

US EPA ARCHIVE DOCUMENT



November 18, 2014

Mr. Jeffrey Robinson
Chief, Air Permits Section
U.S. Environmental Protection Agency
Region 6 (6PD-R)
1445 Ross Avenue
Dallas, TX 75202-2733

Re: Transfer to Texas Commission on Environmental Quality (TCEQ) of Application to Amend
Prevention of Significant Deterioration (PSD) Permit PSD-TX-1358-GHG
Authorization to Construct 3 Gas Turbine Facilities
Golden Spread Electric Cooperative, Inc.
Antelope Elk Energy Center, Abernathy, Hale County, Texas

Dear Mr. Robinson:

On July 15, 2014, Golden Spread Electric Cooperative, Inc. (GSEC) submitted an application concurrently to the TCEQ and the U.S. Environmental Protection Agency (EPA) Region 6 to amend its PSD permit for greenhouse gas (GHG) pollutants from Antelope Elk Energy Center. The referenced permit currently authorizes the construction of a GE 7F 5-Series gas turbine in a simple-cycle application, and field construction of that unit is underway. That unit is intended to provide system capacity needs starting in early 2015. This new permit amendment application is to authorize the construction of three identical gas turbines to meet expected electrical power needs starting in early 2016. To meet those needs, construction of the additional turbines must begin by March 2015.

As shown in the permit application previously submitted, the proposed units are subject to PSD review for GHG pollutants. Several other non-GHG air pollutants are also subject to PSD review, and a PSD permit application covering those pollutants, and other pollutants not subject to PSD review, was separately submitted to TCEQ on July 15, 2014 (for Permit Nos. 109148 and PSDTX1358). At the time of our permit application submittals, EPA had not yet approved the Texas State Implementation Plan (SIP) to authorize the TCEQ's review and issuance of GHG PSD permits. However, with the approval of the SIP earlier this month, GSEC now requests that EPA transfer the permit amendment project entirely to the TCEQ for its final review and issuance. We understand that the Region has substantially completed drafts of a permit amendment and statement of basis (SOB) for the amendment. To facilitate the TCEQ's review of the permit amendment application, we request that EPA provide these draft documents to TCEQ.

We greatly appreciate the efforts of the Region's staff in reviewing the application to date and in developing the draft permit and SOB. Ms. Erica LeDoux and Ms. Melanie Magee have been particularly diligent in reviewing the permit amendment application materials and in resolving issues and questions on aspects of our proposed project.

If you have any questions or comments on this request, please contact either myself or Ms. Ruth Valle; Ruth is GSEC's Environmental Compliance and Policy Manager, and her phone number is 806/349-5205; her email address is rvalle@gsec.coop.

Sincerely yours,



George E. Hess
Vice President of Production
Golden Spread Electric Cooperative, Inc.

Attachment

Cc: Mr. Mike Wilson, P.E., Director, TCEQ Air Permits Division
Ms. Kate Stinchcomb, Manager, TCEQ Combustion & Coatings NSR Permits Section (via eMail)
Ms. Laura Gibson, P.E., TCEQ Combustion & Coatings NSR Permits Section (via eMail)