

US EPA ARCHIVE DOCUMENT

**PREVENTION OF SIGNIFICANT DETERIORATION PERMIT
FOR GREENHOUSE GAS EMISSIONS
ISSUED PURSUANT TO THE REQUIREMENTS AT 40 CFR § 52.21**

U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION 6

PSD PERMIT NUMBER: PSD-TX-1290-GHG

PERMITTEE: El Paso Electric Company
100 North Stanton
El Paso, TX 79901

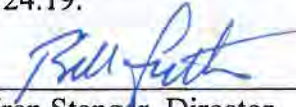
FACILITY NAME: Montana Power Station

FACILITY LOCATION: Section 25, Block 79, Township 2
El Paso, TX 79938

Pursuant to the provisions of the Clean Air Act (CAA), Subchapter I, Part C (42 U.S.C. Section 7470, *et. Seq.*), and the Code of Federal Regulations (CFR) Title 40, Section 52.21, and the Federal Implementation Plan at 40 CFR § 52.2305 (effective May 1, 2011 and published at 76 FR 25178), the U.S. Environmental Protection Agency, Region 6 is issuing a *Prevention of Significant Deterioration* (PSD) permit to El Paso Electric Company for Greenhouse Gas (GHG) emissions from its proposed Montana Power Station. The Permit applies to the addition of four natural gas-fired simple cycle combustion turbines, firewater pump engine, circuit breakers and associated natural gas piping at its new facility located in El Paso County, Texas.

El Paso Electric Company is authorized to construct the Montana Power Station, including four new natural gas-fired simple cycle combustion turbines, firewater pump engine, circuit breakers and natural gas piping as described herein, in accordance with the permit application (and plans submitted with the permit application), the federal PSD regulations at 40 CFR § 52.21, and other terms and conditions set forth in this PSD permit in conjunction with the corresponding Texas Commission on Environmental Quality (TCEQ) permit No. PSDTX1290 and 102294. Failure to comply with any condition or term set forth in this PSD Permit may result in enforcement action pursuant to Section 113 of the Clean Air Act (CAA). This PSD Permit does not relieve El Paso Electric Company of the responsibility to comply with any other applicable provisions of the CAA (including applicable implementing regulations in 40 CFR Parts 51, 52, 60, 61, 72 through 75, and 98) or other federal and state requirements (including the state PSD program that remains under approval at 40 CFR § 52.2303).

In accordance with 40 CFR §124.15(b), this PSD Permit becomes effective 30 days after the service of notice of this final decision unless review is requested on the permit pursuant to 40 CFR §124.19.



for Wren Stenger, Director
Multimedia Planning and Permitting Division

March 25, 2014
Date

**Montana Power Station (PSD-TX-1290-GHG)
Prevention of Significant Deterioration Permit
For Greenhouse Gas Emissions
Permit Conditions**

PROJECT DESCRIPTION

The Montana Power Station is a proposed 400 MW electric generating station located in El Paso County, Texas, using four (4) GE LMS100 simple cycle combustion turbines. In addition, the project also includes the installation of ancillary equipment that may emit GHG, including a firewater pump engine, circuit breakers and associated natural gas piping. The primary object of the proposed project is to meet peak and intermediate load requirements.

EQUIPMENT LIST

The following devices are subject to this GHG PSD permit.

FIN	EPN	Description
GT-1 GT-2 GT-3 GT-4	GT-1 GT-2 GT-3 GT-4	Four 100 MW (each, nominal gross) Natural Gas Fired-Simple Cycle Turbines (GE Model LMS100).
FWP-1	FWP-1	Diesel fire pump engine (design output not to exceed 327 hp). In addition to emergency fire suppression activities, the unit is limited to 1 hr per week; 52 hrs per 12-month rolling basis of operation for maintenance and testing.
CTBR-SF-6	CTBR-SF-6	SF ₆ Circuit Breaker Emissions
FUG-1	FUG-1	Natural Gas Piping Components

I. GENERAL PERMIT CONDITIONS

A. PERMIT EXPIRATION

As provided in 40 CFR §52.21(r), this PSD Permit shall become invalid if construction:

1. is not commenced (as defined in 40 CFR §52.21(b)(9)) within 18 months after the approval takes effect; or
2. is discontinued for a period of 18 months or more; or
3. is not completed within a reasonable time.

Pursuant to 40 CFR §52.21(r), EPA may extend the 18-month period upon a written satisfactory showing that an extension is justified.

B. PERMIT NOTIFICATION REQUIREMENTS

Permittee shall notify EPA Region 6 in writing or by electronic mail of the:

1. date construction is commenced, postmarked within 30 days of such date;
2. actual date of initial startup, as defined in 40 CFR § 60.2, postmarked within 15 days of such date; and
3. date upon which initial performance tests will commence, in accordance with the provisions of Section V, postmarked not less than 30 days prior to such date. Notification may be provided with the submittal of the performance test protocol required pursuant to Condition V.B.

C. FACILITY OPERATION

At all times, including periods of startup, shutdown, and maintenance, Permittee shall, to the extent practicable, maintain and operate the facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the EPA, which may include, but is not limited to, monitoring results, review of operating maintenance procedures and inspection of the facility.

D. MALFUNCTION REPORTING

1. Permittee shall notify EPA by mail, or other means identified by EPA, within 48 hours following the discovery of any failure of air pollution control equipment, process equipment, or of a process to operate in a normal manner, which results in an increase in GHG emissions above the allowable emission limits stated in Section II and III of this permit.
2. Within 10 days of the discovery of any GHG emissions above the allowable emission limits resulting from malfunctions as described in I.D.1., Permittee shall provide a written supplement to the initial notification that includes a description of the malfunctioning equipment or abnormal operation, the date of the initial malfunction, the period of time over which emissions were increased due to the failure, the cause of the failure, the estimated resultant emissions in excess of those allowed in Section II and III, and the methods utilized to mitigate emissions and restore normal operations.
3. Compliance with this malfunction notification provision shall not excuse or otherwise constitute a defense to any violation of this permit or any law or regulation such malfunction may cause.

E. RIGHT OF ENTRY

EPA authorized representatives, upon the presentation of credentials, shall be permitted:

1. to enter the premises where the facility is located or where any records are required to be kept under the terms and conditions of this PSD Permit;
2. during normal business hours, to have access to and to copy any records required to be kept under the terms and conditions of this PSD Permit;
3. to inspect any equipment, operation, or method subject to requirements in this PSD Permit; and,
4. to sample materials and emissions from the source(s).

F. TRANSFER OF OWNERSHIP

In the event of any changes in control or ownership of the facilities to be constructed, this PSD Permit shall be binding on all subsequent owners and operators. Permittee shall notify the succeeding owner and operator of the existence of the PSD Permit and its conditions by letter; a copy of the letter shall be forwarded to EPA Region 6 within thirty days of the letter signature.

G. SEVERABILITY

The provisions of this PSD Permit are severable, and, if any provision of the PSD Permit is held invalid, the remainder of this PSD Permit shall not be affected.

H. ADHERENCE TO APPLICATION AND COMPLIANCE WITH OTHER ENVIRONMENTAL LAWS

Permittee shall construct this project in compliance with this PSD Permit, the application on which this permit is based and all other applicable federal, state, and local air quality regulations. This PSD permit does not release the Permittee from the obligation to obtain a PSD permit for other pollutants emitted in significant amounts or from any liability for compliance with other applicable federal, state and local environmental laws and regulations, including the Clean Air Act.

I. ACRONYMS AND ABBREVIATIONS

AVO	Auditory, Visual, and Olfactory
BACT	Best Available Control Technology
CAA	Clean Air Act
CCS	Carbon Capture and Sequestration
CEMS	Continuous Emissions Monitoring System
CFR	Code of Federal Regulations
CH ₄	Methane
CO ₂	Carbon Dioxide
CO ₂ e	Carbon Dioxide Equivalent
dscf	Dry Standard Cubic Foot
EF	Emission Factor
EPN	Emission Point Number
FIN	Facility Identification Number
FR	Federal Register
GCV	Gross Calorific Value
GHG	Greenhouse Gas
gr	Grains
GWP	Global Warming Potential
HHV	High Heating Value
hr	Hour
lb	Pound
MMBtu	Million British Thermal Units
MSS	Maintenance, Start-up and Shutdown
N ₂ O	Nitrous Oxides
NSPS	New Source Performance Standards
PSD	Prevention of Significant Deterioration
QA/QC	Quality Assurance and/or Quality Control
SCFH	Standard Cubic Feet per Hour
SCR	Selective Catalytic Reduction
SF ₆	Sulfur hexafluoride
TAC	Texas Administrative Code
TCEQ	Texas Commission on Environmental Quality
TPY	Tons per Year
U.S.C.	United States Code

II. Annual Emission Limits and BACT Requirements

FIN	EPN	Description	GHG Mass Basis		TPY CO ₂ e ^{1,2,4}	BACT Requirements
				TPY ¹		
GT-1 GT-2 GT-3 GT-4	GT-1 GT-2 GT-3 GT-4	Natural Gas Fired-Simple Cycle Turbine, each	CO ₂	262,036.50 ³	262,305.79 ³	-BACT limit of 1,100 lb CO ₂ /MW-hr (gross). -Not to exceed 5,000 hours of operation on a 12-month rolling basis per turbine. -See permit condition III.A.2 and 4.
			CH ₄	5.34 ³		
			N ₂ O	0.46 ³		
FWP-1	FWP-1	Firewater Pump Engine	CO ₂	8.66	8.69	- Not to exceed 52 hours of non-emergency operation on a 12-month rolling basis - Use of Good Combustion Practices. See permit condition III.B.
			CH ₄	No Numerical Limit Established ⁵		
			N ₂ O	No Numerical Limit Established ⁵		
CTBR-SF-6	CTBR-SF-6	Fugitive SF ₆ Circuit Breaker Emissions	SF ₆	0.015	342.00	Work Practices. See permit condition III.C.
FUG-1	FUG-1	Components Fugitive Leak Emissions	CH ₄	0.15	3.75	Implementation of AVO Program. See permit condition III.D.
Totals ⁶			CO ₂	1,048,154.66	1,049,577.60	
			CH ₄	21.50		
			N ₂ O	1.82		
			SF ₆	0.02		

1. The TPY emission limits specified in this table are not to be exceeded for this facility and include emissions from the facility during all operations and include MSS activities. All emissions are expressed in terms of short tons.
2. Global Warming Potentials (GWP): CO₂=1, CH₄ = 25, N₂O = 298, SF₆=22,800
3. The GHG Mass Basis TPY limit and the CO₂e TPY limit for the natural gas fired simple cycle turbines applies to each turbine and is not a combined limit.
4. Annual CO₂e emissions, in tons per year (TPY) are based on 365-day rolling basis.
5. All values indicated as "No Numerical Limit Established" are less than 0.01 TPY with appropriate rounding. The emission limit will be a design/work practice standard as specified in the permit.
6. Total emissions include the PTE for fugitive emissions. Totals are given for informational purposes only and do not constitute emission limits.

III. SPECIAL PERMIT CONDITIONS

A. Requirements for the Natural Gas Fired-Simple Cycle Turbines (EPNs GT-1, GT-2, GT-3 and GT-4)

1. **Fuel Specifications:** The fuel for each turbine shall be pipeline quality natural gas.

2. **Turbine BACT Requirements:**

- a. The limit of 1,100 lbs of CO₂/MW-hr gross output is based on each turbine's daily average of CO₂ emissions measured using a Continuous Emissions Monitoring System (CEMS) and divided by each turbine's measured gross electrical output. The Permittee shall calculate each day a combustion turbine operates, CO₂ emissions over the rolling 5,000 hours of operation basis divided by gross electrical output over the same period for comparison to the limit for each combustion turbine.
- b. The permittee shall calculate, on a daily basis, the amount of CO₂e emitted from each turbine in tons per year on a 365-day rolling basis based on the measurement of the CO₂ CEMS and the procedures and Global Warming Potentials (GWP) contained in the Greenhouse Gas Regulations, 40 CFR Part 98, Subpart A, Table A-1, as published on November 29, 2013 (78 FR 71948) for CH₄ and N₂O. Compliance shall be based on a 365-day rolling basis.
- c. The annual quantity of fuel used by each turbine (EPNs GT-1, GT-2, GT-3 and GT-4) shall not exceed 4,136,000 MMBtu (HHV). The permittee shall calculate, each day a combustion turbine operates, the quantity of fuel used by each turbine over the trailing 365-day rolling basis by multiplying the gross calorific value of the fuel combusted by volume of fuel metered for comparison to the annual fuel limit for each combustion turbine.
- d. Each turbine (EPNs GT-1, GT-2, GT-3 and GT-4) is limited to 5,000 operational hours on a 12-month rolling basis which shall include periods of startup and shutdown.

3. **Turbine Work Practice and Operational Requirements:**

- a. The permittee shall measure the pounds of CO₂ emitted hourly from each turbine from the procedure provided in 40 CFR 75.10(a)(3)(i) (direct emission measurement using CEMS). The CEMS required by this permit shall be installed, calibrated, operated, audited, tested and maintained in accordance with the manufacturer's recommendations and the appropriate performance standards and quality assurance requirements in the appendices of either 40 CFR Part 60 or 40 CFR Part 75.
- b. For each turbine, a CO₂ CEMS and volumetric stack gas flow monitoring system with an automated data acquisition and handling system for measuring and recording CO₂ emissions discharged to the atmosphere shall be installed and operated for all operating hours, including startup and shutdown. The measurement from each turbine's CO₂ CEMS shall be used to show compliance with the emission limit in Table 1.

- c. The permittee shall ensure that all required CO₂ monitoring system/equipment are installed and all certification tests are completed on or before the earlier of 90 unit operating days or 180 calendar days after the date the unit commences operation.
- d. The permittee shall maintain the following records for at least five years from the date or origin:
 - i. One-hour measured CO₂ emission averages.
 - ii. The results of all calibration and linearity checks.
 - iii. RATA test plans and reports of test results.
- e. The permittee shall ensure compliance with the specifications and test procedures for CO₂ emission monitoring system at stationary sources, 40 CFR Part 75, or 40 CFR Part 60, Appendix B, Performance Specification numbers 1 through 9, as applicable.
- f. The permittee shall calculate the pounds of CH₄ and N₂O emitted each calendar day by using the default CH₄ and N₂O emission factors contained in Table C-2 of 40 CFR 98, as in effect as of the date of permit issuance, and the measured actual hourly heat input (HHV).
- g. For each turbine, fuel metering shall include:
 - i. Measurement and recording of the natural gas flow rate using an operational non-resettable elapsed flow meter installed at each turbine inlet.
 - ii. Recording the total amount of fuel combusted for each turbine on a hourly basis.
 - iii. The fuel gross calorific value (GCV) [high heat value (HHV)], carbon content and, if applicable, semi-annually by the procedures contained in 40 CFR Part 98.34(b)(3). Records of the fuel GCV shall be maintained for a minimum period of five years. Upon request, permittee shall provide a sample and/or analysis of the fuel that is fired in any unit covered by this permit at the time of the request, or shall allow a sample to be taken by EPA for analysis.
- h. Permittee shall calibrate and perform preventative maintenance check of the fuel gas flow meters and document annually.
- i. The gross energy output [MWh (gross)] for each turbine shall be measured and recorded on an hourly basis.
- j. Permittee shall substitute data per the Missing Data Substitution Procedures specified under 40 CFR Part 75, Subpart D.

4. Startup and Shutdown Requirements for Turbines:

- a. Permittee shall minimize emissions during startup and shutdown activities by operating and maintaining the facility and associated air pollution control equipment in accordance with good air pollution control practices, safe operating practices, and protection of the facility.
 - i. A startup of each turbine is defined as the period that begins when there is measureable fuel flow to the turbine and ends when the turbine load reaches 50 percent. A startup time is limited to 10 minutes.
 - ii. A shutdown of each turbine is defined as the period that begins when the

turbine load falls below 50 percent and ends when there is no longer measureable fuel flow to the turbine. A shutdown is limited to 10 minutes.

- b. Emissions during each startup and shutdown activity as well as annual startup and shutdown activities shall be minimized by limiting the duration of operation in startup and shutdown mode as follows:
 - i. Startups and shutdowns are limited to no more than 10 minutes per event.
 - ii. No more than 832 startup and shutdown events per turbine on a 12-month rolling basis.

B. Requirements for the Firewater Pump Engine (EPN: FWP-1)

1. Fuel Specification: The fuel for the firewater pump is limited to No. 2 fuel oil.

2. Firewater Pump Work Practice and Operational Requirements:

- a. The firewater pump shall not exceed 52 hours of non-emergency operation on a 12-month rolling basis and shall be operated and maintained in accordance with the manufacturer's recommendations.
- b. The permittee shall install and maintain an operational non-resettable run time meter for the firewater pump.
- c. The permittee shall install and maintain a non-resettable elapsed flue flow meter for the firewater pump.
- d. The engine shall meet the applicable monitoring and recordkeeping requirements as required in 40 CFR Part 60 Subpart IIII, Standards of Performance for Stationary Compression Ignition Internal Combustion Engines.

C. Requirements for Minimizing Fugitive Emissions from SF₆ Circuit Breaker (EPN: CTBR-SF6)

Fugitive SF₆ Circuit Breaker Work Practice and Operational Requirements:

- a. For EPN CTBR-SF6, SF₆ emissions shall be calculated annually (calendar year) in accordance with the mass balance approach provided in equation DD-1 of the Mandatory Greenhouse Gas Reporting Rule for Electrical Transmission and Distribution Equipment Use, 40 CFR Part 98, Subpart DD. The total SF₆ inventory of the circuit breakers shall not exceed 6,180 lb with leak detection.
- b. The circuit breakers shall be equipped with a low pressure alarm and low pressure lockout.

D. Requirements for Minimizing Fugitive Leaks from Natural Gas Components (EPN: FUG-1)

Components Fugitive Leaks Work Practice and Operational Requirements:

- a. The permittee shall implement an auditory/visual/olfactory (AVO) monitoring program for detecting leaking in recovered process fuel gas and natural gas piping

- components, including valves and flanges.
- c. AVO monitoring shall be performed daily.
- d. Any component found to be leaking during AVO monitoring shall be repaired within 15 days.
- e. Records of the daily AVO monitoring results must be maintained on site.

IV. Recordkeeping and Reporting

A. Records

1. In order to demonstrate compliance with the GHG emission limits in Table 1, the permittee will monitor the following parameters and summarize the data as specified in Special Conditions III. A, B, C and D.
 - a. Operating hours for all air emission sources authorized by this permit;
 - b. Records of the fuel consumed by each source authorized by this permit;
 - c. Records of run time meter and fuel flow meter measurements for the fire pump engine;
 - d. The fuel usage for all turbines, and engine, using continuous fuel flow monitors (a group of equipment can utilize a common fuel flow meter, as long as actual fuel usage is allocated to the individual equipment based upon actual operating hours and maximum firing rate) A computer that collects, sums, and stores electronic data from continuous fuel flow meters is an acceptable totalizer;
 - e. Semi-annual fuel sampling for natural gas or other frequencies as allowed by 40 CFR Part 98 Subpart C §98.34(b)(3).
2. Permittee shall maintain records of the following for the Equipment List: all final records or reports pertaining to significant maintenance performed; duration of startup, shutdown; the initial startup period for the emission units; malfunctions that could affect the Equipment's ability to meet the limits in this permit; all records relating to performance tests, calibrations, checks, and monitoring of combustion equipment required by this permit; duration of an inoperative monitoring device and emission units with the required corresponding emission data; and all other information required by this permit recorded in a permanent form suitable for inspection. These records may be maintained in electronic databases. The records must be retained for not less than five years following the date of their creation.
3. Permittee shall maintain records of all GHG emission units and CO₂ emission certification tests and monitoring and compliance information required by this permit.
4. Permittee shall maintain reports and documents pertaining to the maintenance performed and compliance with the Monitoring and Quality Assurance and Quality Control (QA/QC) procedures outlined in 40 CFR 98.304 for SF₆ circuit breakers.
5. Permittee shall maintain records and submit a written report of all excess emissions to EPA semi-annually, except when: more frequent reporting is specifically required by an applicable subpart; or the Administrator or authorized representative, on a case-by-case basis, determines that more frequent reporting is necessary to accurately assess the compliance status of the source. The report is due on the 30th day following the end of each semi-annual period and shall include the following:

- a. Time intervals, date and magnitude of the excess emissions, the nature and cause (if known), corrective actions taken and preventive measures adopted;
 - b. Time and date of each period during which the monitoring equipment was inoperative (monitoring down-time);
 - c. If there has been no excess emissions or monitoring downtime during the reporting period, a statement to that effect;
 - d. Any failure to conduct any required source testing, monitoring, or other compliance activities; and
 - e. Any violation of limitations on operation, including but not limited to restrictions on hours of operation of the emergency generator or fire pump.
6. Excess emissions shall be defined as any period in which the facility emissions exceed a maximum emission limit set forth in this permit, a malfunction occurs of an emission unit listed in the Equipment List that results in excess GHG emissions, or any other unauthorized GHG emissions occur.
 7. Excess emissions indicated by GHG emission source certification testing or compliance monitoring shall be considered violations of the applicable emission limit for the purpose of this permit.
 8. All records required by this PSD Permit shall be retained for not less than 5 years following the date of such measurements, maintenance, and reporting.

V. Initial Performance Testing Requirements:

- A. The Permittee shall perform stack sampling and other testing to establish the actual pattern and quantities of CO₂ emissions being emitted into the atmosphere from the four turbines (EPN GT-1, GT-2, GT-3 and GT-4) and to determine the initial compliance with the CO₂ emission limits established in this permit. Sampling shall be conducted in accordance with 40 CFR § 60.8 and EPA Method 3A or 3B for the concentration of CO₂.

The stack test shall consist of three separate runs at or above 90% of maximum load operations and three separate runs below 70% but above 50% load operation. Stack gas flow rate measurements, as well as moisture measurements (if needed), shall be made during each test run. The electrical generation (gross megawatts) during each test run shall also be recorded. The CO₂ emission rate shall be calculated as defined below and recorded for each test run in lb CO₂/MWh (gross) and lb CO₂/hr. The arithmetic mean for the three test runs at or above 90% of maximum load operation and the arithmetic mean for the three test runs below 70% but above 50% load operation shall also be calculated and recorded.

1. The CO₂ hourly average emission rate determined by the three runs at or above 90% of maximum load by 5,000 hours.
2. If the above calculated CO₂ emission total does not exceed the (TPY) specified on Table 1, no compliance strategy needs to be developed.
3. If the above calculated CO₂ emission total exceeds the (TPY) specified in Table 1, the facility shall;
 - a. Document the exceedance in the test report; and

b. Explain within the report how the facility will assure compliance with the CO₂ emission limit listed in Table 1.

- B. Within 60 days after achieving the maximum production rate at which the affected facility will be operated, but not later than 180 days after initial startup of the facility, performance tests(s) must be conducted and a written report of the performance testing results furnished to the EPA. Additional sampling may be required by TCEQ or EPA.
- C. Permittee shall submit a performance test protocol to EPA no later than 30 days prior to the test to allow review of the test plan and to arrange for an observer to be present at the test. The performance test shall be conducted in accordance with the submitted protocol, and any changes required by EPA.
- D. Performance tests must be conducted under such conditions to ensure representative performance of the affected facility. The owner or operator must make available to the EPA such records as may be necessary to determine the conditions of the performance tests.
- E. The owner or operator must provide the EPA at least 30 days' prior notice of any performance test, except as specified under other subparts, to afford the EPA the opportunity to have an observer present and/or to attend a pre-test meeting. If there is a delay in the original test date, the facility must provide at least 7 days prior notice of the rescheduled date of the performance test unless EPA approves an earlier rescheduled date due to unforeseen events, such as delays that are caused by weather.
- F. The owner or operator shall provide, or cause to be provided, performance testing facilities as follows:
 - 1. Sampling ports adequate for test methods applicable to this facility,
 - 2. Safe sampling platform(s),
 - 3. Safe access to sampling platform(s), and
 - 4. Utilities for sampling and testing equipment.
- G. To verify continued performance at permitted emission limits, the permittee shall conduct its initial and annual CO₂ CEMS relative accuracy test audit (RATA), in accordance with 40 CFR Part 60, Appendix F, Procedure 1, and 40 CFR 75, Appendix B, Section 2.3.1 to evaluate compliance of each turbine with the emission standards on a continuous basis. The initial CO₂ CEMS RATA shall be on or before the earlier of 90 unit days or 180 calendar days after the date the unit commences operation.

VI. Agency Notifications

Permittee shall submit GHG permit applications, permit amendments, and other applicable permit information to:

Multimedia Planning and Permitting Division
EPA Region 6
1445 Ross Avenue (6PD-R)
Dallas, TX 75202
Email: Group R6AirPermits@EPA.gov

Permittee shall submit a copy of all compliance and enforcement correspondence as required by

this Approval to Construct to:

Compliance Assurance and Enforcement Division
EPA Region 6
1445 Ross Avenue (6EN)
Dallas, TX 75202

