Section 2
Application Tables 2-A through 2-P

These tables were not completed because this permit application is for a 20.2.72 NMAC Technical Revision with no change in facility operations, facility equipment, or increase in facility emissions.

NMED EX. 3c

Section 3

Application Summary

The **Application Summary** shall include a brief description of the facility and its process, the type of permit application, the applicable regulation (i.e. 20.2.72.200.A.X, or 20.2.73 NMAC) under which the application is being submitted, and any air quality permit numbers associated with this site. If this facility is to be collocated with another facility, provide details of the other facility including permit number(s). In case of a revision or modification to a facility, provide the lowest level regulatory citation (i.e. 20.2.72.219.B.1.d NMAC) under which the revision or modification is being requested. Also describe the proposed changes from the original permit, how the proposed modification will effect the facility's operations and emissions, de-bottlenecking impacts, and changes to the facility's major/minor status (both PSD & Title V).

Routine or predictable emissions during Startup, Shutdown, and Maintenance (SSM): Provide an overview of how SSM emissions are accounted for in this application. Refer to "Guidance for Submittal of Startup, Shutdown, Maintenance Emissions in Permit Applications (http://www.nmenv.state.nm.us/aqb/permit/app_form.html) for more detailed instructions on SSM emissions.

The San Juan Generating Station (SJGS) is a four-unit coal fired electric steam generating facility. Each unit consists of a pulverized coal, wall fired, dry bottom boiler. Foster Wheeler manufactured the unit 1 and 2 boilers and Babcock and Wilcox manufactured the units 3 and 4 boilers. Unit 2 was constructed first, followed by units 1, 3, and 4. The units are numbered from south to north. Unit 1 is the furthest south.

The current coal source for SJGS is the adjacent BHP Billiton San Juan Coal Company's San Juan Mine. All current and foreseeable mining at the San Juan Coal Mine is underground. The maximum SJGS annual coal usage (all four units combined) is 8,200,000 tons.

Coal from the San Juan Mine is delivered to SJGS by conveyor. From the main delivery point, coal is distributed by conveyors to the individual units, pulverized and sent to the boilers for combustion. Heat from the combustion process is used to produce superheated steam, which in turn drives steam turbines on each unit. Units 1, 3, and 4 have General Electric turbines and Unit 2 has a Westinghouse turbine. The nominal gross generating capacity for each turbine is:

Unit 1: 361 MW
Unit 2: 350 MW
Unit 3: 544 MW
Unit 4: 544 MW

The nominal, gross station-wide electrical production capacity is 1,799 MW.

The maximum heat input values for each combustion boiler units 1-4 are:

Unit 1: 3,707 mmBtu/hr
Unit 2: 3,688 mmBtu/hr
Unit 3: 5,758 mmBtu/hr
Unit 4: 5,649 mmBtu/hr,

After the turbines have extracted energy from the steam, the steam is condensed back to liquid phase, using forced draft cooling towers for heat rejection, and recycled back to the boilers.

Raw water for use at SJGS is obtained from the San Juan River, approximately 3.5 miles southeast of SJGS. Raw water from the river is pumped to a raw water reservoir near the plant. SJGS includes a complex processing system for boiler water, cooling water and other water treatment to produce water with the required quality and properties.

This water treatment system includes systems for treating and recycling water and for disposal of wastewater streams.

SJGS currently operates under Operating Permit P-062R2 and NSR Permit 0063-M6R1. This technical revision permit application for NSR Permit 0063-M6R1 is applied for under regulation 20.2.72.219.B.1 NMAC.

This 20.2.72.219.B.1 NMAC technical permit revision application has been submitted to support the NMED's State Implementation Plan (SIP) to satisfy the requirements in Section 110(a)(2)(D)(i)(II) of the Clean Air Act with respect to visibility. To satisfy these requirements, PNM proposes additional and revised emission limit for SO_2 emissions from the four coal-fired boilers located at SJGS, Units 1-4 (Emission Sources E301, E302, E303, and E304). The following are PNMs suggested permit condition language and methodology for demonstrating compliance with monitoring, recordkeeping, and reporting for the proposed SO_2 emission limits from the four coal-fired boilers located at SJGS, Units 1-4 (Emission Sources E301, E302, E303, and E304).

Proposed Emission Limits

SO_2 30-day Rolling Average
San Juan Generating Station shall not cause to be discharged into the atmosphere any gases that contain SO_2 in excess of 0.15 lb/MMBtu heat input determined on a 30-day rolling average basis from combustion boilers units 1-4 (Emission Sources E301, E302, E303, and E304).

Compliance with the 0.15 lb/MMBtu heat input 30-day rolling average SO_2 emission limitation is determined by calculating at the end of each rolling 30 successive boiler operating days the arithmetic average of all hourly emission rates for SO_2, except for data obtained during emergency conditions. Hourly emission rates will only be determined based on valid SO_2 CEMs data for any hour where fuel is combusted in the unit. No missing hour substitute data will be used in determining compliance with the proposed 0.15 lb/MMBtu heat input 30-day rolling average SO_2 emission limit.

"Boiler operating day" means a 24-hour period between 12 midnight and the following midnight (MST) during which any fuel is combusted at any time in the steam-generating unit.

Annual Limit
Compliance with the proposed 0.15 lb/MMBtu heat input 30-day rolling average SO_2 emission limitation, will in effect, reduce the annual SO_2 tons per year (tpy) emission rate presently listed in NSR Permit 0063-M6R1 and Operating Permit P-62R2 for each combustion boiler. The present annual SO_2 emission limit for each unit in NSR Permit 0063-M6R1 are:

Unit 1 – 7045.8 tpy
Unit 2 – 7009.5 tpy
Unit 3 – 10944.4 tpy
Unit 4 – 10736.9 tpy

The present annual SO_2 emission limit for each unit in Operating Permit 62R2 is:

Unit 1 – 3159 tpy
Unit 2 – 3143 tpy
Unit 3 – 4907 tpy
Unit 4 – 4814 tpy

For this permit application, the calculations of the annual SO_2 emission limit are based on the proposed 0.15 lb/MMBtu heat input 30-day rolling average SO_2 emission limitation, operating at 8760 hours per year, and the maximum heat input values. The proposed annual SO_2 emission limit for each combustion boiler unit is:

Unit 1 – 2435 tpy
Unit 2 – 2423 tpy

Unit 3 – 3783 tpy
Unit 4 – 3711 tpy

This equates to a facility-wide annual SO_2 emission limit reduction of 3670 tpy under previous permits.

Compliance with the annual SO_2 emission limitation is determined by calculating at the end of each year the arithmetic average of all hourly emission rates for SO_2, except for data obtained during emergency conditions. Hourly emission rates will only be determined based on valid SO_2 CEMs data for any hour where fuel is combusted in the unit. No missing hour substitute data will be used in determining compliance with the proposed annual SO_2 emission limit.

Monitoring Requirement
SJGS's NSR Permit 0063M6R1 presently has monitoring conditions in the permit that requires continuous emissions monitoring systems (CEMS) for measuring SO_2 emissions. This present system will be used to determine compliance with the proposed 0.15 lb/MMBtu heat input 30-day rolling average SO_2 emission limit and annual SO_2 emission limit on a unit-specific basis using data from SO_2 CEMS that have been installed, calibrated, and operated in accordance with 40 CFR 75.

Recordkeeping Requirement
SJGS's NSR Permit 0063M6R1 presently has recordkeeping conditions in the permit that specifies recording requirements for continuous emissions monitoring systems (CEMS) data for measuring SO_2 emissions per 40 CFR 75. This present system will be used to record compliance with the proposed 0.15 lb/MMBtu heat input 30-day rolling average SO_2 emission limit.

Reporting Requirement
SJGS's NSR Permit 0063M6R1 presently has reporting conditions in the permit that specifies reporting requirements for continuous emissions monitoring systems (CEMS) data for measuring SO_2 emissions per 40 CFR 75. This present system will be used to report compliance with the proposed 0.15 lb/MMBtu heat input 30-day rolling average SO_2 emission limit.

Section 4

Process Flow Sheet

A **process flow sheet** and/or block diagram indicating the individual equipment, all emission points and types of control applied to those points. The unit numbering system should be consistent throughout this application.

This section was not completed because this permit application is for a 20.2.72 NMAC Technical Revision with no change in facility operations, facility equipment, or increase in facility emissions.

Section 5

Plot Plan Drawn To Scale

A **plot plan drawn to scale** showing emissions points, structures, tanks, and fences of property owned, leased, or under direct control of the applicant. The unit numbering system should be consistent throughout this application.

This section was not completed because this permit application is for a 20.2.72 NMAC Technical Revision with no change in facility operations, facility equipment, or increase in facility emissions.

Section 6

All Calculations

Show all calculations used to determine both the hourly and annual controlled and uncontrolled emission rates. All calculations shall be performed keeping a minimum of three significant figures. Document the source of each emission factor used (if an emission rate is carried forward and not revised, then a statement to that effect is required). If identical units are being permitted and will be subject to the same operating conditions, submit calculations for only one unit and a note specifying what other units to which the calculations apply. All formulas and calculations used to calculate emissions must be submitted. The "Calculations" tab in the UA2 has been provided to allow calculations to be linked to the emissions tables. Add additional "Calc" tabs as needed. If the UA2 or other spread sheets are used, all calculation spread sheet(s) shall be submitted electronically in Microsoft Excel compatible format so that formulas and input values can be checked. Format all spread sheets and calculations such that the reviewer can follow the logic and verify the input values. Define all variables. If calculation spread sheets are not used, provide the original formulas with defined variables. Additionally, provide subsequent formulas showing the input values for each variable in the formula. All calculations, including those calculations are imbedded in the Calc tab of the UA2 portion of the application, the printed Calc tab(s), should be submitted under this section.

Tank Flashing Calculations: The information provided to the AQB shall include a discussion of the method used to estimate tank-flashing emissions, relative thresholds (i.e., NOI, permit, or major source (NSPS, PSD or Title V)), accuracy of the model, the input and output from simulation models and software, all calculations, documentation of any assumptions used, descriptions of sampling methods and conditions, copies of any lab sample analysis. If Hysis is used, all relevant input parameters shall be reported, including separator pressure, gas throughput, and all other relevant parameters necessary for flashing calculation.

SSM Calculations: It is the applicant's responsibility to provide an estimate of SSM emissions or to provide justification for not doing so. In this Section, provide emissions calculations for Startup, Shutdown, and Routine Maintenance (SSM) emissions listed in the Section 2 SSM and/or Section 22 GHG Tables and the rational for why the others are reported as zero (or left blank in the SSM/GHG Tables). Refer to "Guidance for Submittal of Startup, Shutdown, Maintenance Emissions in Permit Applications (http://www.nmenv.state.nm.us/aqb/permit/app_form.html) for more detailed instructions on calculating SSM emissions. If SSM emissions are greater than those reported in the Section 2, Requested Allowables Table, modeling may be required to ensure compliance with the standards whether the application is NSR or Title V. Refer to the Modeling Section of this application for more guidance on modeling requirements.

Glycol Dehydrator Calculations: The information provided to the AQB shall include the manufacturer's maximum design recirculation rate for the glycol pump. If GRI-Glycalc is used, the full input summary report shall be included as well as a copy of the gas analysis that was used.

Significant Figures:

A. All emissions standards are deemed to have at least two significant figures, but not more than three significant figures.

B. At least 5 significant figures shall be retained in all intermediate calculations.

C. In calculating emissions to determine compliance with an emission standard, the following rounding off procedures shall be used:

(1) If the first digit to be discarded is less than the number 5, the last digit retained shall not be changed;

(2) If the first digit discarded is greater than the number 5, or if it is the number 5 followed by at least one digit other than the number zero, the last figure retained shall be increased by one unit; **and**

(3) If the first digit discarded is exactly the number 5, followed only by zeros, the last digit retained shall be rounded upward if it is an odd number, but no adjustment shall be made if it is an even number.

(4) The final result of the calculation shall be expressed in the units of the standard.

Emission Points 301 -304 Coal Boiler/Boiler Stacks Units 1 - 4

SO_2 Annual

Annual emission limits for SO_2 at SJGS will be based on the proposed 0.15 lb/MMBtu heat input 30-day rolling average SO_2 emission limit. Calculation of the annual SO_2 emission limit includes input of the proposed 0.15 lb/MMBtu heat input 30-day rolling average SO_2 emission limitation, SJGS maximum hours of operations for each unit of 8760 hours per year, and the following maximum heat input values:

Unit 1: 3,707 mmBtu/hr
Unit 2: 3,688 mmBtu/hr
Unit 3: 5,758 mmBtu/hr
Unit 4: 5,649 mmBtu/hr.

E301: Unit 1 Boiler Unit SO_2 Annual Limits

Proposed 0.15 lb/MMBtu heat input 30-day rolling average SO_2 emission limit, maximum unit heat input, and 8760 hour per year operation:

0.15 lbs/mmBtu * 3,707 mmBtu/hr * 8760 hr/yr / 2000 lbs/ton = 2435 tpy

E302: Unit 2 Boiler Unit SO_2 Annual Limits

Proposed 0.15 lb/MMBtu heat input 30-day rolling average SO_2 emission limit, maximum unit heat input, and 8760 hour per year operation:

0.15 lbs/mmBtu * 3,688 mmBtu/hr * 8760 hr/yr / 2000 lbs/ton = 2423 tpy

E303: Unit 3 Boiler Unit SO_2 Annual Limits

Proposed 0.15 lb/MMBtu heat input 30-day rolling average SO_2 emission limit, maximum unit heat input, and 8760 hour per year operation:

0.15 lbs/mmBtu * 5,758 mmBtu/hr * 8760 hr/yr / 2000 lbs/ton = 3783 tpy

E304: Unit 4 Boiler Unit SO_2 Annual Limits

Proposed 0.15 lb/MMBtu heat input 30-day rolling average SO_2 emission limit, maximum unit heat input, and 8760 hour per year operation:

0.15 lbs/mmBtu * 5,649 mmBtu/hr * 8760 hr/yr / 2000 lbs/ton = 3711 tpy

Section 7

Information Used To Determine Emissions

Information Used to Determine Emissions shall include the following:

- ☐ If manufacturer data are used, include specifications for emissions units and control equipment, including control efficiencies specifications and sufficient engineering data for verification of control equipment operation, including design drawings, test reports, and design parameters that affect normal operation.
- ☐ If test data are used, include a copy of the complete test report. If the test data are for an emissions unit other than the one being permitted, the emission units must be identical. Test data may not be used if any difference in operating conditions of the unit being permitted and the unit represented in the test report significantly effect emission rates.
- ☐ If the most current copy of AP-42 is used, reference the section and date located at the bottom of the page. Include a copy of the page containing the emissions factors, and clearly mark the factors used in the calculations.
- ☐ If an older version of AP-42 is used, include a complete copy of the section.
- ☐ If an EPA document or other material is referenced, include a complete copy.
- ☐ Fuel specifications sheet.
- ☐ If computer models are used to estimate emissions, include an input summary (if available) and a detailed report, and a disk containing the input file(s) used to run the model. For tank-flashing emissions, include a discussion of the method used to estimate tank-flashing emissions, relative thresholds (i.e., permit or major source (NSPS, PSD or Title V)), accuracy of the model, the input and output from simulation models and software, all calculations, documentation of any assumptions used, descriptions of sampling methods and conditions, copies of any lab sample analysis.

This section was not completed because this permit application is for a 20.2.72 NMAC Technical Revision with no change in facility operations, facility equipment, or increase in facility emissions.

Section 8

Map(s)

A map such as a 7.5 minute topographic quadrangle showing the exact location of the source. The map shall also include the following:

The UTM or Longitudinal coordinate system on both axes	An indicator showing which direction is north
A minimum radius around the plant of 0.8km (0.5 miles)	Access and haul roads
Topographic features of the area	Facility property boundaries
The name of the map	The area which will be restricted to public access
A graphical scale	

This section was not completed because this permit application is for a 20.2.72 NMAC Technical Revision with no change in facility operations, facility equipment, or increase in facility emissions.

Section 9

Proof of Public Notice

(for NSR applications submitting under 20.2.72 or 20.2.74 NMAC)
(This proof is required by: 20.2.72.203.A.14 NMAC "Documentary Proof of applicant's public notice")

✓ **I have read the AQB "Guidelines for Public Notification for Air Quality Permit Applications"**
This document provides detailed instructions about public notice requirements for various permitting actions. It also provides public notice examples and certification forms. Material mistakes in the public notice will require a re-notice before issuance of the permit.

Unless otherwise allowed elsewhere in this document, the following items document proof of the applicant's Public Notification. Please include this page in your proof of public notice submittal with checkmarks indicating which documents are being submitted with the application.

New Permit and **Significant Permit Revision** public notices must include all items in this list.

Technical Revision public notices require only items 1, 5, 9, and 10.

Per the Guidelines for Public Notification document mentioned above, include:

1. ✓ A copy of the certified letter receipts with post marks (20.2.72.203.B NMAC)
2. ☐ A list of the places where the public notice has been posted in at least four publicly accessible and conspicuous places, including the proposed or existing facility entrance. (e.g: post office, library, grocery, etc.)
3. ☐ A copy of the property tax record (20.2.72.203.B NMAC).
4. ☐ A sample of the letters sent to the owners of record.
5. ✓ A sample of the letters sent to counties, municipalities, and Indian tribes.
6. ☐ A sample of the public notice posted and a verification of the local postings.
7. ☐ A table of the noticed citizens, counties, municipalities and tribes and to whom the notices were sent in each group.
8. ☐ A copy of the public service announcement (PSA) sent to a local radio station and documentary proof of submittal.
9. ✓ A copy of the classified or legal ad including the page header (date and newspaper title) or its affidavit of publication stating the ad date, and a copy of the ad. When appropriate, this ad shall be printed in both English and Spanish.
10. ✓ A copy of the display ad including the page header (date and newspaper title) or its affidavit of publication stating the ad date, and a copy of the ad. When appropriate, this ad shall be printed in both English and Spanish.
11. ☐ A map with a graphic scale showing the facility boundary and the surrounding area in which owners of record were notified by mail. This is necessary for verification that the correct facility boundary was used in determining distance for notifying land owners of record.

Final public notice documents, newspaper affidavits and letters sent government entities, will be submitted under a different cover. Attached is a list containing the name and addresses to all government entities within 10 miles for SJGS and a copy of the public notice that was submitted to the newspaper of general circulation in the area of SJGS.

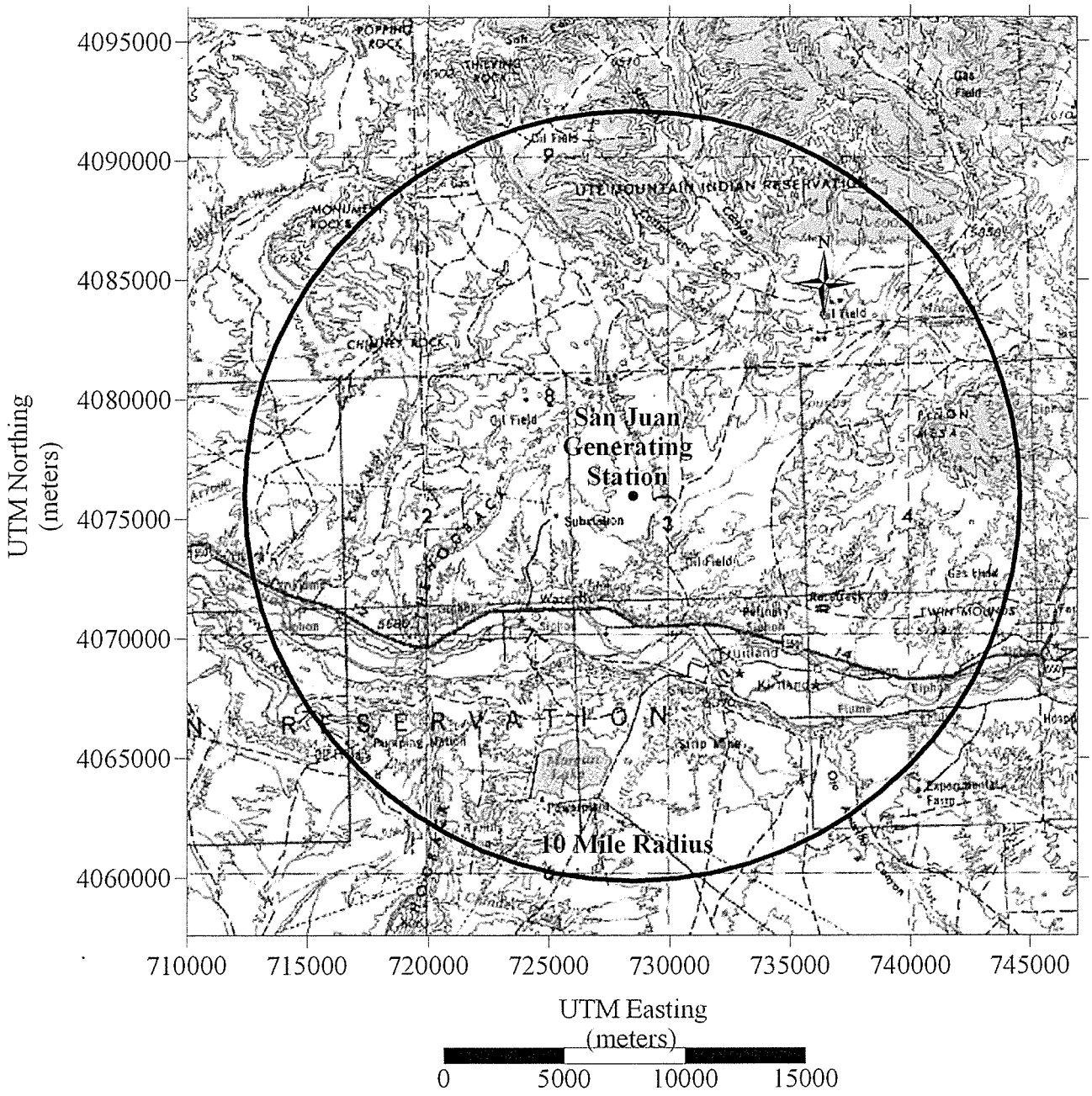

Figure 9-1: Topo Map Showing All Counties, Municipalities, and Indian tribes within a Ten Mile Radius

List of Counties, Municipalities, and Indian tribes within a Ten Mile Radius

San Juan County Clerk's Office
100 South Oliver Drive
Aztec, NM 87410

Navajo Nation
P.O. Box 9000
Window Rock, AZ 85615

Ute Mountain Ute Tribe
P.O. Box 248
Towaoc, CO 81334

NOTICE OF AIR QUALITY PERMIT APPLICATION

Public Service Company of New Mexico (PNM) announces its intent to apply to the New Mexico Environment Department for technical revision to air quality construction permit #0063-M6R1 for the San Juan Generating Station. The expected date of application submittal to the Air Quality Bureau is April 15, 2011. This notice is a requirement according to New Mexico air quality regulations.

The exact location for the proposed facility known as, San Juan Generating Station, is latitude 36°, 48', 7.4" N and longitude 108°, 26', 19.5" W, NAD83. The approximate location of the San Juan Generating Station is three miles north-northeast of Waterflow, NM in San Juan County.

The proposed modification consists of the addition of a 30 day rolling average SO_2 emission limit of 0.15 pounds per million BTUs (lbs/mmBtu) permit condition and a reduction in SO_2 annual emission limits for combustion boiler units 1-4 (Emission Units E301, E302, E303, E304). No other changes to the facility are proposed, including any change to existing emission limits or facility operational parameters or procedures.

The current NSR Permit #0063M6R1 and proposed maximum annual regulated air contaminants are listed in the following Table: (These emission estimates could change slightly during the course of the Department's review of the application.)

Pollutant:	Current NSR Tons per Year	Proposed Tons per Year	Difference Tons per Year
Total Suspended Particulates (TSP)	1,816 tpy	1,816 tpy	0 tpy
PM_{10}	1,549 tpy	1,549 tpy	0 tpy
Sulfur Dioxide (SO_2)	16,043 tpy	12,373 tpy	-3,670 tpy
Nitrogen Oxides (NO_x)	24,710 tpy	24,710 tpy	0 tpy
Carbon Monoxide (CO)	39,427 tpy	39,427 tpy	0 tpy
Volatile Organic Compounds (VOC)	249 tpy	249 tpy	0 tpy
Total sum of all Hazardous Air Pollutants (HAPs)	64 tpy	64 tpy	0 tpy

The maximum and standard operating schedule of the plant is 24 hours per day, 7 days a week, and a maximum of 52 weeks per year for annual operating hours of 8760 hours per year.

Owners and operators of the facility include:

Public Service Company of New Mexico (PNM)
Alvarado Square
Albuquerque, New Mexico 87158

If you have any comments about the construction or operation of the above facility, and you want your comments to be made as part of the permit review process, you must submit your comments in writing to the address below:

Permit Programs Manager
New Mexico Environment Department
Air Quality Bureau
1301 Siler Road, Building B
Santa Fe, New Mexico 87507-3113
(505) 476-4300

Other comments and questions may be submitted verbally.

Please refer to the company name and site name, as used in this notice or send a copy of this notice along with your comments, since the Department may not have received the permit application at the time of this notice. Please include a legible mailing address with your comments. Once the Department has performed a preliminary review of the application and its air quality impacts, the Departments notice will be published in the legal section of a newspaper circulated near the facility location.

CERTIFIED MAIL XXXX XXXX XXXX XXXX
RETURN RECEIPT REQUESTED

Dear *County or Tribe Official*
According to New Mexico air quality regulations, Public Service Company of New Mexico (PNM) must announce its intent to apply to the New Mexico Environment Department for a technical revision to air quality construction permit #0063-M6R1 for the San Juan Generating Station. The expected date of application submittal to the Air Quality Bureau is April 15, 2011.

The exact location for the proposed facility known as, San Juan Generating Station, is latitude 36°, 48', 7.4" N and longitude 108°, 26', 19.5" W, NAD83. The approximate location of the San Juan Generating Station is three miles north-northeast of Waterflow, NM in San Juan County.

The proposed modification consists of the addition of a 30 day rolling average SO_2 emission limit of 0.15 pounds per million BTUs (lbs/mmBtu) permit condition and a reduction in SO_2 annual emission limits for combustion boiler units 1-4 (Emission Units E301, E302, E303, E304). No other changes to the facility are proposed, including any change to existing emission limits or facility operational parameters or procedures.

The current NSR Permit #0063M6R1 and proposed maximum annual regulated air contaminants are listed in the following Table: (These emission estimates could change slightly during the course of the Department's review of the application.)

Pollutant:	Current NSR Tons per Year	Proposed Tons per Year	Difference Tons per Year
Total Suspended Particulates (TSP)	1,816 tpy	1,816 tpy	0 tpy
PM_{10}	1,549 tpy	1,549 tpy	0 tpy
Sulfur Dioxide (SO_2)	16,043 tpy	12,373 tpy	-3,670 tpy
Nitrogen Oxides (NO_x)	24,710 tpy	24,710 tpy	0 tpy
Carbon Monoxide (CO)	39,427 tpy	39,427 tpy	0 tpy
Volatile Organic Compounds (VOC)	249 tpy	249 tpy	0 tpy
Total sum of all Hazardous Air Pollutants (HAPs)	64 tpy	64 tpy	0 tpy

The maximum and standard operating schedule of the plant is 24 hours per day, 7 days a week, and a maximum of 52 weeks per year for annual operating hours of 8760 hours per year.

Owners and operators of the facility include:

Public Service Company of New Mexico (PNM)
Alvarado Square
Albuquerque, New Mexico 87158

If you have any comments about the construction or operation of the above facility, and you want your comments to be made as part of the permit review process, you must submit your comments in writing to the address below:

Permit Programs Manager
New Mexico Environment Department
Air Quality Bureau
1301 Siler Road, Building B
Santa Fe, New Mexico 87507-3113
(505) 476-4300

Other comments and questions may be submitted verbally.

Please refer to the company name and site name, as used in this notice or send a copy of this notice along with your comments, since the Department may not have received the permit application at the time of this notice. Please include a legible mailing address with your comments. Once the Department has performed a preliminary review of the application and its air quality impacts, the Departments notice will be published in the legal section of a newspaper circulated near the facility location.

Sincerely,
[permit applicant]
[permit applicant address]

Section 10

Written Description of the Routine Operations of the Facility

A written description of the routine operations of the facility. Include a description of how each piece of equipment will be operated, how controls will be used, and the fate of both the products and waste generated. For modifications and/or revisions, explain how the changes will affect the existing process. In a separate paragraph describe the major process bottlenecks that limit production. The purpose of this description is to provide sufficient information about plant operations for the permit writer to determine appropriate emission sources.

This section was not completed because this permit application is for a 20.2.72 NMAC Technical Revision with no change in facility operations, facility equipment, or increase in facility emissions.

Section 11
Source Determination

Source submitting under 20.2.70, 20.2.72, and 20.2.74 NMAC

This section was not completed because this permit application is for a 20.2.72 NMAC Technical Revision with no change in facility operations, facility equipment, or increase in facility emissions.

Section 12

Section 12.A
PSD Applicability Determination for All Sources

(Submitting under 20.2.72, 20.2.74 NMAC)

A PSD applicability determination for all sources. For sources applying for a significant permit revision, apply the applicable requirements of 20.2.74 NMAC to determine whether this facility is a major or minor PSD source, and whether this modification is a major or a minor PSD modification. It may be helpful to refer to the procedures for Determining the Net Emissions Change at a Source as specified by Table A-5 (Page A.45) of the EPA New Source Review Workshop Manual to determine if the revision is subject to PSD review.

A. This facility is:

- ☐ **a minor source before and after this modification (if so, delete C and D below).**
- ☐ **a major source before this modification. This modification will make this a PSD minor source.**
- ☐ **an existing PSD Major Source that has never had a major modification requiring a BACT analysis.**
- ☐ **an existing PSD Major Source that has had a major modification requiring a BACT analysis**
- ☐ **a new PSD Major Source after this modification.**

B. **This facility [is or is not] one of the listed 20.2.74.501 Table I – PSD Source Categories. The "project" emissions** for this modification are **[significant or not significant]. [Discuss why.] The "project" emissions listed below [do or do not] only result from changes described in this permit application, thus no emissions from other [revisions or modifications, past or future] to this facility. Also, specifically discuss whether this project results in "de-bottlenecking", resulting in higher emissions. The project emissions (before netting) for this project are as follows:**

a. **NOx: XX.X TPY**
b. **CO: XX.X TPY**
c. **VOC: XX.X TPY**
d. **SOx: XX.X TPY**
e. **PM: XX.X TPY**
f. **GHG: XX.X TPY**

C. **Netting [is required, and analysis is attached to this document.] OR [is not required (project is not significant)] OR [Applicant is submitting a PSD Major Modification and chooses not to net.]**

D. **BACT** is **[not required for this modification, as this application is a minor modification.] OR [required, as this application is a major modification. List pollutants subject to BACT review and provide a full top down BACT determination.]**

E. If this is an existing PSD major source, or any facility with emissions greater than 250 TPY (or 100 TPY for 20.2.74.501 Table 1 – PSD Source Categories), determine whether any permit modifications in the last two years were related, or could be considered a single project with this action, and provide an explanation for your determination whether a PSD modification is triggered.

Section 12.B
Special Requirements for a PSD Application

(Submitting under 20.2.74 NMAC)

Prior *to Submitting a PSD application*, the permittee shall:

- ☐ Submit the BACT analysis for review prior to submittal of the application. No application will be ruled complete until the final determination regarding BACT is made, as this determination can ultimately affect information to be provided in the application. A pre-application meeting is recommended to discuss the requirements of the BACT analysis.
- ☐ Submit a modeling protocol prior to submitting the permit application. **[Except for GHG]**
- ☐ Submit the monitoring exemption analysis protocol prior to submitting the application. **[Except for GHG]**

For PSD applications, the permittee shall also include the following:

- ☐ Documentation containing an analysis on the impact on visibility. **[Except for GHG]**
- ☐ Documentation containing an analysis on the impact on soil. **[Except for GHG]**
- ☐ Documentation containing an analysis on the impact on vegetation, including state and federal threatened and endangered species. **[Except for GHG]**
- ☐ Documentation containing an analysis on the impact on water consumption and quality. **[Except for GHG]**
- ☐ Documentation that the federal land manager of a Class I area within 100 km of the site has been notified and provided a copy of the application, including the BACT and modeling results. The name of any Class I Federal area located within one hundred (100) kilometers of the facility.

This section was not completed because this permit application is for a 20.2.72 NMAC Technical Revision with no change in facility operations, facility equipment, or increase in facility emissions.

Section 13

Discussion Demonstrating Compliance With Each Applicable State & Federal Regulation

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Provide a discussion demonstrating compliance with applicable state & federal regulation. If there is a state or federal regulation (other than those listed here) for your facility's source category that does not apply to your facility, but seems on the surface that it should apply, add the regulation to the appropriate table below and provide the analysis. Examples of regulatory requirements that may or may not apply to your facility include 40 CFR 60 Subpart OOO (crushers), 40 CFR 63 Subpart HHH (HAPs), or 20.2.74 NMAC (PSD major sources). We don't want a discussion of every non-applicable regulation, but if there is questionable applicability, explain why it does not apply. All input cells should be filled in, even if the response is 'No' or 'N/A'.

In the "Justification" column, identify the criteria that are critical to the applicability determination, numbering each. For each unit listed in the "Applies to Unit No(s)" column, after each listed unit, include the number(s) of the criteria that made the regulation applicable. For example, TK-1 & TK-2 would be listed as: TK-1 (1, 3, 4), TK-2 (1, 2, 4). Doing so will provide the applicability criteria for each unit, while also minimizing the length of these tables.

As this table will become part of the SOB, please do not change the any formatting in the table, especially the width of the table.

If this application includes any proposed exemptions from otherwise applicable requirements, provide a narrative explanation of these proposed exemptions. These exemptions are from specific applicable requirements, which are spelled out in the requirements themselves, not exemptions from 20.2.70 NMAC or 20.2.72 NMAC.

This section was not completed because this permit application is for a 20.2.72 NMAC Technical Revision with no change in facility operations, facility equipment, or increase in facility emissions.

Section 14

Operational Plan to Mitigate Emissions

(submitting under 20.2.70, 20.2.72, 20.2.74 NMAC)

☐ **Title V Sources** (20.2.70 NMAC)**:** By checking this box and certifying this application the permittee certifies that it has developed an **Operational Plan to Mitigate Emissions During Startups, Shutdowns, and Emergencies** defining the measures to be taken to mitigate source emissions during startups, shutdowns, and emergencies as required by 20.2.70.300.D.5(f) and (g) NMAC. This plan shall be kept on site to be made available to the Department upon request. This plan should not be submitted with this application.

☐ **NSR** (20.2.72 NMAC)**, PSD** (20.2.74 NMAC) **& Nonattainment** (20.2.79 NMAC) **Sources:** By checking this box and certifying this application the permittee certifies that it has developed an **Operational Plan to Mitigate Source Emissions During Malfunction, Startup, or Shutdown** defining the measures to be taken to mitigate source emissions during malfunction, startup, or shutdown as required by 20.2.72.203.A.5 NMAC. This plan shall be kept on site to be made available to the Department upon request. This plan should not be submitted with this application.

☐ **Title V** (20.2.70 NMAC)**, NSR** (20.2.72 NMAC)**, PSD** (20.2.74 NMAC) **& Nonattainment** (20.2.79 NMAC) **Sources:** By checking this box and certifying this application the permittee certifies that it has established and implemented a Plan to Minimize Emissions During Routine or Predictable Startup, Shutdown, and Scheduled Maintenance through work practice standards and good air pollution control practices as required by 20.2.7.14.A and B NMAC. This plan shall be kept on site or at the nearest field office to be made available to the Department upon request. This plan should not be submitted with this application.

This section was not completed because this permit application is for a 20.2.72 NMAC Technical Revision with no change in facility operations, facility equipment, or increase in facility emissions.

Section 15

Alternative Operating Scenarios

(submitting under 20.2.70, 20.2.72, 20.2.74 NMAC)

Alternative Operating Scenarios: Provide all information required by the department to define alternative operating scenarios. This includes process, material and product changes; facility emissions information; air pollution control equipment requirements; any applicable requirements; monitoring, recordkeeping, and reporting requirements; and compliance certification requirements. Please ensure applicable Tables in this application are clearly marked to show alternative operating scenario.

This section was not completed because this permit application is for a 20.2.72 NMAC Technical Revision with no change in facility operations, facility equipment, or increase in facility emissions.

Section 16

Air Dispersion Modeling

NSR (20.2.72 NMAC) and PSD (20.2.74 NMAC) Modeling: Provide an air quality **dispersion modeling** demonstration (if applicable) as outlined in the Air Quality Bureau's Dispersion Modeling Guidelines. If air dispersion modeling has been waived for this permit application, attach the AQB Modeling Section modeling waiver documentation.

SSM Modeling: Applicants must conduct dispersion modeling for the total short term emissions using realistic worst case scenarios following guidance from the Air Quality Bureau's dispersion modeling section. Refer to "Guidance for Submittal of Startup, Shutdown, Maintenance Emissions in Permit Applications (http://www.nmenv.state.nm.us/aqb/permit/app_form.html) for more detailed instructions on SSM emissions modeling requirements.

Title V (20.2.70 NMAC) Modeling: Title V applications must specify the NSR Permit number for which air quality dispersion modeling was last submitted. Additionally, Title V facilities reporting new SSM emissions require modeling or a modeling waiver to demonstrate compliance with standards.

This section was not completed because this permit application is for a 20.2.72 NMAC Technical Revision with no change in facility operations, facility equipment, or increase in facility emissions.

Section 17

Compliance Test History

(submitting under 20.2.70, 20.2.72, 20.2.74 NMAC)

To show compliance with existing NSR permits conditions, you must submit a compliance test history. The table below provides an example.

This section was not completed because this permit application is for a 20.2.72 NMAC Technical Revision with no change in facility operations, facility equipment, or increase in facility emissions.

Section 20

Other Relevant Information

Other relevant information. Use this attachment to clarify any part in the application that you think needs explaining. Reference the section, table, column, and/or field. Include any additional text, tables, calculations or clarifying information.

Additionally, the applicant may propose specific permit language for AQB consideration. In the case of a revision to an existing permit, the applicant should provide the old language and the new language in track changes format to highlight the proposed changes. If proposing language for a new facility or language for a new unit, submit the proposed operating condition(s), along with the associated monitoring, recordkeeping, and reporting conditions. In either case, please limit the proposed language to the affected portion of the permit.

This section was not completed because this permit application is for a 20.2.72 NMAC Technical Revision with no change in facility operations, facility equipment, or increase in facility emissions.

Section 22

Green House Gas Applicability

(submitting under 20.2.70, 20.2.72, 20.2.73, 20.2.74 NMAC)

This section was not completed because this permit application is for a 20.2.72 NMAC Technical Revision with no change in facility operations, facility equipment, or increase in facility emissions.

Section 23: Certification

Company Name: Public Service Company of New Mexico

I, Gregory Smith, hereby certify that the information and data submitted in this application are true and as accurate as possible, to the best of my knowledge and professional expertise and experience.

Signed this 18th day of April, 2011, upon my oath or affirmation, before a notary of the State of New Mexico.

Ernie Rodarte for Gregory Smith
*Signature

4-18-2011
Date

Ernie Rodarte
Printed Name

Director of Compliance
Title

Scribed and sworn before me on this 18th day of April, 2011.

My authorization as a notary of the State of New Mexico expires on the 25th day of March, 2012.

Robin K. DeLapp
Notary's Signature

4-18-2011
Date

Robin K. DeLapp
Notary's Printed Name

OFFICIAL SEAL
Robin K. DeLapp
NOTARY PUBLIC
STATE OF NEW MEXICO
My Commission Expires: 3/25/12

*For Title V applications, the signature must be of the Responsible Official as defined in 20.2.70.7.AD NMAC.