

April 20, 2026

Via Email: AirPermits@azdeq.gov

Ms. Karla Murrieta  
Air Permit Manager, Air Quality Division  
Arizona Department of Environmental Quality  
1110 West Washington Street  
Phoenix, AZ 85007

**Re: Additional information, Reopener for GT5/GT6 Turbine Installation  
Apache Generating Station, Reopener No. 113040**

Dear Ms. Murrieta:

Thank you for your inquiry about the basis for the particulate matter values used in the Apache GT5/GT6 permit application. As stated in the application, the values were provided by the vendor, ProEnergy Services. AEPCO has asked the vendor to reaffirm the values in a more formal manner. The enclosed letter from ProEnergy Services' Vice President, Commercial Operations, should address your questions.

Also attached is a general explanation for ADEQ's consideration for use in a technical support document or responsiveness summary.

We hope that this information meets ADEQ's needs. Please let us know if we can provide any further assistance and look forward to completion of this permitting action.

I certify, after reasonable inquiry of those who prepared these materials, that this response is true, complete and accurate.

Sincerely yours,



Michelle Freark  
Executive Director Regulatory Affairs and Corporate Services

Attachment 1 – Letter from ProEnergy Services  
Attachment 2 – General Explanation for TSD

# **ATTACHMENT 1**

March 4, 2026

AEPCO  
1000 S. Hwy 80  
Benson, AZ 85602  
Attn: Chris Jimenez, Chief Development Officer

Subject: Apache 1 Expected Particulate Matter Levels

Dear Mr. Jimenez:

This letter is in regards to the emissions levels within the Apache 1 EPC Agreement dated November 8, 2022, between PROENERGY Services, LLC and Arizona Electric Power Cooperative (“the Agreement”).

Consistent with the Performance and Emissions Estimate, Revision 5, provided by PROENERGY for the Apache 1 gas turbines GT 5 and 6, PROENERGY does not expect the combined PM2.5/PM10 to exceed 3.65 lb/hr during any operating scenario permitted under the Agreement, including start-up and shut down conditions. The expectation is set based on both theoretical modeling and empirical data from existing operating LM6000 facilities and subject to the following assumptions:

- PM emissions shall be determined by sampling, analysis and calculation in accordance with 40 CFR 60 Appendix A, Reference Methods 5 and 202.
- Fuel analysis shall be collected on the day of the test per ASTM D-1945, which shall include Sulfur content not to exceed 0.4 grains Sulfur/100 scf fuel.

This letter is being provided at the request of AEPCO on the condition that it shall not be construed as replacing, adding to, or modifying in any way PROENERGY’s contractual warranties or performance guarantees or introduce any other contractual obligations or form of liability on the part of PROENERGY not already contemplated within the Agreement.

Please do not hesitate to contact us with any further questions.

Sincerely,



Landon Tessmer  
VP, Commercial Operations

# **ATTACHMENT 2**

In *In the matter of Arizona Electric Power Cooperative, Inc., Apache Generating Station, Permit No. 69734*, Petition No. IX-2024-21 (Sept. 16, 2025) (hereinafter 2025 Order), the EPA Administrator issued an order granting in part and denying in part Sierra Club's petition for an objection to certain operating conditions. In particular, Sierra Club sought an objection because the permit did not contain a numeric approach to including startup/shutdown particulate matter emissions in the compliance determination. See 2025 Order at 17. To address the 2025 Order, ADEQ issued Permit Reopening No. 113040, which added conditions requiring AEPCO to track the number of startups and shutdowns and to calculate particulate matter emissions for each hour based on the load and an associated emission factor and, for any hour in which a startup, shutdown, or both occur, to substitute 3.65 lbs (or a higher value derived from stack testing) for that hour. Permit Reopening No. 113040, Condition VI.D.2.a & VI.D.3.a. The new conditions address the 2025 Order's direction to ADEQ to provide a method to determine compliance with the 9.9 ton/year limit including consideration of startup and shutdown emissions.

In comments on Reopener 113040, Sierra Club stated that the basis for the 3.65 lb/hr startup/shutdown factor should be included in the administrative record. The basis for the 3.65 lb/hr was included in the emissions calculations in the original application. AEPCO July 2023 Application, at 3-1 & App. C. In addition, AEPCO has supplied a letter from ProEnergy Services, the vendor of GT5 and GT6, which states that "for the Apache 1 gas turbines GT5 and 6, PROENERGY does not expect the combined PM2.5/PM10 to exceed 3.65 lb/hr during any operating scenario ..., including start-up and shut down conditions." A copy of this letter is in the administrative record. The vendor's representation states that the 3.65 lb/hr value includes startup and shutdown conditions. AEPCO's Apache Station is fueled by pipeline quality natural gas, which is limited to less than 0.5 gr sulfur per 100 cubic feet. The vendor's representation, the use of pipeline quality natural gas, and the permit condition requiring use of a higher tested particulate matter value, if the most recent test value is higher than the vendor's estimate, provides a reasonable assurance of compliance with the annual limit.