/23/2012 | 1,008.5 | 0.5849 | 1,318.7 | 1.8402 | - | 0.3832 | 96.2107 | 1.2318 | 0.1757 | 0.1734 | 0.0500 | 0.0411 | 0.0228 | 0.0092 | - | 0.0162 | 0.0341 | 0.0121 | 0.0059 | 14.730 |
| 11/24/2012 | 1,008.7 | 0.5849 | 1,318.9 | 1.8265 | - | 0.3912 | 96.1953 | 1.2521 | 0.1754 | 0.1749 | 0.0502 | 0.0414 | 0.0231 | 0.0092 | - | 0.0164 | 0.0346 | 0.0122 | 0.0059 | 14.730 |
| 11/25/2012 | 1,008.5 | 0.5847 | 1,318.9 | 1.8163 | - | 0.3977 | 96.2122 | 1.2500 | 0.1708 | 0.1680 | 0.0483 | 0.0396 | 0.0218 | 0.0086 | - | 0.0160 | 0.0337 | 0.0119 | 0.0058 | 14.730 |
| 11/26/2012 | 1,008.4 | 0.5847 | 1,318.8 | 1.8318 | - | 0.3806 | 96.2200 | 1.2427 | 0.1724 | 0.1665 | 0.0488 | 0.0403 | 0.0221 | 0.0087 | - | 0.0150 | 0.0316 | 0.0112 | 0.0054 | 14.730 |
| 11/27/2012 | 1,009.6 | 0.5848 | 1,320.2 | 1.7791 | - | 0.4011 | 96.1802 | 1.2941 | 0.1819 | 0.1789 | 0.0518 | 0.0427 | 0.0240 | 0.0097 | - | 0.0163 | 0.0344 | 0.0122 | 0.0059 | 14.730 |
| 11/28/2012 | 1,009.6 | 0.5848 | 1,320.2 | 1.7791 | - | 0.4011 | 96.1802 | 1.2941 | 0.1819 | 0.1789 | 0.0518 | 0.0427 | 0.0240 | 0.0097 | - | 0.0163 | 0.0344 | 0.0122 | 0.0059 | 14.730 |



Engine Specification Sheet

Cummins Fire Power

De Pere, WI 54115

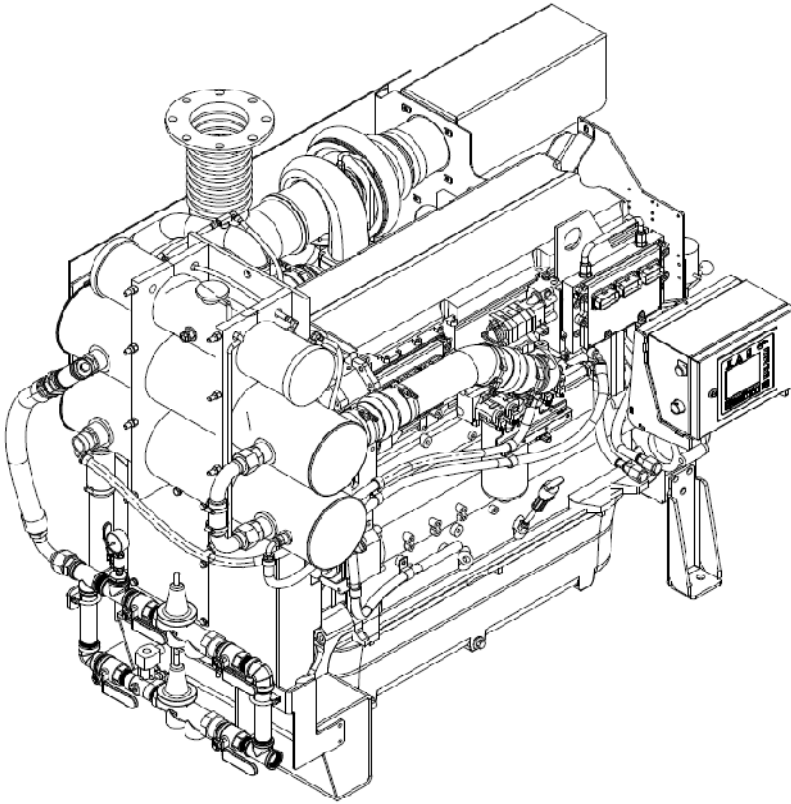
<http://www.cumminsfirepower.com>

CFP Engine Model

CFP15E-F Series

Curve Number: FR - 10549 & 10663

Revision Date: June 2011



| Equipment | Standard | Optional |
|------------------------------|---|--|
| Air Cleaner | Direct Mounted, oil impregnated serviceable element (K&N) | Housed Unit, Flame Resistant Element (FLG AH19266) |
| Alternator | 24V-DC, 70 Amps; With Belt Guard | N/A |
| Cooling Loop | Optional | For Fresh Water or Salt Water Applications |
| Exhaust Protection | Metal Guards on Manifolds and Turbo | N/A |
| Exhaust Flex Connection | SS Flex, NPT | SS Flex, 150# Flange |
| Flywheel Power Take-Off | Flywheel | • Drive Shaft System • Stub Shaft |
| Fuel Connections | Fire Resistant Flexible Supply and Return Lines | N/A |
| Fuel Injection | Direct Injection | N/A |
| Fuel Filter | Primary Filter with Priming Pump | N/A |
| Engine Heater | 120 / 240 VAC, 3000 Watt | N/A |
| Governor, Speed | Constant Speed | N/A |
| Heat Exchanger | Tube & Shell Type, 60 PSI with NPTF Connections | N/A |
| Instrument Panel | English and Metric, Tachometer, Hourmeter, Water Temperature, Oil Pressure & Two (2) Voltmeters | N/A |
| Junction Box | Integral with Instrument Panel; For DC Wiring Interconnection to Engine Controller | N/A |
| Lube Oil Cooler | Engine Water Cooled, Plate Type | N/A |
| Lube Oil Filter | Full Flow with By-Pass Valve | N/A |
| Lube Oil Pump | Gear Driven | N/A |
| Manual Start | On Instrument Panel | N/A |
| Overspeed Controls | Electronic with Reset & Test on Instrument Panel | N/A |
| Raw Water Solenoid Operation | Automatic from Engine Controller & from Emergency Local Control | N/A |
| Run-Stop Control | On Instrument Panel | N/A |
| Run Solenoid | 24V-DC | N/A |
| Starters | 24V-DC | N/A |
| Throttle Control | Adjustable Speed Control | N/A |
| Water Pump | Poly-Vee Belt Drive with Guard | N/A |

Operating Speed (RPM) Listed Ratings

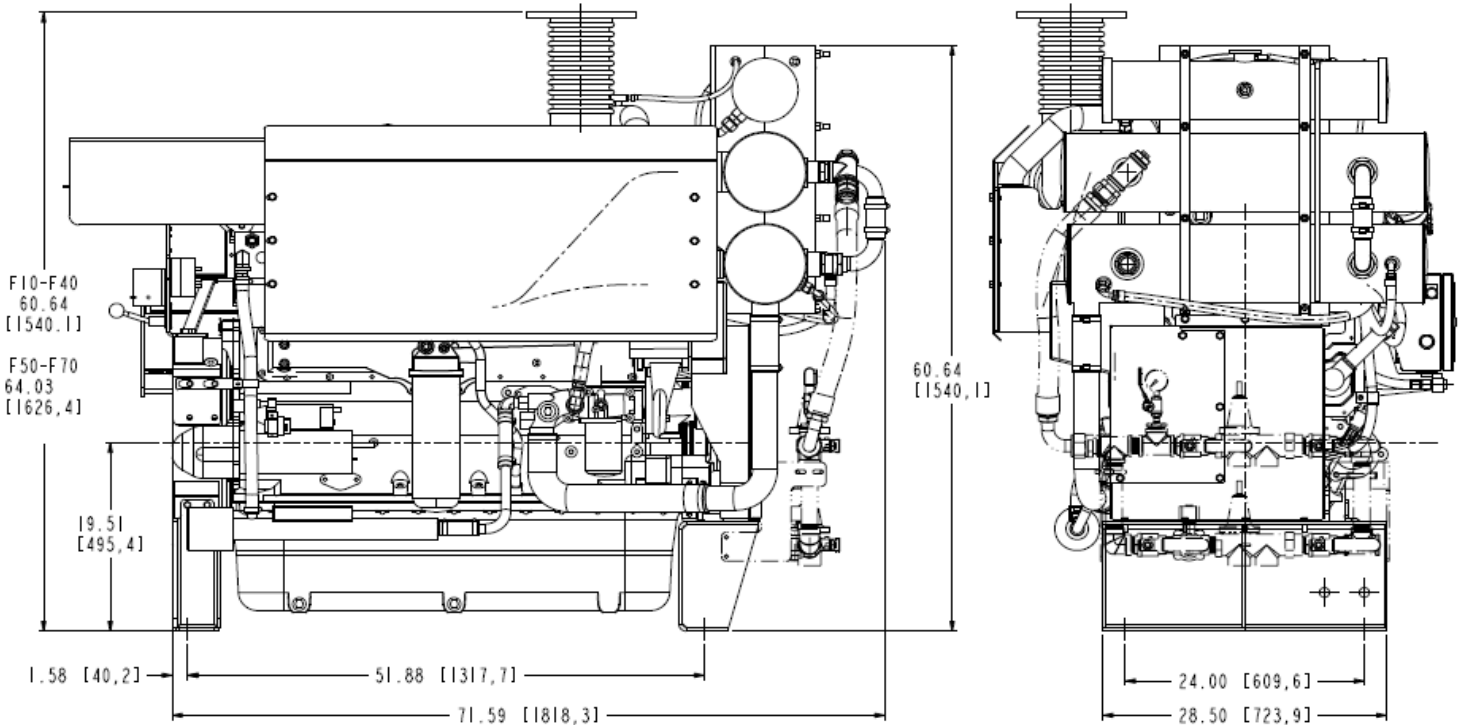
| Model | 1470 | 1760 | 1900 | 2100 | 2250 |
|------------|-----------|-----------|-----------|-----------|-----------|
| CFP15E-F70 | | 686 (512) | | | |
| CFP15E-F60 | | 650 (485) | | | |
| CFP15E-F50 | | 610 (455) | | | |
| CFP15E-F40 | 477 (356) | 575 (429) | 610 (455) | 610 (455) | 475 (354) |
| CFP15E-F30 | 450 (336) | 542 (404) | 575 (429) | 575 (429) | 448 (334) |
| CFP15E-F20 | 411 (306) | 494 (368) | 524 (391) | 525 (391) | 409 (305) |
| CFP15E-F10 | 382 (285) | 460 (343) | 488 (364) | 488 (364) | 380 (283) |

Ratings are: HP (kW)

Specifications

| | |
|--|-------------------------------------|
| Aspiration..... | Turbocharged and Charge Air Cooled |
| Rotation..... | Counter clockwise from flywheel end |
| Weight - lb (kg) Est | 4400 (1980) |
| Displacement - in ³ (liter)..... | 915 (15.0) |
| Engine Type..... | 4 Cycle; In-Line, 6 Cylinder |
| Engine Series..... | Cummins QSX15 Series |
| Exhaust Emissions...CFP15E-F10, F20, F30, F40..... | EPA/CARB Tier 3 |
| Exhaust Emissions...CFP15E-F50, F60, F70..... | EPA/CARB Tier 2 |





Engine Ratings Baselines

- Engines are rated at standard SAE conditions of 29.61 in. (7521 mm) Hg barometer and 77°F (25°C) inlet air temperature (approximates 300ft. (91.4 m) above sea level) by the testing laboratory (see SAE Standard J1349).
- A deduction of 3 percent from engine horsepower rating at standard SAE conditions shall be made for diesel engines for each 1000 ft. (305 m) altitude above 300 ft. (91.4 m).
- A deduction of 1 percent from engine horsepower rating as corrected to standard SAE conditions shall be made for diesel engines for every 10°F above 77°F (24°C) ambient temperature.

Certified Power

This Cummins Fire Power fire pump driver is built to comply with NFPA-20, and is UL listed and FM approved.

For additional information, click the hyperlinks below.

- [CFP15E-F10](#)
- [CFP15E-F20](#)
- [CFP15E-F30](#)
- [CFP15E-F40](#)
- [CFP15E-F50](#)
- [CFP15E-F60](#)
- [CFP15E-F70](#)



EPA & CARB Tier 3 Emission Data
Fire Pump NSPS Compliant

CFP15E-F30 Fire Pump Driver

Type: 4 Cycle; In-Line; 6 Cylinder
Aspiration: Turbocharged, Charge Air Cooled

| 15 PPM Diesel Fuel | | | | | | | | | | | | | | | | | |
|--------------------|-----|------------------|-------|----------------------------|-------|----------|-------|-------|-------------------|-------|----------|-------|-------|-------------|-----|----------|-------|
| RPM | BHP | Fuel Consumption | | D2 Cycle Exhaust Emissions | | | | | | | | | | Exhaust | | | |
| | | Gal/Hr | L/hr | Grams per BHP - HR | | | | | Grams per kW - HR | | | | | Temperature | | Gas Flow | |
| | | | | NMHC | NOx | NMHC+NOx | CO | PM | NMHC | NOx | NMHC+NOx | CO | PM | °F | °C | CFM | L/sec |
| 1470 | 450 | 23.5 | 89.0 | 0.086 | 2.565 | 2.651 | 0.671 | 0.078 | 0.116 | 3.439 | 3.555 | 0.900 | 0.105 | 969 | 521 | 2740 | 1293 |
| 1760 | 542 | 26.5 | 100.3 | | | | | | | | | | | 905 | 485 | 3164 | 1493 |
| 1900 | 575 | 27.9 | 105.6 | | | | | | | | | | | 906 | 486 | 3328 | 1571 |
| 2100 | 575 | 29.1 | 110.2 | | | | | | | | | | | 884 | 473 | 3577 | 1688 |
| 2250 | 448 | 23.1 | 87.4 | | | | | | | | | | | 778 | 414 | 3756 | 1773 |

The emissions values above are based on CARB approved calculations for converting EPA (500 ppm) fuel to CARB (15 ppm) fuel.

| 300-4000 PPM Diesel Fuel | | | | | | | | | | | | | | | | | |
|--------------------------|-----|------------------|-------|----------------------------|-------|----------|-------|-------|-------------------|-------|----------|-------|-------|-------------|-----|----------|-------|
| RPM | BHP | Fuel Consumption | | D2 Cycle Exhaust Emissions | | | | | | | | | | Exhaust | | | |
| | | Gal/Hr | L/hr | Grams per BHP - HR | | | | | Grams per kW - HR | | | | | Temperature | | Gas Flow | |
| | | | | NMHC | NOx | NMHC+NOx | CO | PM | NMHC | NOx | NMHC+NOx | CO | PM | °F | °C | CFM | L/sec |
| 1470 | 450 | 23.5 | 89.0 | 0.104 | 2.781 | 2.886 | 0.671 | 0.089 | 0.14 | 3.730 | 3.870 | 0.900 | 0.120 | 969 | 521 | 2740 | 1293 |
| 1760 | 542 | 26.5 | 100.3 | | | | | | | | | | | 905 | 485 | 3164 | 1493 |
| 1900 | 575 | 27.9 | 105.6 | | | | | | | | | | | 906 | 486 | 3328 | 1571 |
| 2100 | 575 | 29.1 | 110.2 | | | | | | | | | | | 884 | 473 | 3577 | 1688 |
| 2250 | 448 | 23.1 | 87.4 | | | | | | | | | | | 778 | 414 | 3756 | 1773 |

QSX15 Base Model Manufactured by Cummins Inc.
- Using fuel rating 10663

Reference EPA Standard Engine Family: ACEXL015AAH
Reference CARB Executive Order: U-R-002-0532

No special options needed to meet current regulation emissions for all 50 states

Test Methods:

EPA/CARB Nonroad emissions recorded per 40CFR89 (ref. ISO8178-1) and weighted at load points prescribed in Subpart E, Appendix A, for Constant Speed Engines (ref. ISO8178-4, D2).

Diesel Fuel Specifications:

Cetane Number: 40-48
Reference: ASTM D975 No. 2-D

Reference Conditions:

Air Inlet Temperature: 25°C (77°F)
Fuel Inlet Temperature: 40°C (104°F)
Barometric Pressure: 100 kPa (29.53 in Hg)
Humidity: 10.7 g/kg (75 grains H₂O/lb) of dry air; required for NOx correction

Restrictions: Intake Restriction set to a maximum allowable limit for clean filter; Exhaust Back Pressure set to maximum allowable limit.

Tests conducted using alternate test methods, instrumentation, fuel or reference conditions can yield different results.

US EPA ARCHIVE DOCUMENT



Image shown may not reflect actual package.

STANDBY

**2000 kW 2500 kVA
60 Hz 1800 rpm 480 Volts**

Caterpillar is leading the power generation marketplace with Power Solutions engineered to deliver unmatched flexibility, expandability, reliability, and cost-effectiveness.

FEATURES

FUEL/EMISSIONS STRATEGY

- EPA Certified for Stationary Emergency Application (EPA Tier 2 emissions levels)

DESIGN CRITERIA

- The generator set accepts 100% rated load in one step per NFPA 110 and meets ISO 8528-5 transient response.

UL 2200 / CSA - Optional

- UL 2200 listed packages
 - CSA Certified
- Certain restrictions may apply. Consult with your Cat® Dealer.

FULL RANGE OF ATTACHMENTS

- Wide range of bolt-on system expansion attachments, factory designed and tested
- Flexible packaging options for easy and cost effective installation

SINGLE-SOURCE SUPPLIER

- Fully prototype tested with certified torsional vibration analysis available

WORLDWIDE PRODUCT SUPPORT

- Cat dealers provide extensive post sale support including maintenance and repair agreements
- Cat dealers have over 1,800 dealer branch stores operating in 200 countries
- The Cat® S•O•SSM program cost effectively detects internal engine component condition, even the presence of unwanted fluids and combustion by-products

CAT® 3516C TA DIESEL ENGINE

- Reliable, rugged, durable design
- Field-proven in thousands of applications worldwide
- Four-stroke-cycle diesel engine combines consistent performance and excellent fuel economy with minimum weight

CAT GENERATOR

- Matched to the performance and output characteristics of Cat engines
- Industry leading mechanical and electrical design
- Industry leading motor starting capabilities
- High Efficiency

CAT EMCP 4 CONTROL PANELS

- Simple user friendly interface and navigation
- Scalable system to meet a wide range of customer needs
- Integrated Control System and Communications Gateway

SEISMIC CERTIFICATION

- Seismic Certification available
- Anchoring details are site specific, and are dependent on many factors such as generator set size, weight, and concrete strength. IBC Certification requires that the anchoring system used is reviewed and approved by a Professional Engineer
- Seismic Certification per Applicable Building Codes: IBC 2000, IBC 2003, IBC 2006, IBC 2009, CBC 2007
- Pre-approved by OSHP and carries an OPA#(OSP-0084-01) for use in healthcare projects in California

STANDBY 2000 kW 2500 kVA

60 Hz 1800 rpm 480 Volts



FACTORY INSTALLED STANDARD & OPTIONAL EQUIPMENT

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| System | Standard | Optional |
|-------------------|--|---|
| Air Inlet | <ul style="list-style-type: none"> • Single element canister type air cleaner • Service indicator | <input type="checkbox"/> Dual element & heavy duty air cleaners <input type="checkbox"/> Air inlet adapters & shut-off |
| Cooling | <ul style="list-style-type: none"> • Radiator with guard • Coolant drain line with valve • Fan and belt guards • Cat® Extended Life Coolant* | <input type="checkbox"/> Radiator duct flange <input type="checkbox"/> Jacket water heater |
| Exhaust | <ul style="list-style-type: none"> • Dry exhaust manifold • Flanged faced outlets | <input type="checkbox"/> Mufflers and Silencers <input type="checkbox"/> Stainless steel exhaust flex fittings <input type="checkbox"/> Elbows, flanges, expanders & Y adapters |
| Fuel | <ul style="list-style-type: none"> • Secondary fuel filters • Fuel priming pump • Flexible fuel lines • Fuel cooler* | <input type="checkbox"/> Water separator <input type="checkbox"/> Duplex fuel filter |
| Generator | <ul style="list-style-type: none"> • Class H insulation • Cat digital voltage regulator (CDVR) with kVAR/PF control, 3-phase sensing • Winding temperature detectors • Anti-condensation heaters • Reactive Droop | <input type="checkbox"/> Oversize & premium generators <input type="checkbox"/> Bearing temperature detectors |
| Power Termination | <ul style="list-style-type: none"> • Bus bar (NEMA or IEC mechanical lug holes)- right side standard • Top and bottom cable entry | <input type="checkbox"/> Circuit breakers, UL listed, 3 pole with shunt trip, 100% rated, manual or electrically operated <input type="checkbox"/> Circuit breakers, IEC compliant, 3 or 4 pole with shunt trip, manual or electrically operated <input type="checkbox"/> Bottom cable entry <input type="checkbox"/> Power terminations can be located on the right, left and/or rear as an option. |
| Governor | <ul style="list-style-type: none"> • ADEM™ 3 | <input type="checkbox"/> Load share module |
| Control Panels | <ul style="list-style-type: none"> • EMCP 4.2 Genset controller • User Interface panel (UIP) - rear mount • AC & DC customer wiring area (right side) • Emergency stop pushbutton | <input type="checkbox"/> Local & remote annunciator modules <input type="checkbox"/> Digital I/O Module <input type="checkbox"/> Generator temperature monitoring & protection |
| Lube | <ul style="list-style-type: none"> • Lubricating oil and filter • Oil drain line with valves • Fumes disposal • Gear type lube oil pump | <input type="checkbox"/> Oil level regulator <input type="checkbox"/> Deep sump oil pan <input type="checkbox"/> Electric & air prelube pumps <input type="checkbox"/> Manual prelube with sump pump <input type="checkbox"/> Duplex oil filter |
| Mounting | <ul style="list-style-type: none"> • Rails - engine / generator / radiator mounting • Rubber anti-vibration mounts (shipped loose) | <input type="checkbox"/> Isolator removal <input type="checkbox"/> Spring-type vibration isolator <input type="checkbox"/> IBC Isolators |
| Starting/Charging | <ul style="list-style-type: none"> • 24 volt starting motor(s) • Batteries with rack and cables • Battery disconnect switch | <input type="checkbox"/> Battery chargers (10 or 20 amp) <input type="checkbox"/> 45 amp charging alternator <input type="checkbox"/> Oversize batteries <input type="checkbox"/> Ether starting aid <input type="checkbox"/> Heavy duty starting motors <input type="checkbox"/> Barring device (manual) <input type="checkbox"/> Air starting motor with control & silencer |
| General | <ul style="list-style-type: none"> • Right-hand service • Paint - Caterpillar Yellow except rails and radiators are gloss black • SAE standard rotation • Flywheel and flywheel housing - SAE No. 00 | <input type="checkbox"/> CSA certification <input type="checkbox"/> CE Certificate of Conformance <input type="checkbox"/> Seismic Certification per Applicable Building Codes: IBC 2000, IBC 2003, IBC 2006, IBC 2009, CBC 2007 * Not included with packages without radiators |
| Note | Standard and optional equipment may vary for UL 2200 Listed Packages. UL 2200 Listed packages may have oversized generators with a different temperature rise and motor starting characteristics. | |

STANDBY 2000 kW 2500 kVA

60 Hz 1800 rpm 480 Volts



SPECIFICATIONS

CAT GENERATOR

Cat Generator
Frame size..... 825
Excitation..... Permanent Magnet
Pitch..... 0.6667
Number of poles..... 4
Number of bearings..... Single bearing
Number of Leads..... 006
Insulation..... UL 1446 Recognized Class H with tropicalization and antiabrasion
Insulation..... Class F
- Consult your Caterpillar dealer for available voltages
IP Rating..... IP23
Alignment..... Pilot Shaft
Overspeed capability..... 150
Wave form Deviation (Line to Line)..... 003.00
Voltage regulator..... 3 Phase sensing with selectable volts/Hz
Voltage regulation..... Less than +/- 1/2% (steady state)
Less than +/- 1/2% (w/3% speed change)

CAT DIESEL ENGINE

3516C ATAAC, V-16, 4-Stroke Water-cooled Diesel
Bore..... 170.00 mm (6.69 in)
Stroke..... 190.00 mm (7.48 in)
Displacement..... 69.00 L (4210.64 in³)
Compression Ratio..... 14.7:1
Aspiration..... TA
Fuel System..... Electronic unit injection
Governor Type..... ADEM3

CAT EMCP 4 SERIES CONTROLS

EMCP 4 controls including:

- Run / Auto / Stop Control
- Speed and Voltage Adjust
- Engine Cycle Crank
- 24-volt DC operation
- Environmental sealed front face
- Text alarm/event descriptions

Digital indication for:

- RPM
- DC volts
- Operating hours
- Oil pressure (psi, kPa or bar)
- Coolant temperature
- Volts (L-L & L-N), frequency (Hz)
- Amps (per phase & average)
- kW, kVA, kVAR, kW-hr, %kW, PF

Warning/shutdown with common LED indication of:

- Low oil pressure
- High coolant temperature
- Overspeed
- Emergency stop
- Failure to start (overcrank)
- Low coolant temperature
- Low coolant level

Programmable protective relaying functions:

- Generator phase sequence
- Over/Under voltage (27/59)
- Over/Under Frequency (81 o/u)
- Reverse Power (kW) (32)
- Reverse reactive power (kVA) (32RV)
- Overcurrent (50/51)

Communications:

- Six digital inputs (4.2 only)
- Four relay outputs (Form A)
- Two relay outputs (Form C)
- Two digital outputs
- Customer data link (Modbus RTU)
- Accessory module data link
- Serial annunciator module data link
- Emergency stop pushbutton

Compatible with the following:

- Digital I/O module
- Local Annunciator
- Remote CAN annunciator
- Remote serial annunciator

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STANDBY 2000 kW 2500 kVA

60 Hz 1800 rpm 480 Volts



TECHNICAL DATA

| Open Generator Set - - 1800 rpm/60 Hz/480 Volts | DM8263 | |
|--|---|--|
| EPA Certified for Stationary Emergency Application (EPA Tier 2 emissions levels) | | |
| Generator Set Package Performance Genset Power rating @ 0.8 pf Genset Power rating with fan | 2500 kVA 2000 kW | |
| Fuel Consumption 100% load with fan 75% load with fan 50% load with fan | 522.5 L/hr 406.8 L/hr 293.6 L/hr | 138.0 Gal/hr 107.5 Gal/hr 77.6 Gal/hr |
| Cooling System¹ Air flow restriction (system) Air flow (max @ rated speed for radiator arrangement) Engine Coolant capacity with radiator/exp. tank Engine coolant capacity Radiator coolant capacity | 0.12 kPa 2480 m ³ /min 475.0 L 233.0 L 242.0 L | 0.48 in. water 87580 cfm 125.5 gal 61.6 gal 63.9 gal |
| Inlet Air Combustion air inlet flow rate | 185.5 m ³ /min | 6550.9 cfm |
| Exhaust System Exhaust stack gas temperature Exhaust gas flow rate Exhaust flange size (internal diameter) Exhaust system backpressure (maximum allowable) | 400.1 ° C 433.1 m ³ /min 203.2 mm 6.7 kPa | 752.2 ° F 15294.8 cfm 8.0 in 26.9 in. water |
| Heat Rejection Heat rejection to coolant (total) Heat rejection to exhaust (total) Heat rejection to aftercooler Heat rejection to atmosphere from engine Heat rejection to atmosphere from generator | 759 kW 1788 kW 672 kW 133 kW 107.5 kW | 43164 Btu/min 101683 Btu/min 38217 Btu/min 7564 Btu/min 6113.5 Btu/min |
| Alternator² Motor starting capability @ 30% voltage dip Frame Temperature Rise | 4647 skVA 825 130 ° C | 234 ° F |
| Lube System Sump refill with filter | 401.3 L | 106.0 gal |
| Emissions (Nominal)³ NOx g/hp-hr CO g/hp-hr HC g/hp-hr PM g/hp-hr | 5.45 g/hp-hr .3 g/hp-hr .11 g/hp-hr .025 g/hp-hr | |

¹ For ambient and altitude capabilities consult your Cat dealer. Air flow restriction (system) is added to existing restriction from factory.

² Generator temperature rise is based on a 40 degree C ambient per NEMA MG1-32. UL 2200 Listed packages may have oversized generators with a different temperature rise and motor starting characteristics.

³ Emissions data measurement procedures are consistent with those described in EPA CFR 40 Part 89, Subpart D & E and ISO8178-1 for measuring HC, CO, PM, NOx. Data shown is based on steady state operating conditions of 77°F, 28.42 in HG and number 2 diesel fuel with 35° API and LHV of 18,390 btu/lb. The nominal emissions data shown is subject to instrumentation, measurement, facility and engine to engine variations. Emissions data is based on 100% load and thus cannot be used to compare to EPA regulations which use values based on a weighted cycle.

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STANDBY 2000 kW 2500 kVA

60 Hz 1800 rpm 480 Volts



RATING DEFINITIONS AND CONDITIONS

Meets or Exceeds International Specifications: AS1359, CSA, IEC60034-1, ISO3046, ISO8528, NEMA MG 1-22, NEMA MG 1-33, UL508A, 72/23/EEC, 98/37/EC, 2004/108/EC

Standby - Output available with varying load for the duration of the interruption of the normal source power. Average power output is 70% of the standby power rating. Typical operation is 200 hours per year, with maximum expected usage of 500 hours per year. Standby power in accordance with ISO8528. Fuel stop power in accordance with ISO3046. Standby ambients shown indicate ambient temperature at 100% load which results in a coolant top tank temperature just below the shutdown temperature.

Ratings are based on SAE J1349 standard conditions. These ratings also apply at ISO3046 standard conditions. **Fuel rates** are based on fuel oil of 35° API [16° C (60° F)] gravity having an LHV of 42 780 kJ/kg (18,390 Btu/lb) when used at 29° C (85° F) and weighing 838.9 g/liter (7.001 lbs/U.S. gal.). Additional ratings may be available for specific customer requirements, contact your Cat representative for details. For information regarding Low Sulfur fuel and Biodiesel capability, please consult your Cat dealer.

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STANDBY 2000 kW 2500 kVA

60 Hz 1800 rpm 480 Volts



DIMENSIONS

| Package Dimensions | | |
|--------------------|-----------|-----------|
| Length | 6424.6 mm | 252.94 in |
| Width | 2378.1 mm | 93.63 in |
| Height | 2966.3 mm | 116.78 in |

NOTE: For reference only - do not use for installation design. Please contact your local dealer for exact weight and dimensions. (General Dimension Drawing #2846051).

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Performance No.: DM8263

Feature Code: 516DE5R

Gen. Arr. Number: 2628106

Source: U.S. Sourced

February 13 2012

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Confidential Supporting Documentation
Appendix E

March 3, 2014
Project No. 0189555

[to be provided under separate cover]

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Houston, Texas 77024-3920
(281) 600-1000