

Jon Niermann, *Chairman*  
Bobby Janecka, *Commissioner*  
Catarina R. Gonzales, *Commissioner*  
Kelly Keel, *Executive Director*



## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

November 4, 2024

MR JOE ARAIZA  
DIRECTOR ASSET DEVELOPMENT  
WATTBRIDGE TEXAS LLC  
2001 PROENERGY BLVD  
SEDALIA MO 65301-2470

Re: Electric Generating Units Air Quality Standard Permit  
(Effective 5/16/2007)  
Standard Permit Registration Number: 177854  
Standard Permit Expiration Date: November 4, 2034  
Wattbridge Texas LLC  
Imperial Power Station  
Texas City, Galveston County  
Regulated Entity Number: RN112062179  
Customer Reference Number: CN605946615

Dear Mr. Araiza:

Wattbridge Texas LLC submitted an application on October 10, 2024, to register construction related to Electric Generating Units to be located at on the south side of Attwater Ave., approximately 1.25 miles west of HWY 146, Texas City, Galveston County. We understand that this registration is for emissions associated with eight (8) natural gas-fired simple cycle combustion turbines and ancillary equipment.

The Texas Commission on Environmental Quality (TCEQ) has determined that your proposed emissions are authorized by this standard permit pursuant to Title 30 Texas Administrative Code § 116.602 and Texas Health and Safety Code § 382.05195, if constructed and operated as described in your registration. Authorized emissions are listed on the attached table.

You are also reminded that these facilities must comply with all rules and regulations of the TCEQ and of the U.S. Environmental Protection Agency at all times.

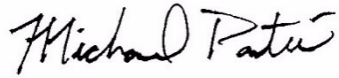
Permittees must report the operational status for each relevant standard permit registration by December 31<sup>st</sup> of each year electronically through the State of Texas Environmental Electronic Reporting System (STEERS). More information is available at [www.tceq.texas.gov/permitting/air/annual-reporting-requirements-airpermits](http://www.tceq.texas.gov/permitting/air/annual-reporting-requirements-airpermits).

If you need further information or have any questions, please contact Ms. Jana Banigo at (512) 239-3112 or write to the Texas Commission on Environmental Quality, Office of Air, Air Permits Division, MC-163, P.O. Box 13087, Austin, Texas 78711-3087.

Mr. Joe Araiza  
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Re: Standard Permit Registration Number 177854

Sincerely,

A handwritten signature in black ink that reads "Michael Partee". The signature is written in a cursive style with a horizontal line at the end.

Michael Partee, Manager  
Rule Registrations Section  
Air Permits Division  
Texas Commission on Environmental Quality

cc: Air Pollution Manager, Air and Water Pollution Services, Galveston County Health District, La  
Marque  
Air Section Manager, Region 12 - Houston

Project Number: 381487

Standard Permit Maximum Emission Rates Table  
Permit Number 177854

The facilities and emissions included in this table have been represented and reviewed as the maximum emissions authorized by this standard permit registration.

Emission Point No.	Source Name	Pollutant	Authorized Emissions	
			lbs/hr	tpy
CT-1 through CT-8	Combustion Turbines 1 -8 (Normal Operations)	NO <sub>x</sub>	7.28	--
		CO	10.28	--
		VOC	3.60	--
		PM	5.88	--
		PM <sub>10</sub>	5.88	--
		PM <sub>2.5</sub>	5.88	--
		SO <sub>2</sub>	1.43	--
		H <sub>2</sub> SO <sub>4</sub>	0.66	--
		(NH <sub>4</sub> ) <sub>2</sub> SO <sub>4</sub>	0.88	--
		NH <sub>3</sub>	6.94	--
CT-1 through CT-8	Combustion Turbines 1 -8 (MSS)	NO <sub>x</sub>	37.21	--
		CO	51.71	--
		VOC	3.64	--
		PM	5.88	--
		PM <sub>10</sub>	5.88	--
		PM <sub>2.5</sub>	5.88	--
		SO <sub>2</sub>	1.43	--
		H <sub>2</sub> SO <sub>4</sub>	0.66	--
		(NH <sub>4</sub> ) <sub>2</sub> SO <sub>4</sub>	0.88	--
		NH <sub>3</sub>	6.94	--
CT-1 through CT-8	Combustion Turbines 1 -8 (Combined Normal and MSS)	NO <sub>x</sub>	--	4.76
		CO	--	10.74
		VOC	--	3.08
		PM	--	5.33
		PM <sub>10</sub>	--	5.33
		PM <sub>2.5</sub>	--	5.33
		SO <sub>2</sub>	--	1.22
		H <sub>2</sub> SO <sub>4</sub>	--	0.56
(NH <sub>4</sub> ) <sub>2</sub> SO <sub>4</sub>	--	0.75		

		NH <sub>3</sub>	--	6.23
CT-1 through CT-8	Annual Emissions Cap for Combustion Turbine 1 through 8	NO <sub>x</sub>	--	206.91
		CO	--	146.89
		VOC	--	140.30
		PM	--	243.09
		PM <sub>10</sub>	--	243.09
		PM <sub>2.5</sub>	--	243.09
		SO <sub>2</sub>	--	55.49
		H <sub>2</sub> SO <sub>4</sub>	--	25.49
		(NH <sub>4</sub> ) <sub>2</sub> SO <sub>4</sub>	--	34.34
		NH <sub>3</sub>	--	190.70
CT-LOV-1 through CT-LOV-8	Combustion Turbine 1 -8 Lube Oil Vents	VOC	0.03	0.13
		PM	0.03	0.13
		PM <sub>10</sub>	0.03	0.13
		PM <sub>2.5</sub>	0.03	0.13
		PM <sub>10</sub>	0.03	0.13
		PM <sub>2.5</sub>	0.03	0.13
GEN-LOV-1 through GEN-LOV-8	Generator 1-8 Lube Oil Vents	VOC	0.03	0.13
		PM	0.03	0.13
		PM <sub>10</sub>	0.03	0.13
		PM <sub>2.5</sub>	0.03	0.13
HYD-OV-1 through HYD-OV-8	Unit 1-8 Hydraulic Oil Vents	VOC	0.03	0.13
		PM	0.03	0.13
		PM <sub>10</sub>	0.03	0.13
		PM <sub>2.5</sub>	0.03	0.13
		PM <sub>10</sub>	0.03	0.13
		PM <sub>2.5</sub>	0.03	0.13
VOC-FUG	VOC Fugitives	VOC	0.70	3.09
NH3-FUG	Ammonia Fugitives	NH <sub>3</sub>	5.02	22.00
CT-MSS	ILE Turbine Maintenance	VOC	0.85	0.03
		PM	5.07	0.96
		PM <sub>10</sub>	5.07	0.95
		PM <sub>2.5</sub>	5.07	0.95
		NH <sub>3</sub>	0.03	<0.01

Note: The authorized emission rates included in the table above represent the emission rates for each individual emission source.

- VOC - volatile organic compounds
- NO<sub>x</sub> - total oxides of nitrogen
- CO - carbon monoxide
- PM - total particulate matter, suspended in the atmosphere, including PM<sub>10</sub> and PM<sub>2.5</sub>, as represented
- PM<sub>10</sub> - total particulate matter equal to or less than 10 microns in diameter, including PM<sub>2.5</sub> as represented
- PM<sub>2.5</sub> - particulate matter equal to or less than 2.5 microns in diameter
- SO<sub>2</sub> - sulfur dioxide
- NH<sub>3</sub> - ammonia
- H<sub>2</sub>SO<sub>4</sub> - sulfuric acid
- (NH<sub>4</sub>)<sub>2</sub>SO<sub>4</sub> - ammonium sulfate

Note: Fugitive emission rates are estimates and are enforceable through compliance with the standard permit representations.

Date: November 4, 2024