



309 East 11th St., Suite 2 • Austin, Texas 78701 • 512.477.1155 • www.citizen.org

Office of the Chief Clerk, MC 105
TCEQ
PO Box 13087
Austin, TX 78711-3087
Via online comment portal and by hand delivery.

April 24, 2025

Re: Public Citizen Comments on Proposed Air Quality Permit No. 177380, PSDTX1650, and GHGPSDTX244

Public Citizen appreciates the opportunity to provide these comments. We would welcome the opportunity to discuss our recommendations further. Please contact Kamil Cook at kcook@citizen.org, 512-477-1155.

This plant would seriously harm this community

The folks living in Blue, Adina, and other places in rural Lee County are vulnerable to the emissions from this plant. The hundreds of tons of emissions, the loud sounds of the dry-cooling system, and the increased traffic from this plant would negatively impact their lives and livelihood.

This permit would allow the release of hundreds of tons noxious emissions per year. These include over 250 tons per year of NO_x, over 50 tons per year of SO₂, over 150 tons per year of particulate matter, over 160 tons per year of CO, and almost 4 million tons of CO₂ a year.

It will be releasing all these emissions because it will operate for around 8,076 hours out of the year. This means that it will not run for only around 29 days a year. No matter how many emissions protections that they add to this plant, this plant will emit a significant amount of emissions that will negatively affect the health and quality of life of surrounding communities, flora, and fauna.

And even if these emissions are within standards granted by the TCEQ, they could still negatively impact housing and property prices. Similarly, the traffic caused by trucks going in and out and constant construction will be a nuisance to the lives of the people living within miles of this plant.

This will utilize a dry-cooling system which is notoriously louder than wet-cooling systems because of the vents and fans that are required to cool the plant. This is especially relevant given the size of this plant. While noise is not something that is considered in the issuance of a permit, it is a serious concern for surrounding communities.



309 East 11th St., Suite 2 • Austin, Texas 78701 • 512.477.1155 • www.citizen.org

As SL Energy says in its own documents, that only 80MW of energy would be available to the public at peak use.¹ And this is only until all of their electricity is purchased by private off takers. Additionally, SL Energy is the owner of 31,000 acres of land that they have stated they would like to develop into something similar to The Woodlands, a community development outside of Houston. This means that when the next serious environmental disaster happens in Texas, this plant will likely not be able to supply power to these people, leaving these folks in the dark while the people living in the community development may have light, power, and AC.

This permit would also affect the air quality standards of metropolitan Austin

This plant is located less than an hours' drive from downtown Austin. The emissions from this plant could certainly push the Austin metropolitan area into non-attainment for NAAQS standards. Austin has been teetering on non-attainment and the significant emissions from this plant could push downtown Austin into non-attainment. This permit not only poses a health and environmental threat to the people here, but also to people as far away as Austin. There should be a thorough study conducted of the air quality ramifications for metropolitan Austin as well.

Conclusion

Again, we appreciate the opportunity to provide these comments. If you wish to discuss the issues raised, please contact Kamil Cook at kcook@citizen.org, 512-477-1155.

Respectfully,

Kamil Cook

Clean Energy Associate, Public Citizen

¹ See TCEQ, Preliminary Determination Study for Air Permit 177380 (3/14/2025).