



**UNITED STATES ENVIRONMENTAL PROTECTION  
AGENCY**

**REGION 6  
1201 ELM STREET, SUITE 500  
DALLAS, TEXAS 75270-2102**

February 16, 2023

TRANSMITTED VIA EMAIL

Craig Eckberg  
Senior Director, Environmental Services  
Petra Nova Parish Holdings LLC  
910 Louisiana Street  
Houston, TX 77002  
craig.eckberg@nrg.com

Re: Cogeneration Cycle Combustion Turbine with Heat Recovery Steam Generator (CTHRSG) at NRG Texas Power W.A. Parish Electric Generating Station, Carbon Capture Plant, Thompsons, Fort Bend County, Texas – Flue Gas Carbon Capture (FGCC) Demonstration Unit, W.A. Parish Unit 8 – Performance Testing Extension Request – 40 Code of Federal Regulations (CFR) Part 63 Subpart A General Provisions and Subpart YYYYY – National Emission Standards for Hazardous Air Pollutants for Stationary Combustion Turbines

Dear Mr. Eckberg:

This letter is in response to your requests, dated September 2 and 26, 2022, respectively, for an extension of time for Petra Nova Parish Holdings and NRG Texas Power (Petra Nova/NRG) to complete annual performance testing on the FGCC CTHRSG at the W.A. Parish Electric Generating Station Unit 8, as required by 40 CFR Part 63 Subpart YYYYY. The CTHRSG is subject to the formaldehyde limits of § 63.6100 and Tables 1 and 2, and associated testing requirements of § 63.6120 and Table 3.

In making its request for extension, Petra Nova/NRG noted that it had provided notification on December 20, 2020, to the Electric Reliability Council of Texas that year-round operation of the FGCC unit has been indefinitely suspended and has not resumed. On May 8, 2022, Unit 8 experienced a substantial fire that resulted in an extended maintenance outage. As a result, and because the FGCC unit is not operating, it is not technically or economically feasible to run the CTHRSG. Also, as of June 26, 2021, the CTHRSG does not have a contract with a natural gas supplier, which would be required to restart the unit.

Pursuant to 40 CFR § 63.6(i)(6), NRG Texas provided the required information in support of its request for compliance and testing extension. EPA has determined that Petra Nova/NRG's request meets the criteria of 40 CFR § 63.6(i)(4)(i)(C) regarding submission of the request before the otherwise applicable compliance date, and that the need for the extension arose due to circumstances beyond reasonable control of Petra Nova/NRG. Based upon a review of all available information that Petra Nova/NRG has submitted, the United States Environmental Protection Agency (EPA) has determined that the conditions which have been described meet the

required criteria for a nontrivial request for extension, and hereby approves the request in accordance with § 63.7(i)(8)-(10), as further explained in this response.

In its request, Petra Nova/NRG indicated that it will conduct the formaldehyde performance testing required by Subpart YYY for the CTHRSRG within 45 operating days following "startup," as defined under Subpart YYY at § 63.6175. EPA agrees that this is a reasonable time frame in which to complete the testing. Petra Nova/NRG must submit the notification of intent to conduct the initial performance test to TCEQ (via email) and to EPA (electronically via the *Compliance and Emissions Data Reporting Interface* (CEDRI) portal) at least 60 calendar days before the test is scheduled to begin, as required by 40 CFR § 63.6145(e). Other requirements of §§ 60.8(c) and (d), and applicable requirements of § 63.6120 and Table 3, pertaining to representative conditions for performance testing, must also be met. Petra Nova/NRG also must continue to meet its new source review state air permit limits and other applicable permit conditions, until and after the CTHRSRG is operating again.

A copy of the testing extension approval will be transmitted to the Texas Commission on Environmental Quality (TCEQ) for attachment to the facility's Title V permit, and inclusion in the facility's compliance records for federal enforcement. Questions regarding EPA's approval of Petra Nova/NRG's request for testing extension may be directed to Diana Lundelius of my staff at 214-665-7468 or [lundelius.diana@epa.gov](mailto:lundelius.diana@epa.gov).

Sincerely,

STEVEN

THOMPSON

Digitally signed by STEVEN THOMPSON  
Date: 2023.02.16 14:10:42 -0600

Steve Thompson

Chief

Air Enforcement Branch

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