

ENVIRONMENTAL PERMIT TRANSFER FOR TEXAS POWER GENERATION FACILITY

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PROJECT OVERVIEW

ESE supported an environmental permit transfer for a fossil fuel electric power generation facility in West Texas. The engagement was initiated as part of an ownership and operator transition requiring updates across state and federal environmental programs. The scope focused on maintaining regulatory continuity for air, stormwater, waste, and federal reporting obligations during the transaction period.

CHALLENGES

The facility operated under multiple environmental authorizations regulated by TCEQ and EPA, including New Source Review air permits, a Title V Federal Operating Permit, industrial stormwater coverage, solid waste registration, RCRA generator identification, Acid Rain Program registration, and greenhouse gas reporting records. Several inactive, expired, or cancelled authorizations also required review to confirm whether residual closure, compliance, or administrative obligations could affect the transfer. The primary challenge was coordinating multiple regulatory pathways without disrupting active permit coverage.

ESE'S APPROACH

ESE developed a structured permit transfer strategy beginning with a comprehensive records review and pre-transfer assessment. The team cross-referenced state and federal databases, identified applicable transfer forms and procedural requirements, and coordinated required documentation with the new owner/operator. ESE prepared and managed agency submittals to support timely administrative updates and defensible regulatory documentation.

KEY ELEMENTS IMPLEMENTED

- Compiled a permit transfer matrix covering active, inactive, expired, and cancelled authorizations
- Prepared TCEQ change-of-ownership documentation for air permits and Title V records
- Coordinated stormwater change-of-operator documentation under the TPDES MSGP program
- Prepared solid waste registration transfer materials for TCEQ review
- Updated federal program records for RCRA, Acid Rain Program, Title V coordination, and GHGRP applicability
- Tracked agency processing, correspondence, acknowledgments, and close-out documentation

RESULTS

The engagement provided the client with a clear regulatory roadmap for transferring environmental authorizations during the facility ownership transition. ESE's review helped identify required state and federal actions, anticipated agency timelines, and potential compliance considerations tied to inactive or expired records. The process reduced administrative risk and supported continuity of permit coverage.

PROJECT IMPACT

By organizing the transfer across multiple environmental programs, ESE helped establish a defensible compliance record for the new owner/operator. The final documentation framework supported agency communication, internal accountability, and future audit readiness. The approach also created a repeatable model for managing complex environmental permit transfers at regulated industrial facilities.