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March 30, 2016

Ms. Kirby Olson
New Mexico Environment Department
Air Quality Bureau
525 Camino de los Marquez, Suite 1
Santa Fe, New Mexico, 87505-1816

RE: Air Permit Amendment Application
Permit No. PSD 3449-M3
Hobbs Generating Station
Hobbs, New Mexico

Dear Ms. Olson

On behalf of Lea Power Partners, LLC (LPP), CAMS eSPARC is submitting the attached Air Permit Amendment Application for your consideration. A waiver from Air Dispersion Modeling requirements was received from the New Mexico Department of Environment Air Quality Bureau on April 22, 2016.

This application proposes a significant revision to NSR Permit PSD 3449-M3 for Lea Power Partners, LLC (LPP) Hobbs Generating Station (Hobbs).

Hobbs is a natural gas fueled, nominal 600 MW net output power plant with two advanced firing temperature, Mitsubishi 501F combustion turbine generators (CTGs), each provided with its own heat recovery steam generator (HRSG) including duct burners, a single condensing, reheat steam turbine generator (STG), and an air cooled condenser serving the STG. The plant generates electricity for sale to Southwestern Public Service Company, its successors or assigns. The facility is located approximately 9 miles west of Hobbs, New Mexico in Lea County.

In 2014, Hobbs submitted a significant revision application to allow the upgrade of both CTGs in order to improve the station performance. Row 1 Blade Ring, Row 1 Compressor Blades, Rows 1, 2 and 3 Turbine Blades, Rows 1, 2 and 4 and Vanes and Rows 1 and 2 Ring Segments were replaced with new parts with superior cooling technology. This change resulted in the need for less cooling air with a corresponding increase in fuel consumption, exhaust flow rate, temperature, and electricity production.

Although concentrations of NO_x, CO and VOC emitted from the turbine exhaust remained constant, there was an increase in the actual mass emission rates of these pollutants due to the increased exhaust flow rate compared to historical past actual emission rates. Increases in particulate matter (PM₁₀ and PM_{2.5}) and SO₂, also occurred due to increased fuel consumption. Startup, Shutdown and Maintenance (SSM) emissions did not change as a result of this project. However, during the permit application review process, NMED noted that although the permit included a concentration limit for CO during startups, it did not include a mass emission rate limit.

A maximum hourly mass emission rate limit was established during the 2014 permit revision based on information supplied by the catalyst vendor related to expected post-catalyst mass emissions during different types of startups. Based on the vendor information, a mass permit limit of 441 lb/hr was requested. In late 2015, Hobbs experienced a number of exceedances of the allowable CO hourly mass emission rate for startups. The CO BACT level of 3,000 ppmvd @ 15% O₂ was not exceeded. Further review of plant historical data showed that the representation for the mass emission limit in the turbine upgrade permit application in 2014 is not achievable during actual operations.

The mass emission representation provided in the 2014 permitting action assumed that a catalyst temperature of approximately 400°F would be achieved during the early phases of startup. However, the actual operating data shows that startups are frequently initiated with the catalyst temperature below this level. It is evident that the equipment is not capable of achieving the CO mass emission limit as established by PSD-3449-M2. As represented during the 2014 permitting action, SSM emissions did not change as a result of the turbine upgrade project. A revision to the PSD permit is therefore necessary to provide the site with an achievable startup mass emission limit for CO. Since the existing 3,000 ppmv CO dry @ 15% O₂ (ppmvdc) BACT limit will continue to be met, no additional BACT analysis is necessary for this permitting action.

The only pollutant affected by this permitting action is CO during SSM operations. A new hourly SSM mass emission rate limit of 2,060 lb/hr from each unit (HOBB-1 and HOBB-2) is proposed. Only one unit will be in start-up mode at any given time. This limit is based on actual plant operating data, with a safety factor of 25 percent applied. No increase in the achievable BACT limit of 3,000 ppmvdc or in the annual mass emission rate is proposed since these remain unchanged per startup. Additionally, changes to the permit language are necessary to provide clarity regarding three issues that were discovered during the development of this permit application:

- 1) The site DAHS was not calculating the mass emission rate for partial hours as a clock hour (60 minute) average of actual mass emissions emitted over a one-hour period. As a result, hourly emission rates were being recorded in excess of the amount of mass emissions that could be emitted in a 60-minute averaging period. Additional language is proposed to clarify that for the purposes of compliance with the hourly emission rates specified in this permit, one-hour average emission rates (i.e., Block Average) will be calculated as the actual mass of pollutant emitted in a given clock hour.
- 2) It was discovered that the practice specified Permit Condition A401C(3)(iii) of using Part 75 SO₂ data substitution methods for non-valid hours of CO emissions was causing SSM emissions to be substituted into normal operating hour periods. To resolve this issue, Hobbs proposes that the Part 75 NO_x data substitution methods be applied instead and that the hourly emission rate limits specified in Table 106A not be applicable to substituted data that is not from the same load range or operational bin as the missing data.
- 3) A revision to SSM VOC emission rate limit description is necessary because it is not possible to demonstrate compliance with this limit. The limit in the current permit (PSD 3449-M3) assumes that some level of VOC control will be achieved during the startup sequence and that level can be monitored.

Please contact me at (281) 333-3339 ext 201 or via email at mjohnson@camsesparc.com or Michael Barnett at (575) 397-6731 or via email at mbarnett@camsops.com if you have any questions or need additional information.

Sincerely,

A handwritten signature in blue ink, appearing to read "Mona Caesar Johnson".

Mona Caesar Johnson, PE
CAMS eSPARC, LLC

cc:

Roger Schnabel
Hobbs Generating Station
98 N. Twombly Lane
Hobbs, NM 88242

Matt Lindsey
Consolidated Asset Manager Services
919 Milam Street, Suite 2300
Houston, TX 77002

<p>Mail Application To:</p> <p>New Mexico Environment Department Air Quality Bureau Permits Section 525 Camino de los Marquez, Suite 1 Santa Fe, New Mexico, 87505</p> <p>Phone: (505) 476-4300 Fax: (505) 476-4375 www.env.nm.gov/aqb</p>		<p>For Department use only:</p> <p>AIRS No.:</p>
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Universal Air Quality Permit Application

Use this application for NOI, NSR, or Title V sources.

Use this application for: the initial application, modifications, technical revisions, and renewals. For technical revisions, complete Sections, 1-A, 1-B, 2-E, 3, 9 and any other sections that are relevant to the requested action; coordination with the Air Quality Bureau permit staff prior to submittal is encouraged to clarify submittal requirements and to determine if more or less than these sections of the application are needed. Use this application for streamline permits as well. For NOI applications, submit the entire UA1, UA2, and UA3 applications on a single CD (no copies are needed). For NOIs, hard copies of UA1, Tables 2A, 2D & 2F, Section 3 and the signed Certification Page are required.

This application is being submitted as (check all that apply): Request for a No Permit Required Determination (no fee) **Updating** an application currently under NMED review. Include this page and all pages that are being updated (no fee required).
 Construction Status: Not Constructed **Existing Permitted (or NOI) Facility** Existing Non-permitted (or NOI) Facility
 Minor Source: a NOI 20.2.73 NMAC 20.2.72 NMAC application/revision 20.2.72.300 NMAC Streamline application
 Title V Source: Title V (new) Title V renewal TV minor mod. TV significant mod. TV Acid Rain: New Renewal
 PSD Major Source: PSD major source (new) **minor modification to a PSD source** a PSD major modification

Acknowledgements: I acknowledge that a pre-application meeting is available to me upon request NPR (no fee)
 \$500 NSR Permit Filing Fee enclosed **OR** The full permit fee associated with 10 fee points (required w/ streamline applications).
 Check No.: **010437** in the amount of **\$500** (Fee not required for Title V) This facility meets the applicable requirements to register as a Small Business and a check for 50% of the normal fee is enclosed (only applicable **provided** that NMED has a Small Business Certification Form from your company on file found at: http://www.env.nm.gov/aqb/permit/app_form.html).

Citation: Please provide the **low level citation** under which this application is being submitted: **20.2.72.200.A(2) NMAC and 20.2.74.200.A NMAC** (i.e. an example of an application for a new minor source would be 20.2.72.200.A NMAC, one example of a low level cite for a Technical Revision could be: 20.2.72.219.B.1.b NMAC, or a Title V acid rain cite would be: 20.2.70.200.C NMAC)

Synthetic Minor Source Information: A source is synthetic minor if its uncontrolled emissions are above major source applicability thresholds, but the facility is minor because it has federally enforceable requirements (federal requirements or permit conditions) that limit controlled emissions below major source thresholds. Facilities can be synthetic minor for either Title V (20.2.70 NMAC) or PSD (20.2.74 NMAC) or both. The Department tracks synthetic minor sources that are within 20% of either TV or PSD major source thresholds, referring to these as Synthetic Minor 80 Sources (abbreviated SM80). Please check all that apply:
 Prior to this permitting action this source is a TV major source, a TV synthetic minor source, a TV SM80 source.
 Prior to this permitting action this source is a PSD major source, a PSD synthetic minor source, a PSD SM80 source.
 This permitting action results in a TV synthetic minor source and/or PSD synthetic minor source.

Section 1 – Facility Information

<p>Section 1-A: Company Information</p>		AI # (if known): 25726	Updating Permit/NOI #: PSD 3449-M3
1	Facility Name: Hobbs Generating Station	Plant primary SIC Code (4 digits): 4911	
a	Facility Street Address (If no facility street address, provide directions from a prominent landmark): 98 N. Twombly Lane, Hobbs, NM 88242		
2	Plant Operator Company Name: CAMS (New Mexico), LLC	Phone/Fax: (575) 397-6706 / (575) 397-6793	
a	Plant Operator Address: 98 N. Twombly Lane, Hobbs, NM 88242		
b	Plant Operator's New Mexico Corporate ID or Tax ID: 260471741		

3	Plant Owner(s) name(s): Lea Power Partners, LLC, c/o Mr. David Baugh	Phone/Fax: (713) 358-9733 / (713) 358-9730
a	Plant Owner(s) Mailing Address(s): 98 N. Twombly Lane, Hobbs, NM 88242	
4	Bill To (Company): Mr. Roger Schnabel	Phone/Fax: (575) 397-6706 / (575) 397-6793
a	Mailing Address: 98 N. Twombly Lane, Hobbs, NM 88242	E-mail: rschnabel@camstex.com
5	<input type="checkbox"/> Preparer: <input checked="" type="checkbox"/> Consultant: CAMS eSPARC, Mona Caesar Johnson, P.E.	Phone/Fax: (281) 333-3339/ (281) 333-3386
a	Mailing Address: 1110 Nasa Parkway, Suite 212, Houston, TX 77058	E-mail: mjohnson@camsesparc.com
6	Plant Operator Contact: Mr. Roger Schnabel	Phone/Fax: (575) 397-6706 / (575) 397-6793
a	Address: 98 N. Twombly Lane, Hobbs, NM 88242	E-mail: rschnabel@camstex.com
7	Air Permit Contact: Mr. Roger Schnabel	Title: Plant Manager
a	E-mail: rschnabel@camstex.com	Phone/Fax: (575) 397-6706 / (575) 397-6793
b	Mailing Address: 98 N. Twombly Lane, Hobbs, NM 88242	

Section 1-B: Current Facility Status

1.a	Has this facility already been constructed? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	1.b If yes to question 1.a, is it currently operating in New Mexico? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
2	If yes to question 1.a, was the existing facility subject to a Notice of Intent (NOI) (20.2.73 NMAC) before submittal of this application? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If yes to question 1.a, was the existing facility subject to a construction permit (20.2.72 NMAC) before submittal of this application? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
3	Is the facility currently shut down? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If yes, give month and year of shut down (MM/YY):
4	Was this facility constructed before 8/31/1972 and continuously operated since 1972? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
5	If Yes to question 3, has this facility been modified (see 20.2.72.7.P NMAC) or the capacity increased since 8/31/1972? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
6	Does this facility have a Title V operating permit (20.2.70 NMAC)? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If yes, the permit No. is: P-244-M4
7	Has this facility been issued a No Permit Required (NPR)? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If yes, the NPR No. is:
8	Has this facility been issued a Notice of Intent (NOI)? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If yes, the NOI No. is:
9	Does this facility have a construction permit (20.2.72 NMAC)? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If yes, the permit No. is: PSD 3449-M3
10	Is this facility registered under a General permit (GCP-1, GCP-2, etc.)? <input type="checkbox"/> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If yes, the register No. is:

Section 1-C: Facility Input Capacity & Production Rate

1	What is the facility's maximum input capacity, specify units (reference here and list capacities in Section 20, if more room is required)			
a	Current	Hourly: 3,830 MMBtu/hr (LHV)	Daily: 91,920 MMBtu/Day (LHV)	Annually: 29,535,551MMBtu/yr (LHV)
b	Proposed	Hourly: 4,054 MMBtu/hr (LHV)	Daily: 97,296 MMBtu/Day (LHV)	Annually: 29,707,364 MMBtu/yr (LHV)
2	What is the facility's maximum production rate, specify units (reference here and list capacities in Section 20, if more room is required)			
a	Current	Hourly: 600 MW nominal	Daily: 14,400 MW nominal (Hourly * 24)	Annually: 5,256,000 MW nominal (Daily * 365)
b	Proposed	Hourly: 625 MW nominal	Daily: 15,004 MW nominal (Hourly * 24)	Annually: 5,476,489 MW nominal (Daily * 365)

Section 1-D: Facility Location Information

1	Section: 24	Range: 36E	Township: 18S	County: Lea	Elevation (ft): 3,716
2	UTM Zone: <input type="checkbox"/> 12 or <input checked="" type="checkbox"/> 13			Datum: <input type="checkbox"/> NAD 27 <input type="checkbox"/> NAD 83 <input checked="" type="checkbox"/> WGS 84	
a	UTM E (in meters, to nearest 10 meters): 658,413 m E			UTM N (in meters, to nearest 10 meters): 3,622,425 m N	
b	AND Latitude (deg., min., sec.): 32° 43' 47.07" N			Longitude (deg., min., sec.): 103° 18' 34.6" W	
3	Name and zip code of nearest New Mexico town: Hobbs, 88240				
4	Detailed Driving Instructions from nearest NM town (attach a road map if necessary): From Hobbs, drive approximately 7 miles west on the Carlsbad Highway, and turn north just before mile marker 95. Drive north for approximately 1.7 miles passing the Maddox Station on the left, and turn west for 0.3 miles. After passing through an access gate, drive north approximately 0.5 miles to the LPP site location.				
5	The facility is 8 miles West of Hobbs, NM .				
6	Status of land at facility (check one): <input checked="" type="checkbox"/> Private <input type="checkbox"/> Indian/Pueblo <input type="checkbox"/> Federal BLM <input type="checkbox"/> Federal Forest Service <input type="checkbox"/> Other (specify)				
7	List all municipalities, Indian tribes, and counties within a ten (10) mile radius (20.2.72.203.B.2 NMAC) of the property on which the facility is proposed to be constructed or operated: Hobbs, Lea County, NM and Gaines County, TX				
8	20.2.72 NMAC applications only: Will the property on which the facility is proposed to be constructed or operated be closer than 50 km (31 miles) to other states, Bernalillo County, or a Class I area (see www.env.nm.gov/aqb/modeling/classIareas.html)? <input type="checkbox"/> Yes <input type="checkbox"/> No (20.2.72.206.A.7 NMAC) If yes, list all with corresponding distances in kilometers: N/A				
9	Name nearest Class I area: Carlsbad Caverns National Park				
10	Shortest distance (in km) from facility boundary to the boundary of the nearest Class I area (to the nearest 10 meters): 116.2 km				
11	Distance (meters) from the perimeter of the Area of Operations (AO is defined as the plant site inclusive of all disturbed lands, including mining overburden removal areas) to nearest residence, school or occupied structure: 1,680 m from Maddox Station.				
12	Method(s) used to delineate the Restricted Area: Continuous Fencing. "Restricted Area" is an area to which public entry is effectively precluded. Effective barriers include continuous fencing, continuous walls, or other continuous barriers approved by the Department, such as rugged physical terrain with steep grade that would require special equipment to traverse. If a large property is completely enclosed by fencing, a restricted area within the property may be identified with signage only. Public roads cannot be part of a Restricted Area.				
13	Does the owner/operator intend to operate this source as a portable stationary source as defined in 20.2.72.7.X NMAC? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No A portable stationary source is not a mobile source, such as an automobile, but a source that can be installed permanently at one location or that can be re-installed at various locations, such as a hot mix asphalt plant that is moved to different job sites.				
14	Will this facility operate in conjunction with other air regulated parties on the same property? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes If yes, what is the name and permit number (if known) of the other facility?				

Section 1-E: Proposed Operating Schedule (The 1-E.1 & 1-E.2 operating schedules may become conditions in the permit.)

1	Facility maximum operating ($\frac{\text{hours}}{\text{day}}$): 24	($\frac{\text{days}}{\text{week}}$): 7	($\frac{\text{weeks}}{\text{year}}$): 52 (50 maximum per combustion turbine)	($\frac{\text{hours}}{\text{year}}$): 8,670 (8,400 maximum per combustion turbine)
2	Facility's maximum daily operating schedule (if less than 24 $\frac{\text{hours}}{\text{day}}$)? Start: N/A		<input type="checkbox"/> AM <input type="checkbox"/> PM	End: N/A <input type="checkbox"/> AM <input type="checkbox"/> PM
3	Month and year of anticipated start of construction: N/A			
4	Month and year of anticipated construction completion: N/A			
5	Month and year of anticipated startup of new or modified facility: N/A			
6	Will this facility operate at this site for more than one year? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			

Section 1-F: Other Facility Information

1	Are there any current Notice of Violations (NOV), compliance orders, or any other compliance or enforcement issues related to this facility? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes, specify:		
a	If yes, NOV date or description of issue:	NOV Tracking No:	
b	Is this application in response to any issue listed in 1-F, 1 or 1a above? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes, provide the 1c & 1d info below:		
c	Document Title:	Date:	Requirement # (or page # and paragraph #):
d	Provide the required text to be inserted in this permit:		
2	Is air quality dispersion modeling being submitted with this application? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <u>An Air Modeling Waiver was approved for this project.</u>		
3	Does this facility require an "Air Toxics" permit under 20.2.72.400 NMAC & 20.2.72.502, Tables A and/or B? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
4	Will this facility be a source of federal Hazardous Air Pollutants (HAP)? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
a	If Yes, what type of source? <input type="checkbox"/> Major (<input type="checkbox"/> ≥10 tpy of any single HAP OR <input type="checkbox"/> ≥25 tpy of any combination of HAPS) OR <input checked="" type="checkbox"/> Minor (<input checked="" type="checkbox"/> <10 tpy of any single HAP AND <input checked="" type="checkbox"/> <25 tpy of any combination of HAPS)		
b	If 4.a is Yes, identify the subparts in 40 CFR 61 & 40 CFR 63 that apply to this facility (If no subparts apply, enter "N/A."): <u>N/A</u>		
5	Is any unit exempt under 20.2.72.202.B.3 NMAC? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
a	If yes, include the name of company providing commercial electric power to the facility: _____ Commercial power is purchased from a commercial utility company, which specifically does not include power generated on site for the sole purpose of the user.		

Section 1-G: Streamline Application

(This section applies to 20.2.72.300 NMAC Streamline applications only)

1	<input type="checkbox"/> I have filled out Section 18, "Addendum for Streamline Applications." <input checked="" type="checkbox"/> N/A (This is not a Streamline application.)
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Section 1-H: Title V Specific Information

(Fill this section out only if this is a Title V application.)

1	Responsible Official (20.2.70.300.D.2 NMAC):	Phone:
a	R.O. Title:	R.O. e-mail:
b	R. O. Address:	
2	Alternate Responsible Official (20.2.70.300.D.2 NMAC):	Phone:
a	A. R.O. Title:	A. R.O. e-mail:
b	A. R. O. Address:	
3	Company's Corporate or Partnership Relationship to any other Air Quality Permittee (List the names of any companies that have operating (20.2.70 NMAC) permits and with whom the applicant for this permit has a corporate or partnership relationship):	
4	Name of Parent Company ("Parent Company" means the primary name of the organization that owns the company to be permitted wholly or in part.):	
a	Address of Parent Company:	
5	Names of Subsidiary Companies ("Subsidiary Companies" means organizations, branches, divisions or subsidiaries, which are owned, wholly or in part, by the company to be permitted.):	
6	Telephone numbers & names of the owners' agents and site contacts familiar with plant operations:	
7	Affected Programs to include Other States, local air pollution control programs (i.e. Bernalillo) and Indian tribes: Will the property on which the facility is proposed to be constructed or operated be closer than 80 km (50 miles) from other states, local pollution control programs, and Indian tribes and pueblos (20.2.70.402.A.2 and 20.2.70.7.B)? If yes, state which ones and provide the distances in kilometers:	

Section 1-I – Submittal Requirements

Each 20.2.73 NMAC (NOI), a 20.2.70 NMAC (Title V), a 20.2.72 NMAC (NSR minor source), or 20.2.74 NMAC (PSD) application package shall consist of the following:

Hard Copy Submittal Requirements:

- 1) One hard copy **original signed and notarized application package printed double sided ‘head-to-toe’ 2-hole punched** as we bind the document on top, not on the side; except Section 2 (landscape tables), which should be **head-to-head**. If ‘head-to-toe printing’ is not possible, print single sided. Please use **numbered tab separators** in the hard copy submittal(s) as this facilitates the review process. For NOI submittals only, hard copies of UA1, Tables 2A, 2D & 2F, Section 3 and the signed Certification Page are required.
- 2) If the application is for a NSR or Title V permitting action, include one working hard **copy** for Department use. This **copy** does not need to be 2-hole punched. Technical revisions only need to fill out Section 1-A, 1-B, 3, and should fill out those portions of other Section(s) relevant to the technical revision. TV Minor Modifications need only fill out Section 1-A, 1-B, 1-H, 3, and those portions of other Section(s) relevant to the minor modification. NMED may require additional portions of the application to be submitted, as needed.
- 3) The entire NOI or Permit application package, including the full modeling study, should be submitted electronically on compact disk(s) (CD). For permit application submittals, **two CD** copies are required (in sleeves, not crystal cases, please), with additional CD copies as specified below. NOI applications require only a **single CD** submittal.
- 4) If **air dispersion modeling** is required by the application type, include the **NMED Modeling Waiver OR** one additional electronic copy of the air dispersion modeling including the input and output files. The dispersion modeling **summary report only** should be submitted as hard copy(ies) unless otherwise indicated by the Bureau. The complete dispersion modeling study, including all input/output files, should be submitted electronically as part of the electronic submittal.
- 5) If subject to PSD review under 20.2.74 NMAC (PSD) include,
 - a. one additional hard copy and one additional CD copy for US EPA,
 - b. one additional hard copy and one additional CD copy for each federal land manager affected (NPS, USFS, FWS, USDI) and,
 - c. one additional hard copy and one additional CD copy for each affected regulatory agency other than the Air Quality Bureau.

Electronic Submittal Requirements [in addition to the required hard copy(ies)]:

- 1) All required electronic documents shall be submitted in duplicate (2 separate CDs). A single PDF document of the entire application as submitted and the individual documents comprising the application.
- 2) The documents should also be submitted in Microsoft Office compatible file format (Word, Excel, etc.) allowing us to access the text in the documents (copy & paste). Any documents that cannot be submitted in a Microsoft Office compatible format shall be saved as a PDF file from within the electronic document that created the file. If you are unable to provide Microsoft office compatible electronic files or internally generated PDF files of files (items that were not created electronically: i.e. brochures, maps, graphics, etc.), submit these items in hard copy format with the number of additional hard copies corresponding to the number of CD copies required. We must be able to review the formulas and inputs that calculated the emissions.
- 3) It is preferred that this application form be submitted as 3 electronic files (**2 MSWord docs**: Universal Application section 1 and Universal Application section 3-19) and **1 Excel file** of the tables (Universal Application section 2) on the CD(s). Please include as many of the 3-19 Sections as practical in a single MS Word electronic document. Create separate electronic file(s) if a single file becomes too large or if portions must be saved in a file format other than MS Word.
- 4) The **electronic file names** shall be a maximum of 25 characters long (including spaces, if any). The format of the electronic Universal Application shall be in the format: “A-3423-FacilityName”. The “A” distinguishes the file as an application submittal, as opposed to other documents the Department itself puts into the database. Thus, all electronic application submittals should begin with “A-”. Modifications to existing facilities should use the **core permit number** (i.e. ‘3423’) the Department assigned to the facility as the next 4 digits. Use ‘XXXX’ for new facility applications. The format of any separate electronic submittals (additional submittals such as non-Word attachments, re-submittals, application updates) and Section document shall be in the format: “A-3423-9-description”, where “9” stands for the **section #** (in this case Section 9-Public Notice). Please refrain, as much as possible, from submitting any scanned documents as this file format is extremely large, which uses up too much storage capacity in our database. Please take the time to fill out the **header information** throughout all submittals as this will identify any loose pages, including the Application Date (date submitted) & Revision # (0 for original, 1, 2, etc.; which will help keep track of subsequent partial update(s) to the original submittal. The footer information should not be modified by the applicant.

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Section 2

See Excel File “section 2 and emission calculations”

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.env.nm.gov/aqb/permit/app_form.html) for more detailed instructions on SSM emissions.

This application proposes a significant revision to NSR Permit PSD 3449-M3 for Lea Power Partners, LLC (LPP) Hobbs Generating Station (Hobbs).

Hobbs is a natural gas fueled, nominal 600 MW net output power plant with two advanced firing temperature, Mitsubishi 501F combustion turbine generators (CTGs), each provided with its own heat recovery steam generator (HRSG) including duct burners, a single condensing, reheat steam turbine generator (STG), and an air cooled condenser serving the STG. The plant generates electricity for sale to Southwestern Public Service Company, its successors or assigns. The facility is located approximately 9 miles west of Hobbs, New Mexico in Lea County.

In 2014, Hobbs submitted a significant revision application to allow the upgrade of both CTGs in order to improve the station performance. Row 1 Blade Ring, Row 1 Compressor Blades, Rows 1, 2 and 3 Turbine Blades, Rows 1, 2 and 4 and Vanes and Rows 1 and 2 Ring Segments were replaced with new parts with superior cooling technology. This change resulted in the need for less cooling air with a corresponding increase in fuel consumption, exhaust flow rate, temperature, and electricity production.

Although concentrations of NO_x, CO and VOC emitted from the turbine exhaust remained constant, there was an increase in the actual mass emission rates of these pollutants due to the increased exhaust flow rate compared to historical past actual emission rates. Increases in particulate matter (PM₁₀ and PM_{2.5}) and SO₂, also occurred due to increased fuel consumption. Startup, Shutdown and Maintenance (SSM) emissions did not change as a result of this project. However, during the permit application review process, NMED noted that although the permit included a concentration limit for CO during startups, it did not include a mass emission rate limit.

A maximum hourly mass emission rate limit was established during the 2014 permit revision based on information supplied by the catalyst vendor related to expected post-catalyst mass emissions during different types of startups. Based on the vendor information, a mass permit limit of 441 lb/hr was requested. In late 2015, Hobbs experienced a number of exceedances of the allowable CO hourly mass emission rate for startups. The CO BACT level of 3,000 ppmvd @ 15% O₂ was not exceeded. Further review of plant historical data showed that the representation for the mass emission limit in the turbine upgrade permit application in 2014 is not achievable during actual operations.

The mass emission representation provided in the 2014 permitting action assumed that a catalyst temperature of approximately 400°F would be achieved during the early phases of startup. However, the actual operating data shows that startups are frequently initiated with the catalyst temperature below this level. It is evident that the equipment is not capable of achieving the CO mass emission limit as established by PSD-3449-M2. As represented during the 2014 permitting action, SSM emissions did not change as a result of the turbine upgrade project. A revision to the PSD permit is therefore necessary to provide the site with an achievable startup mass emission limit for CO. Since the existing 3,000 ppmv CO dry @ 15% O₂ (ppmvdc) BACT limit will continue to be met, no additional BACT analysis is necessary for this permitting action.

The only pollutant affected by this permitting action is CO during SSM operations. A new hourly SSM mass emission rate limit of 2,060 lb/hr from each unit (HOBB-1 and HOBB-2) is proposed. Only one unit will be in start-up mode at any given time. This limit is based on actual plant operating data, with a safety factor of 25 percent applied. No increase in the achievable BACT limit of 3,000 ppmvdc or in the annual mass emission rate is proposed since these remain unchanged per startup. Additionally, changes to the permit language are necessary to provide clarity regarding three issues that were discovered during the development of this permit application:

- (1) The site DAHS was not calculating the mass emission rate for partial hours as a clock hour (60 minute) average of actual mass emissions emitted over a one-hour period. As a result, hourly emission rates were being recorded in excess of the amount of mass emissions that could be emitted in a 60-minute averaging period. Additional language is proposed to clarify that for the purposes of compliance with the hourly emission rates specified in this permit, one-hour average emission rates (i.e., Block Average) will be calculated as the actual mass of pollutant emitted in a given clock hour.
- (2) It was discovered that the practice specified Permit Condition A401C(3)(iii) of using Part 75 SO₂ data substitution methods for non-valid hours of CO emissions was causing SSM emissions to be substituted into normal operating hour periods. To resolve this issue, Hobbs proposes that the Part 75 NO_x data substitution methods be applied instead and that the hourly emission rate limits specified in Table 106A are not applicable to substituted data that is not from the same load range or operational bin as the missing data.
- (3) A revision to SSM VOC emission rate limit description is necessary because it is not possible to demonstrate compliance with this limit. The limit in the current permit (PSD 3449-M3) assumes that some level of VOC control will be achieved during the startup sequence and that level can be monitored.

A suggested permit markup of affected sections of the permit is included in the following pages, starting with Section 3, Page 3. Within the markup, the text requested to be modified has been changed to red strikethrough font. In blue font is the suggested new text.

SUGGESTED PERMIT MARKUP FOLLOWS

SUGGESTED PERMIT MARKUP**PART A FACILITY SPECIFIC REQUIREMENTS****A100 Introduction**

- A. This permit, PSD 3449-~~M3~~M4, supersedes all portions of Air Quality Permit PSD 3449-~~M2~~M3, issued ~~September 5, 2014~~October 8, 2015, except the portion requiring compliance tests. Compliance test conditions from previous permits, if not completed, are still in effect, in addition to compliance test requirements contained in this permit.

A101 Facility: Description

- A. This facility is a natural gas fueled, nominal 600 MW net output power plant with two advanced firing temperature, Mitsubishi 501F combustion turbine generators (CTGs), each provided with its own heat recovery steam generator (HRSG) including duct burners, a single condensing, reheat steam turbine generator (STG), and an air cooled condenser serving the STG. The plant generates electricity for sale to Southwestern Public Service Company, its successors or assigns.
- B. This facility is located approximately 9 miles west of Hobbs, New Mexico in Lea County.
- C. This modification consists of ~~an increase in the short-term allowable CO SSM mass emission rate to 2,060 lbs/hr from each HOBBS-1 and HOBBS-2. No increase in annual mass emission rate is proposed since the annual average mass emissions per startup remain unchanged. Additional clarifications in the permit language are proposed related to missing data procedures outlined in Condition A401C(3)(iii), the~~ clarification that one-hour block averaging on a clock-hour applies to all short term mass emission rate limits represented in this permit, and the enforceability of the stated VOC emission rate and concentration limits during SSM events. ~~changes to the emissions for auxiliary equipment (units FP-1, G-1, AC1 to 3, and IC 1 to 3). The emission rates have increased for NOx, CO, PM10 and PM2.5 from FP 1 and G 1. The emission rates have increased for TSP, PM10 and PM2.5 from AC 1, AC 2, AC 3, IC 1, IC 2, and IC-3. This modification also adds a new 500 gallon gasoline tank, a 500 gallon diesel tank, and a 100 gallon diesel tank (exempt sources). This modification also removes the "A" and "B" designations from units AC 1 to 3 and units IC1-3 in Table 106.B because these units do not have any subunits: there are only 3 chillers and 3 cooling towers. This description of this modification is for informational purposes only and is not enforceable.~~

A102 Facility: Allowable Emissions

- A. The following Section lists the emission units and their allowable emission limits. (40 CFR 50, 40 CFR 60, Subparts A, III, and KKKK, 40 CFR 63 Subparts A and ZZZZ, 20.2.72.210.A and B.1 NMAC)

Table 106.A: Allowable Emissions for Turbine Generators (Units HOBB-1/DB-1 & HOBB-2/DB-2)

Pollutant	CT w/Duct Burner	CT w/o Duct Burner	CTG ⁹ Startup & Shutdown	Averaging Period
NO ₂ ² (lbs/hr), each	18.1	14.5	193.2	Hourly rolling 24-hour average based on CEMS data (SSM limits are based on a 1-hour block¹¹ average)
NO ₂ ^{2,3} (ppmv) dry @ 15% O ₂ , each	2.0 BACT		96 ¹ BACT	Hourly rolling 24-hour average based on CEMS data
NO ₂ ^{2,4} (lb/MWh), each	0.43		Per NSPS KKKK	Daily rolling 30-day average (NSPS KKKK)
NO ₂ ² (tons/yr), combined	181.0			Daily rolling 365-day total (includes SSM emissions)
CO (lbs/hr), each	11.0	8.8	441 2,060	1-hour block average (Normal operation and SSM)
CO ⁵ (ppmv) dry @ 15% O ₂ , each	2.0 BACT		3000 ¹ BACT	1-hour block average (Normal operation and SSM)
CO (tons/yr), combined	279.5			Daily rolling 365-day total (includes SSM emissions)
VOC (lbs/hr), each	2.8	2.4	77.8	Hourly rolling 24-hour average, calculation based on emission factor determined from compliance test data (VOC SSM limits assume some level of control is achieved during the startup sequence. The SSM limit is not enforceable as continuous monitoring is not possible.)
VOC ⁶ (ppmv) dry @ 15% O ₂ , each	1.0 BACT		187 ¹ BACT	Hourly rolling 24-hour average (SSM limits assume some level of control is achieved during the startup sequence. The SSM limit is not enforceable as continuous monitoring is not possible.)

Pollutant	CT w/Duct Burner	CT w/o Duct Burner	CTG ⁹ Startup & Shutdown	Averaging Period
VOC (tons/yr), combined	96.4			Daily rolling 365-day total (includes SSM emissions)
SO ₂ (lbs/hr), each	10.7	8.4	N/A	1-hour block average, calculation based on Sulfur content of fuel
SO ₂ ⁷ (lb/MMBtu), each	0.06		Per NSPS KKKK	Daily rolling 30-day average (NSPS KKKK)
SO ₂ (tons/yr), combined	48.2			Daily rolling 365-day total (includes SSM emissions)
TSP/PM ₁₀ /PM _{2.5} ⁸ (lbs/hr), each	17.1	11.3	N/A	Hourly rolling 24-hour average, calculation based on emission factor determined from compliance test data
TSP/PM ₁₀ (lb/MMBtu), each ¹⁰	0.0089	0.0071	N/A	Hourly rolling 24-hour average
TSP/PM ₁₀ /PM _{2.5} (tons/yr), combined	85.8			Daily rolling 365-day total (includes SSM emissions)
NH ₃ (lbs/hr) each	32.1		N/A	Calculation based on compliance test data
NH ₃ (tons/yr), combined	281.3		N/A	Daily rolling 365-day total

¹ NO₂ and CO CTG Startup not-to-exceed emissions are based on manufacturer's data + a 20% safety factor as a 1-hr average. Compliance with these limits shall be demonstrated by the monitoring required in Condition A401.C. VOC CTG Startup not-to-exceed emissions are based on manufacturer's data + a 20% safety factor and assume some level of control during the startup sequence. Compliance with these limits is not enforceable as continuous monitoring is not possible.

² Nitrogen oxide emissions include all oxides of nitrogen expressed as NO₂.

³ The NO₂ limit of 2.0 ppmvd is based on the SCR BACT determination submitted with the application no. 3449.

⁴ This NO₂ limit is in accordance with Table 1 to NSPS Subpart KKKK.

⁵ The CO limit of 2.0 ppmvd is based on the CatOx BACT determination submitted with the application no. 3449.

⁶ The VOC limit of 1.0 ppmvd is based on the CatOx BACT determination submitted with the application no. 3449.

⁷ The SO₂ limit is in accordance with 40 CFR 60.4330.

⁸ The TSP/PM₁₀/PM_{2.5} limits include condensable particulate matter.

⁹ N/A" indicates that startup and shutdown emissions are less than or included in the emissions limits established for normal operation.

¹⁰ PSD3449R6 reduced lb/MMBtu from 0.015 combined to 0.0089 and 0.0071.

¹¹ A "Block Average" is defined as the total mass of emissions emitted in a clock hour (xx:00 to xx:59) divided by 1 hour.

A. Routine and Predictable SSM lb/hr (1-hour block average) and BACT Emission Limits – HOBB-1/DB-1 and HOBB-2/DB-2

C. Continuous Emission Monitoring (CEMS) For Units HOBB-1/DB-1 and HOBB-2/DB-2

Requirement: To demonstrate compliance with the allowable NO_x, CO, VOC, SO_x and TSP/PM₁₀/PM_{2.5} emission limits in Table 106.A and with NSPS KKKK limits, the permittee shall meet the following Continuous Emissions Monitoring System (CEMS) requirements and the following monitoring, recordkeeping, and reporting requirements.

1. The exhaust stacks for these units shall be equipped and maintained with NO_x, CO and O₂ CEMS. The permittee shall maintain the units according to manufacturer's requirements.
2. The NO_x and O₂ CEMS shall be designed, installed and certified in accordance with 40 CFR Part 75. Alternatively, the NO_x CEMS may be installed and certified in accordance with the provisions of 40 CFR Part 60, Appendix B, Performance Specification 2 (PS2) – Specifications and Test Procedures for SO₂ and NO_x Continuous Emissions Monitoring Systems in Stationary Sources.
3. The CO CEMS shall be designed, installed and certified in accordance with the provisions of 40 CFR Part 60, Appendix B, Performance Specification 4A – Specification and Test Procedure for Carbon Monoxide Continuous Emissions Monitoring Systems in Stationary Sources. Following certification testing, the CO CEMS shall be operated in accordance with the provisions of 40 CFR Part 60, Appendix F – Quality Assurance Requirements for Continuous Emissions Monitoring Systems.

Monitoring:

1. All CEMS shall comply with the requirements of 40 CFR 60.13, Monitoring Requirements. *For the purpose of complying with one hour emission rate limits specified in this permit, all data collected will be used [60.13(h)(2)(v)] to determine the mass of pollutant emitted during any given clock hour (i.e., Block Average).*
2. The NO_x CEMS shall also comply with the requirements of 40 CFR 60.4345.
3. The CEMS shall monitor all instances of excess emissions during startups, shutdowns, maintenance and malfunctions, including those associated with control equipment upset.

Recordkeeping:

- (1) The permittee shall keep a quality assurance plan for all CEMS in accordance with 40 CFR 60.4345 and 40 CFR 75, Appendix B.
- (2) The permittee shall monitor and record all instances in which the CEMS are not in operation or accurately recording stack concentrations.
- (3) The permittee shall ensure that all of the required monitoring systems are installed and meet the following requirements:
 - i) The NO_x and CO₂ or O₂ CEMS shall be audited in accordance with 40 CFR Part 60 Subpart KKKK or 40 CFR Part 75. The CO CEMS shall be audited in accordance with 40 CFR Part 60, Appendix F.
 - ii) The reported output of the CEMS shall be in:

- a. ppmv of NO_x and CO at dry standard conditions;
- b. ppmv of NO_x and CO corrected to 15% oxygen at dry standard conditions; and lbs/hr of NO_x and CO.

iii) The QA/QC plan required by 40 CFR Part 60, Appendix F, shall include a data substitution procedure for the CO CEMS that is consistent with requirements of 40 CFR Part 75's missing data procedure for ~~SO₂~~ NO_x data. The QA/QC plan shall be submitted to the Department with the test protocols. **The hourly emission rate limits specified in Table 106A are not applicable to substituted data that is not from the same load range or operational bin as the missing data.**

(4) For each CEMS, the permittee shall maintain records of performance test measurements, all performance evaluations, calibration checks, and all adjustment and maintenance activities.

(5) The permittee shall maintain records of the following requirements using data from the CEMS (DAHS) to demonstrate compliance with established emission limits:

i) For NO_x:

- (1) The 24-hour average lb/hr.
- (2) The 24-hour average parts per million by volume (on a dry standard cubic foot basis, corrected to 15% O₂).
- (3) The daily-rolling 30-day average lb/MWh (calculated in accordance with NSPS KKKK, 60.6350).
- (4) The daily-rolling 365-day total tons/year for the combined units (updated monthly by the 15th of the following month) including any emissions during routine or predictable startup, shutdown, and scheduled maintenance (SSM).

ii) For CO:

- (1) The one-hour **block** average lb/hr (**Normal operation and SSM**).
- (2) The one-hour **block** average ppmvd @ 15% O₂ (**Normal operation and SSM**).
- (3) The daily-rolling 365-day total tons/year for the combined units (updated monthly by the 15th of the following month) including any emissions during routine or predictable startup, shutdown, and scheduled maintenance (SSM).

iii) For VOC:

- (1) The 24-hour average lb/hr calculated by DAHS using the heat input and the emission factor determined by the most recent compliance test.
- (2) The 24-hour average CO concentration in ppmvd @ 15% O₂, using the 1 hr **block** average CO CEMS output (Compliance with the 24-hr average CO concentration limits in ppmvd@15% O₂ shall also demonstrate compliance with the 24-hr average VOC concentration in ppmvd@15% O₂).
- (3) The daily-rolling 365-day total tons/year for the combined units (updated monthly by the 15th of the following month) including any emissions during routine or predictable startup, shutdown, and scheduled maintenance (SSM).

iv) For SO₂:

- (1) One-hour **block** average lb/hr calculated by DAHS using the heat input and the emission factor calculated using (1) Equation D-1h from 40 CFR 75, Appendix

D, Section 2.3.2.1.1 and (2) the sulfur content from the current valid tariff or annual sulfur sampling results. Additionally, 40 CFR 75, Appendix D, Section 2.3.1.1 may also be used for the SO₂ emission factor as applicable.

- (2) The daily-rolling 30-day average lb/MMBtu calculated by the DAHS using (1) Equation D-1h from 40 CFR 75, Appendix D, Section 2.3.2.1.1 and (2) the sulfur content from the current valid tariff or annual sulfur sampling results. Additionally, 40 CFR 75, Appendix D, Section 2.3.1.1 may also be used for the SO₂ emission factor as applicable.
- (3) The daily-rolling 365-day total tons/year for the combined units (updated monthly by the 15th of the following month) including any emissions during routine or predictable startup, shutdown, and scheduled maintenance (SSM).

v) For TSP/PM₁₀/PM_{2.5}:

- (1) The 24-hour average lb/hr calculated by DAHS using the heat input and the emission factor determined by the most recent compliance test required by Condition A401.A.
- (2) The daily-rolling 24-hour average lb/MMBtu rates of TSP and PM₁₀ calculated by direct conversion of the hourly emissions calculated above in v)(1). This requirement is not applicable for PM_{2.5}.
- (3) The daily-rolling 365-day total tons/year emissions calculated by DAHS using the heat input and the emission factor determined by the most recent initial compliance test required by Condition A401.A. The ton per year emissions shall include any emissions during routine or predictable startup, shutdown, and scheduled maintenance (SSM).

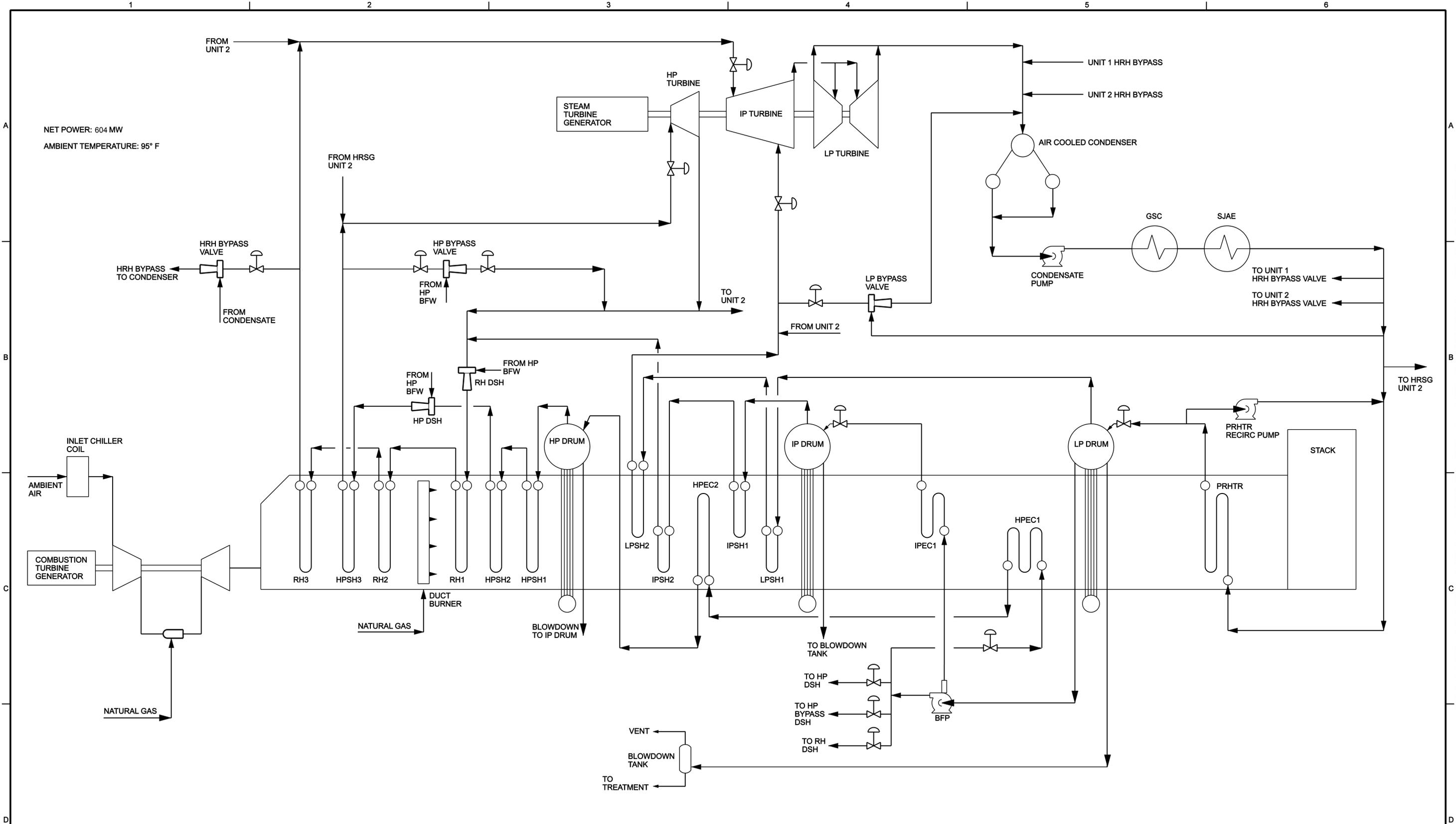
Reporting: All CEMS shall be subject to the notification requirements of 40 CFR 60.7. The QA/QC plan shall be submitted to the Department with the Compliance Test Protocols.

Section 4

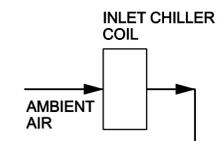
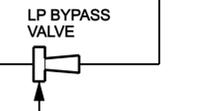
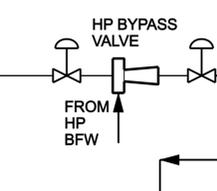
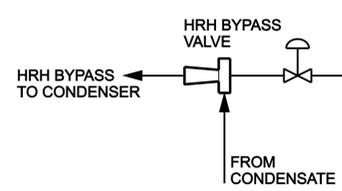
Process Flow Sheet

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.

[A process flow diagram is attached.](#)



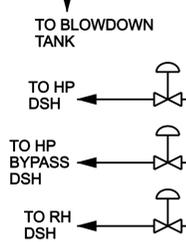
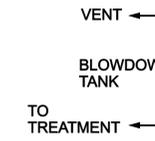
NET POWER: 604 MW
 AMBIENT TEMPERATURE: 95° F



NATURAL GAS

NATURAL GAS

BLOWDOWN TO IP DRUM



NO.	DATE	REVISION	BY	CHK	REVISION APPROVAL		REV A	DATE 09/21/06	STATUS					
					DISCIPLINE	REVIEWED			DISCIPLINE	REVIEWED	ISSUED	REV	DATE	DM
P1	09/07/06	ISSUED FOR PRELIMINARY DESIGN	EFC	BR	CIVIL		ELECTRICAL		ISSUED	P1	09/07/06	DM	SDE	PEM
A	09/21/06	ISSUED FOR REVIEW	EFC	BR	STRUCTURAL		INST & CONTROL		PRELIMINARY			RP	BR	AW
					MECHANICAL		ARCHITECTURAL		FOR REVIEW AND APPROVAL	A				
					PROCESS		ENVIRONMENTAL		APPROVED FOR CONSTRUCTION					
					PIPING		GEN. ARRANG.		REVISED & APPROVED FOR CONSTRUCTION					

SPS-EXCEL
 Colorado Energy Management
HOBBS POWER STATION
 Hobbs, NM
 PROJECT NO. 349552
LG Constructors

PROCESS FLOW DIAGRAM
HEAT BALANCE SHEET 1
 2 x 1 MHI 501 F
 DWG. NO. HB-PR-10-10-01
 REV. A

SCALE NONE

BAR IS ONE INCH ON ORIGINAL DRAWING.

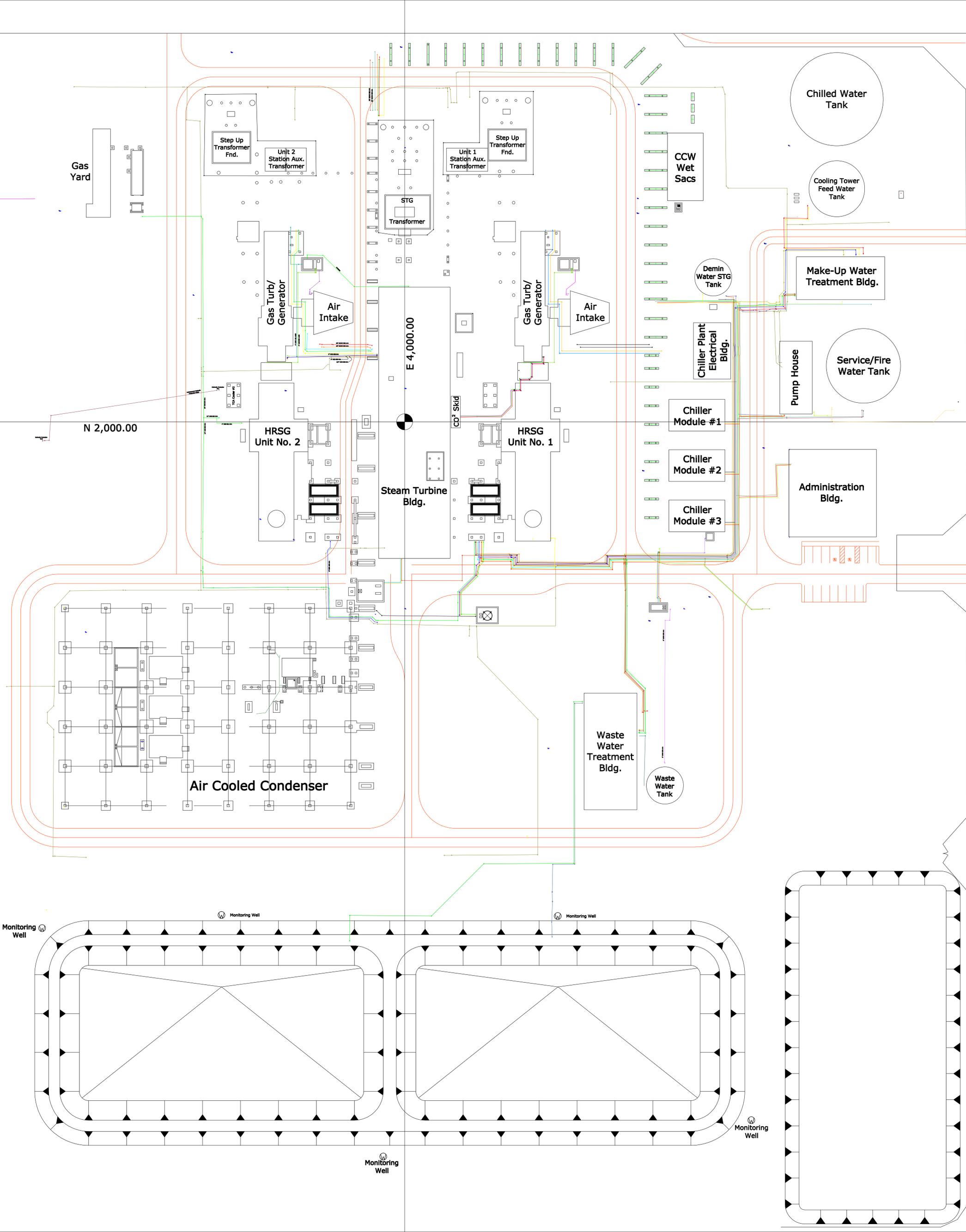
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Section 5

Plot Plan Drawn To Scale

A **plot plan drawn to scale** showing emissions points, roads, structures, tanks, and fences of property owned, leased, or under direct control of the applicant. This plot plan must clearly designate the restricted area as defined in UA1, Section 1-D.12. The unit numbering system should be consistent throughout this application.

A Plot Plan drawn to scale is attached.



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 rationale 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.env.nm.gov/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.

Road Calculations: Calculate fugitive particulate emissions and enter haul road fugitives in Tables 2-A, 2-D and 2-E for:

1. If you transport raw material, process material and/or product into or out of or within the facility and have PER emissions greater than 0.5 tpy.
2. If you transport raw material, process material and/or product into or out of the facility more frequently than one round trip per day.

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.

Control Devices: In accordance with 20.2.72.203.A(3) and (8) NMAC, 20.2.70.300.D(5)(b) and (e) NMAC, and 20.2.73.200.B(7) NMAC, the permittee shall report all control devices and list each pollutant controlled by the control device

regardless if the applicant takes credit for the reduction in emissions. The applicant can indicate in this section of the application if they chose to not take credit for the reduction in emission rates. For notices of intent submitted under 20.2.73 NMAC, only uncontrolled emission rates can be considered to determine applicability unless the state or federal Acts require the control. This information is necessary to determine if federally enforceable conditions are necessary for the control device, and/or if the control device produces its own regulated pollutants or increases emission rates of other pollutants.

As required by NMED, emission rate calculations are provided in the UA2 workbook. The only change proposed relates to the CO mass emission rate limits during SSM activities. As described in Error! Reference source not found., catalyst vendor data for startups assumes that the catalyst has reached a temperature at which some level of control efficiency may be achieved. However, the actual operating data shows that for cold startups, there is a period of time during which there is fuel flow and emissions, but during time which the catalyst is not yet performing optimally. During the early phases of the cold startup events, there is virtually no CO control available. During these times, the emissions are consistent with the turbine vendor estimate of the uncontrolled exhaust concentration from the combustion turbines.

An analysis of the 2015 startup emissions and corresponding catalyst temperatures was conducted to identify the maximum hourly CO mass emission rate that was actually achievable during normal startup scenarios. The raw data, summary graphs, and emission rate calculation basis are all provided in the UA2 workbook. A comparison was made to the 2013 and 2014 startup data (pre-turbine upgrade) to confirm that startup emission characteristics did not change from pre-upgrade project to post-upgrade project.

The requested new hourly SSM mass emission rate limit for CO of 2,060 lb/hr from each unit (HOBB-1 and HOBB-2) represents the maximum cold startup hourly mass emission rate experienced during 2015 (1,648 lbs/hr) with a safety factor of 25% applied. Additionally, permit language changes are requested to make it clear that the hourly mass emission rate limits apply to block hour average emissions during any given clock hour (HH:00 to HH:59) proposed.

No increase in the achievable BACT limit of 3,000 ppmvdc or in the annual emissions is necessary, since only the short-term maximum hourly mass emission rate is impacted. On an annual average basis, the total emissions per startup remains unchanged from the previous permit application representation.

The basis of the startup/shutdown emissions has not changed since the original permit application submittal in 2014:

A startup is initiated when the Data Acquisition and Handling System (DAHS) detects a flame signal (or equivalent signal) and ends when the permissive for the emission control system are met (i.e., steady state emissions compliance is achieved). The turbines will have the following typical startups, defined in general as:

- *Cold Startup: is a startup after an extended CTG shutdown of greater than 12 hours or after such time as the SCR or oxidation catalyst has cooled to below levels that allow optimal control efficiency.*
- *Warm Startup: is a startup after a CTG shutdown of 6 to 12 hours.*
- *Hot Startup: is a startup after a CTG shutdown of less than 6 hours.*

A shutdown begins when the load drops to the point at which steady state emissions compliance can no longer be assured and ends when a flame-off signal is detected.

For permitting purpose only, a worst case scenario has been developed, which assumes for each turbine a total of 60 cold startups, 70 warm startups, 50 hot startups and 180 shutdowns on an annual basis. Based on historical performance information, the duration of the cold startup is approximately 180 minutes per event, a warm startup approximately 120 minutes per event, and a hot startup approximately 90 minutes per event. Shutdowns are 25 minutes per event. These numbers and/or durations of planned startup and shutdown events are provided solely for the purpose of estimating maximum mass emission rates. This specific number of events and event durations are not to be

construed as binding. Rather, Hobbs will demonstrate compliance by meeting the stated short and long term mass emission rates and concentration limits.

HOBBS EMISSION RATE SUMMARY

Summary of Emission Rates

Air Pollutant	Averaging Period	Table 106.A PSD 3449-M3 (October 8, 2015)			Combustion Turbines Emission Rates		
		CT w/o Duct Burner	CT w/ Duct Burner	CTG Startup & Shutdown	CT w/o Duct Burner	CT w/ Duct Burner	CTG Startup & Shutdown
NO ₂ (lbs/hr), each ⁽¹⁾	Hourly rolling 24-hour average based on CEMS data (SSM limits are based on a 1-hour block average)	14.5	18.1	193.2	14.5	18.1	193.2
NO ₂ (ppmv) dry @ 15% O ₂ , each ^{(2),(3)}	Hourly rolling 24-hour average based on CEMS data	2.0 BACT		96 BACT	2.0		96
NO ₂ (lb/MWh), each ⁽⁴⁾	Daily rolling 30-day average (NSPS KKKK)	0.43		Per NSPS KKKK	0.43		Per NSPS KKKK
NO ₂ (tons/yr), combined	Daily rolling 365-day total (includes SSM emissions)	181.0			181.0		
CO (lbs/hr), each	1-hour block average (Normal operation and SSM)	8.8	11.0	441.0	8.8	11.0	2,060.0
CO (ppmv) dry @ 15% O ₂ , each ^{(5),(6)}	1-hour block average (Normal operation and SSM)	2.0 BACT		3,000 BACT	2.0		3,000
CO (tons/yr), combined	Daily rolling 365-day total (includes SSM emissions)	279.5			279.5		
VOC (lbs/hr), each	Hourly rolling 24-hour average, calculation based on emission factor determined from compliance test. (SSM limits assume some level of control is achieved during the startup sequence. The SSM limit is not enforceable as continuous monitoring is not possible.)	2.4	2.8	77.8	2.4	2.8	77.8
VOC (ppmv) dry @ 15% O ₂ , each ^{(7),(8)}	Hourly rolling 24-hour average (data (SSM limits assume some level of control is achieved during the startup sequence. The SSM limit is not enforceable as continuous monitoring is not possible.)	1.0 BACT		187 BACT	1.0		187
VOC (tons/yr), combined	Daily rolling 365-day total (includes SSM emissions)	96.4			96.4		
SO ₂ (lbs/hr), each ⁽⁹⁾	1-hour block average, calculation based on Sulfur content of fuel	8.4	10.7	N/A	8.4	10.7	N/A
SO ₂ (lbs/MMBtu), each ⁽¹⁰⁾	Daily rolling 30-day average (NSPS KKKK)	0.06		Per NSPS KKKK	0.06		Per NSPS KKKK
SO ₂ (tons/yr), combined	Daily rolling 365-day total (includes SSM emissions)	48.2			48.2		
TSP/PM ₁₀ /PM _{2.5} (lbs/hr), each	Hourly rolling 24-hour average, calculation based on emission factor determined from compliance test data	11.3	17.1	N/A	11.3	17.1	N/A
TSP/PM ₁₀ (lbs/MMBtu), each	Hourly rolling 24-hour average	0.0071	0.0089	N/A	0.0071	0.0089	N/A
TSP/PM ₁₀ /PM _{2.5} (tons/yr), combined	Daily rolling 365-day total (includes SSM emissions)	85.8			85.8		
NH ₃ (lbs/hr), each	Calculation based on compliance test data	32.1		N/A	32.1		N/A
NH ₃ (tons/yr), combined	Daily rolling 365-day total	281.3		N/A	281.3		N/A

Notes:

- (1) Nitrogen oxide emissions include all oxides of nitrogen expressed as NO₂.
- (2) The NO₂ limit of 2.0 ppmvd @ 15% O₂ is based on the SCR BACT determination.
- (3) The NO₂ limit of 96 ppmvd @ 15% O₂ during Startup & Shutdown is based on CTG performance manufacturer's data plus a 20% safety factor.
- (4) NO₂ output base limit in accordance with Table 1 to NSPS Subpart KKKK.
- (5) The CO limit of 2.0 ppmvd @ 15% O₂ is based on the oxidation catalyst BACT determination.
- (6) The CO limit of 3,000 ppmvd @ 15% O₂ during Startup & Shutdown is based on CTG performance manufacturer's data plus a 20% safety factor.
- (7) The VOC limit of 1.0 ppmvd @ 15% O₂ is based on the oxidation catalyst BACT determination.
- (8) The VOC limit of 187 ppmvd @ 15% O₂ during Startup & Shutdown is based on CTG performance manufacturer's data plus a 20% safety factor. This number assumes some VOC control is achieved. Continuous demonstration of compliance with this limit is not possible, therefore, this should not be considered an enforceable limit.
- (9) The proposed post-project SO₂ allowable emission rate is based in total sulfur content in the fuel (40 CFR Part 75).
- (10) SO₂ input base limit in accordance with NSPS Subpart KKKK, §60.4330.

Rolling average period was used to identify worst case scenario and is not intended to be an operational restriction.

(2) Emission factor (lb/event) represents the total mass emission during the event duration based on vendor performance data. Represented number reflects an average annual value.

Air Pollutant	Status	CT w/o Duct Burner ppmvd @ 15% O ₂	CT w/ Duct Burner ppmvd @ 15% O ₂	CT w/o Duct Burner per Unit		CT w/Duct Burner per Unit	
				Min. Hourly (lb/hr)	Max. Hourly (lb/hr)	Min. Hourly (lb/hr)	Max. Hourly (lb/hr)
NO _x	pre-control	25.1	21.9	141.0	172.0	147.60	178.6
	post-control	2.0	2.0	11.3	13.7	13.9	16.3
CO	pre-control	15.1	13.5	52.0	63.0	55.8	66.8
	post-control	2.0	2.0	6.9	8.3	8.5	9.9
VOC	pre-control	2.0	1.8	3.9	4.8	4.3	5.2
	post-control	1.0	1.0	2.0	2.4	2.4	2.8
SO ₂	-	0.9	0.9	6.9	8.4	8.6	10.0
TSP/PM ₁₀ /PM _{2.5}	-	-	-	9.8	11.2	15.5	17.0
NH ₃	-	10	10	21	25.3	25.8	30.2

Notes:

- (1) Estimated post-project hourly mass emission rates. Refer to "100% Load CTG Hourly" for detailed calculations.

HOBBS EMISSION RATE SUMMARY

Estimated Post-Project Annual Emission Rates Summary

Air Pollutant	Status	Annual Emission Rates Per Unit w/o SSM ⁽¹⁾			Annual Emission Rates Per Unit w/SSM ⁽²⁾			Annual Both Units Combined w/o SSM (tpy) ⁽³⁾	Annual Both Units Combined w/SSM (tpy) ⁽⁴⁾
		CT w/o Duct Burner (tpy)	CT w/Duct Burner (tpy)	Annual per Unit (tpy)	CT w/o Duct Burner (tpy)	CT w/Duct Burner (tpy)	Annual per Unit (tpy)		
NOx	pre-control	392.2	310.4	676.8	355.2	310.4	639.7		
	post-control	31.4	28.6	57.8	28.4	28.6	54.8	115.52	181.0
CO	pre-control	143.7	116.3	250.3	130.1	116.3	236.7		
	post-control	19.1	17.4	35.2	17.3	17.4	33.4	70.3	279.5
VOC	pre-control	10.9	9.1	19.2	9.9	9.1	18.2		
	post-control	3.3	3.0	5.9	3.0	3.0	5.6	11.8	96.4
SO ₂		12.6	11.6	22.8	11.4	11.6	21.6	45.6	48.2
TSP/PM ₁₀ /PM _{2.5}		18.4	24.4	40.7	16.7	24.4	38.9	81.3	85.8
NH ₃		58.1	53.0	106.9	52.6	53.0	101.4	213.8	202.8
CO ₂		492,156	452,894	945,051	445,652	452,894	898,546	1,890,101	1,832,534
N ₂ O		0.9	0.8	1.8	0.8	0.8	1.7	3.5	3.4
CH ₄		9.1	8.4	17.5	8.3	8.4	16.7	35.1	34.0
GHG		492,166	452,904	945,070	445,661	452,904	898,564	1,890,140	1,832,571
CO ₂ e		492,656	453,355	946,011	446,105	453,355	899,459	1,892,022	1,834,397

Notes:

(1) Estimated post-project annual mass emission rates without SSM events per unit.

CTG w/o DB annual operational hours 4,974 hr/yr (outage = 204 hr/yr)
 CTG w/DB annual operational hours 3,786 hr/yr (outage = 156 hr/yr)
 CTG SSM annual operating hours 0 hr/yr
 CTG Annual Outage days 15 days/yr
 CTG Annual Outage hours 360 hr/yr (No outage hours accounted for GHG calculations)
 Total CTG annual operating hours 8,400 hr/yr

Annual Total (w/o SSM) = CTG w/o DB (tpy) + CTG w/DB (tpy) - [Hourly (lb/hr) * Outage Hours (hr/yr) * 1 ton/2,000lb]_{w/o DB} - [Hourly (lb/hr) * Outage Hours (hr/yr) * 1ton/2,000lb]_{w/DB}

NOx Post-Control Annual Total (w/o SSM) = 31.4 tpy + 28.6 tpy - [11.3 lb/hr * 204 hr/yr * 1 ton/2,000 lb] - [13.9 lb/hr * 156 hr/yr * 1 ton/2,000lb] = 57.8 tpy per unit

(2) Estimated post-project annual mass emission rates including SSM events per unit.

CTG w/o DB annual operational hours 4,504 hr/yr (outage = 196 hr/yr)
 CTG w/DB annual operational hours 3,786 hr/yr (outage = 164 hr/yr)
 CTG SSM annual operating hours 470 hr/yr
 CTG Outage days 15 days/yr
 CTG Outage hours 360 hr/yr (No outage hours accounted for GHG calculations)
 Total CTG annual operating hours 7,460 hr/yr

Annual Total (w/SSM) = CTG w/o DB (tpy) + CTG w/DB (tpy) - [Hourly (lb/hr) * Outage Hours (hr/yr) * 1 ton/2,000lb]_{w/o DB} - [Hourly (lb/hr) * Outage Hours (hr/yr) * 1ton/2,000lb]_{w/DB}

NOx Post-Control Annual Total (w/SSM) = 28.4 tpy + 28.6 tpy - [11.3 lb/hr * 196 hr/yr * 1 ton/2,000 lb] - [13.9 lb/hr * 164 hr/yr * 1 ton/2,000lb] = 54.8 tpy per unit

(3) Estimated post-project annual mass emission rates without SSM events. Represents an operation at 100% load for 8,400 hr/yr (360 hr of outage per year).

NOx Post-Control Annual Total w/o SSM = 57.8 tpy/unit * 2 units = 115.5 tpy both units combined

(4) Estimated post-project annual mass emission rates with SSM events. Represents an operation at 100% load for 7,460 hr/yr (470 hr/yr SSM and 360 hr of outage per year).

NOx Post-Control Annual Total (w/SSM) = (54.8 tpy/unit + 35.7 tpy/unit SSM) * 2 units = 181.0 tpy both units combined

Estimated Post-Project SSM Emission Rates Summary⁽¹⁾

Air Pollutant	CTG Startup & Shutdown		
	ppmvd @ 15% O ₂	lb/hr	tpy
NOx	96	193.2	35.7
CO	3,000	2,060.0	106.4
VOC	187	77.8	42.6
SO ₂	-	10.7	2.5
TSP/PM ₁₀ /PM _{2.5}	-	17.1	4.0
CO ₂	-	-	17,720.8
N ₂ O	-	-	0.033
CH ₄	-	-	0.33
GHG	-	-	17,721.2
CO ₂ e	-	-	17,738.8

Notes:

(1) Estimated post-project hourly and annual SSM mass emission rates. Refer to "CTG SSM Events" for detailed calculations.

HOBBS CTG STARTUP & SHUTDOWN EMISSION RATE SUMMARY

CTG Startup & Shutdown Emission Rates per Unit

Air Pollutant	ppmvd @ 15% O ₂ ⁽¹⁾	Max. Hourly (lb/hr) ⁽²⁾	Annual (tpy) ⁽³⁾
NOx	96.0	193.2	35.7
CO	3,000.0	2,060.0	106.4
VOC	187	77.8	42.6
SO ₂	-	10.7	2.5
TSP/PM ₁₀ /PM _{2.5}	-	17.1	4.0
CO ₂	-	-	17,721
N ₂ O	-	-	0.03
CH ₄	-	-	0.33
GHG ⁽⁴⁾	-	-	17,721
CO ₂ e ⁽⁴⁾	-	-	17,739

Notes:

- (1) Maximum exhaust concentration per vendor performance data at reduced loads, plus a 20% safety factor for NOx and VOC.
CO concentration value is based on historical observations, and turbine vendor estimates. VOC concentration assumes some control by the catalyst during startup sequence.
- (2) Proposed maximum hourly emissions represent the maximum 1-hr NOx, CO, SO₂, and particulate emission rates due to any startup or shutdown event.
 - Data as provided by vendor
 - The CO concentration value is based on historical observations, and turbine vendor estimates.
 - The VOC hourly rate assumes partial control is achieved during the startup.
 - Hourly SO₂, PM₁₀/PM_{2.5}, and NH₃ emission rates are expected to be within the routine operations limits, therefore no SU/SD Hourly emission rates are proposed for these pollutants.
- (3) Annual emissions represent the sum of total proposed annual startups and shutdowns.
- (4) GHG and CO₂e represent the sum of all CTG startup & shutdown at reduced load performance
 GHG CTG startup & shutdown = 2,196 tpy + 2,574 tpy + 4,333 tpy + 6,992 tpy + 1,627 tpy = 17,721 tpy

Startup/Shutdown Events Characteristics per Unit

Air Pollutant	Cold Startup				Warm Startup				Hot Startup				Shutdown		
	Max. Emission Rate (lb/hr) ⁽¹⁾	Emission Factor (lb/event) ⁽²⁾	Event Duration (min) ⁽³⁾	No. Events per Year ⁽³⁾	Max. Emission Rate (lb/hr) ⁽¹⁾	Emission Factor (lb/event) ⁽²⁾	Event Duration (min) ⁽³⁾	No. Events per Year ⁽³⁾	Max. Emission Rate (lb/hr) ⁽¹⁾	Emission Factor (lb/event) ⁽²⁾	Event Duration (min) ⁽³⁾	No. Events per Year ⁽³⁾	Emission Factor (lb/event) ⁽²⁾	Event Duration (min) ⁽³⁾	No. Events per Year ⁽³⁾
NOx	169.5	453.0			164.4	289.8			193.2	240.0			66.7		
CO	2,060.0	1,723			427.7	1,056			140.4	375			93		
VOC	71.8	494	180	60	77.8	405	120	70	61.0	311	90	50	65	25	180
SO ₂	10.7	32.1			10.7	21.4			10.7	16.1			4.5		
TSP/PM ₁₀ /PM _{2.5}	17.1	51.3			17.1	34.2			17.1	25.7			7.1		

Notes:

- (1) Cold, warm and hot startup hourly mass emission rates (lb/hr) represent the worst 60 minute rolling period at reduced loads vendor performance data. Detailed calculations are provided below. Partial VOC control is assumed.
Rolling average period was used to identify worst case scenario and is not intended to be an operational restriction.
- (2) Emission factor (lb/event) represents the total mass emission during the event duration based on vendor performance data. Represented number reflects an average annual value.
 NOx, SO₂, PM, NH₃ (lb/event) = [(min/event * lb/hr) @ 0% Load + (min/event * lb/hr) @ 20% Load + (min/event * lb/hr) @ 40% Load + (min/event * lb/hr) @ 50% Load + (min/event * lb/hr) @ 75% Load] * 1hr / 60 minutes
 CO, VOC (lb/event) as provided by vendor
 NOx Cold SU = [17 min/event * 92.2 lb/hr + 128 min/event * 152.5 lb/hr + 14 min/event * 222.8 lb/hr + 14 min/event * 148.1 lb/hr + 6 min/event * 123.1 lb/hr] * 1hr/60 min = 453.0 lb/event
- (3) Based on historical operational knowledge on startup and shutdown duration and frequency.

HOBBS CTG STARTUP & SHUTDOWN EMISSION RATE SUMMARY

Duration at Each Load Level per Unit

Mode	Duration per Load Level ¹ (min)					Event Duration (min)	No. of Events (events/yr)	Duration of Events (hr/yr)	CO (lbs/event) ²	VOC (lbs/event) ²
	75% CTG Load	50% CTG Load	40% CTG Load	20% CTG Load	0% CTG Load					
Cold Startup	6	14	14	128	17	180	60	180	1,723	494
Warm Startup	7	12	10	68	23	120	70	140	1,056	405
Hot Startup	9	11	39	3	28	90	50	75	375	311
Shutdown	2.55	3.06	10.71	0.77	7.91	25	180	75	93	65
Total							360	470		

Notes:

- (1) Based on historical operational knowledge on startup duration and frequency.
- (2) Based on data supplied by catalyst vendor.

Emission Rate at Each Load Level per Unit

COLD STARTUP

Air Pollutant	Units	75% CTG Load 565 °F @ Catalyst		50% CTG Load 529 °F @ Catalyst		40% CTG Load 524 °F @ Catalyst		20% CTG Load 468 °F @ Catalyst		0% CTG Load 404 °F @ Catalyst	
		Pre Catalyst	Post Catalyst	Pre Catalyst	Post Catalyst	Pre Catalyst	Post Catalyst	Pre Catalyst	Post Catalyst	Pre Catalyst	Post Catalyst
		NOx	ppmvd @ 15% O ₂	25.0	-	40.0	-	70.0	-	70.0	-
	lb/hr	123.1	-	148.1	-	222.8	-	152.5	-	92.2	-
CO	ppmvd @ 15% O ₂	10.0	1.8	15.0	1.9	120.0	15.4	2,500	1,553	2,500	2,937
	lb/hr	30.0	5.4	33.8	4.3	232.6	29.8	3,316	2,060	1,754	2,060
VOC	ppmvd @ 15% O ₂	2.0	0.7	2.5	0.9	7.8	2.7	196.0	68.6	750.0	300.0
	lb/hr	3.4	1.2	3.2	1.2	8.7	3.0	148.9	52.1	301.3	120.5

Notes:

- (1) During cold startup period the SCR will not be operational. The oxidation catalyst will attain limited oxidation capabilities once adequate temperature is reached.
- (2) As calculated in Reduced Load CTG Hourly
- (3) Post startup CO concentration values for the 0 to 20% load cases are back-calculated based on maximum observed historical mass emission rates. Refer to detailed calculations.

Ramp	COLD STARTUP						
	NOx (lb/hr)	CO (lb/hr)	VOC (lb/hr)	SO ₂ (lb/hr)	TSP/PM ₁₀ (lb/hr)	VOC (ppmvd)	
						Pre Catalyst	Post Catalyst
0% to 20%	135.1	2,060.0	71.8	2.5	7.6	355.5	135.2
20%	152.5	2,060.0	52.1	2.8	7.6	196.0	68.6
20% to 40%	169.5	1,569.7	40.2	3.1	7.6	150.6	52.7
20% to 50%	168.4	1,073.3	27.9	3.6	7.7	103.8	36.3
20% to 75%	165.4	863.4	22.7	4.0	7.8	84.0	29.4
Maximum	169.5	2,060.0	71.8	4.0	7.8	355.5	135.2

Notes:

- (1) Cold startup hourly mass emission rates (lb/hr) represent the worst 60 minute rolling period at reduced loads vendor performance data (NOx no control, CO and VOC partial control).

NOx (Cold SU) (0% to 20% load) = [17 min/event * 92.2 lb/hr + (60 - 17 min/event) * 152.5 lb/hr] * 1hr / 60 min = 135.1 lb/hr

NOx (Cold SU) (at 20% load) = 152.5 lb/hr

NOx (Cold SU) (20% to 40% load) = [14 min/event * 222.8 lb/hr + (60 - 14 min/event) * 152.5 lb/hr] * 1hr/60 min = 169.5 lb/hr

NOx (Cold SU) (20% to 50% load) = [14 min/event * 148.1 lb/hr + 14 min/event * 222.8 lb/hr + (60 - 14 min/event - 14 min/event) * 152.5 lb/hr] * 1hr/60 min = 168.4 lb/hr

NOx (Cold SU) (20% to 75% load) = [6 min/event * 123.1 lb/hr + 14 min/event * 148.1 lb/hr + 14 min/event * 222.8 lb/hr + (60 min/event - 6 min/event - 14 min/event - 14 min/event) * 152.5 lb/hr] * 1hr/60 min = 165.4 lb/hr

HOBBS CTG STARTUP & SHUTDOWN EMISSION RATE SUMMARY

WARM STARTUP

Air Pollutant	Units	75% CTG Load 584.5 F @ Catalyst		50% CTG Load 564 F @ Catalyst		40% CTG Load 531 F @ Catalyst		20% CTG Load 492.4 F @ Catalyst		0% CTG Load 435.4 F @ Catalyst	
		Pre Catalyst	Post Catalyst	Pre Catalyst	Post Catalyst	Pre Catalyst	Post Catalyst	Pre Catalyst	Post Catalyst	Pre Catalyst	Post Catalyst
NOx	ppmvd @ 15% O ₂	25.0	-	40.0	-	70.0	-	70.0	-	80.0	-
	lb/hr	123.1	-	148.1	-	222.8	-	152.5	-	92.2	-
CO	ppmvd @ 15% O ₂	10.0	1.8	15.0	1.9	120.0	15.2	2,500	322.5	2,500	340.0
	lb/hr	30.0	5.4	33.8	4.3	232.6	29.5	3,316	427.7	1,754	238.5
VOC	ppmvd @ 15% O ₂	2.0	0.7	2.5	0.9	7.8	2.7	196.0	68.6	750.0	300.0
	lb/hr	3.4	1.2	3.2	1.2	8.7	3.0	148.9	52.1	301.3	120.5

Notes:

- (1) During warm startup period the SCR will not be operational. The oxidation catalyst will retain partial oxidation capabilities through warm startup period.
- (2) As calculated in Reduced Load CTG Hourly

Ramp	WARM STARTUP						
	NOx (lb/hr)	CO (lb/hr)	VOC (lb/hr)	SO ₂ (lb/hr)	TSP/PM ₁₀ (lb/hr)	VOC (ppmvd)	
						Pre Catalyst	Post Catalyst
0% to 20%	129.8	356.6	77.8	2.4	7.6	404.2	155.6
at 20%	152.5	427.7	52.1	2.8	7.6	196.0	68.6
20% to 40%	164.4	360.1	43.8	3.1	7.6	164.1	57.4
20% to 50%	163.6	278.0	33.9	3.4	7.6	126.5	44.3
20% to 75%	160.0	226.8	3.4	3.9	7.8	9.8	3.4
Maximum	164.4	427.7	77.8	3.9	7.8	404.2	155.6

Notes:

(1) Warm startup hourly mass emission rates (lb/hr) represent the worst 60 minute rolling period at reduced loads vendor performance data (NOx no control, CO and VOC partial control).

NOx (Warm SU) (0% to 20% load) = [23 min/event * 92.2 lb/hr + (60 - 23 min/event) * 152.5 lb/hr] * 1hr / 60 min = 129.8 lb/hr

NOx (Warm SU) (at 20% load) = 152.5 lb/hr

NOx (Warm SU) (20% to 40% load) = [10 min/event * 222.8 lb/hr + (60 - 10 min/event) * 152.5 lb/hr] * 1hr/60 min = 164.4 lb/hr

NOx (Warm SU) (20% to 50% load) = [12 min/event * 148.1 lb/hr + 10 min/event * 222.8 lb/hr + (60 - 10 min/event - 12 min/event) * 152.5 lb/hr] * 1hr/60 min = 163.6 lb/hr

NOx (Warm SU) (20% to 75% load) = [7 min/event * 123.1 lb/hr + 12 min/event * 148.1 lb/hr + 10 min/event * 222.8 lb/hr + (60 min/event - 7 min/event - 12 min/event - 10 min/event) * 152.5 lb/hr] * 1hr/60 min = 160.0 lb/hr

HOBBS CTG STARTUP & SHUTDOWN EMISSION RATE SUMMARY

HOT STARTUP

Air Pollutant	Units	75% CTG Load 586 F @ Catalyst		50% CTG Load 581 F @ Catalyst		40% CTG Load 559 F @ Catalyst		20% CTG Load 522 F @ Catalyst		0% CTG Load 491 F @ Catalyst	
		Pre Catalyst	Post Catalyst	Pre Catalyst	Post Catalyst	Pre Catalyst	Post Catalyst	Pre Catalyst	Post Catalyst	Pre Catalyst	Post Catalyst
		NOx	ppmvd @ 15% O ₂	25.0	-	40.0	-	70.0	-	70.0	-
	lb/hr	123.1	-	148.1	-	222.8	-	152.5	-	92.2	-
CO	ppmvd @ 15% O ₂	10.0	1.8	15.0	1.8	120.0	14.9	2,500	315.0	2,500	322.5
	lb/hr	30.0	5.4	33.8	4.1	232.6	28.9	3,316	417.8	1,754	226.2
VOC	ppmvd @ 15% O ₂	2.0	0.7	2.5	0.9	7.8	2.7	196.0	68.6	750.0	300.0
	lb/hr	3.4	1.2	3.2	1.2	8.7	3.0	148.9	52.1	301.3	120.5

Notes:
 (1) During hot startup period the SCR will not be operational. The oxidation catalyst will retain partial oxidation capabilities throughout hot startup period.
 (2) As calculated in Reduced Load CTG Hourly

Ramp	HOT STARTUP						
	NOx (lb/hr)	CO (lb/hr)	VOC (lb/hr)	SO ₂ (lb/hr)	TSP/PM ₁₀ (lb/hr)	VOC (ppmvd)	
						Pre Catalyst	Post Catalyst
0% to 40%	157.6	140.4	61.0	2.8	7.6	368.6	146.8
20% to 75%	193.2	39.2	4.7	4.5	7.9	14.7	5.1
Maximum	193.2	140.4	61.0	4.5	7.9	368.6	146.8

Notes:
 (1) Hot startup hourly mass emission rates (lb/hr) represent the worst 60 minute rolling period at reduced loads vendor performance data (NOx no control, CO and VOC partial control).
 $NOx (Hot SU) (0\% \text{ to } 40\% \text{ load}) = [28 \text{ min/event} * 92.2 \text{ lb/hr} + 3 \text{ min/event} * 152.5 + (60 - 28 \text{ min/event}) * 222.8 \text{ lb/hr}] * 1 \text{ hr}/60 \text{ min} = 157.6 \text{ lb/hr}$
 $NOx (Hot SU) (40\% \text{ to } 75\% \text{ load}) = [3 \text{ min/event} * 152.5 \text{ lb/hr} + 39 \text{ min/event} * 222.8 + 11 \text{ min/event} * 148.1 + (60 - 3 \text{ min/event} - 39 \text{ min/event} - 11 \text{ min/event}) * 123.1 \text{ lb/hr}] * 1 \text{ hr}/60 \text{ min} = 193.2 \text{ lb/hr}$

SHUTDOWN

Air Pollutant	Units	75% CTG Load		50% CTG Load		40% CTG Load		20% CTG Load		0% CTG Load	
		Pre Catalyst	Post Catalyst	Pre Catalyst	Post Catalyst	Pre Catalyst	Post Catalyst	Pre Catalyst	Post Catalyst	Pre Catalyst	Post Catalyst
		NOx	ppmvd @ 15% O ₂	25.0	-	40.0	-	70.0	-	70.0	-
	lb/hr	123.1	-	148.1	-	222.8	-	152.5	-	92.2	-
CO	ppmvd @ 15% O ₂	10.0	1.7	15.0	1.7	120.0	13.9	2,500.0	285.0	2,500.0	285.0
	lb/hr	30.0	5.1	33.8	3.8	232.6	26.9	3,315.5	378.0	1,753.6	199.9
VOC	ppmvd @ 15% O ₂	2.0	0.6	2.5	0.8	7.8	2.3	196.0	58.8	750.0	225.0
	lb/hr	3.4	1.0	3.2	1.0	8.7	2.6	148.9	44.7	301.3	90.4

Notes:
 (1) During startup period the SCR will not be operational, while the oxidation catalyst will retain partial oxidation capabilities.
 (2) As calculated in Reduced Load CTG Hourly

STARTUP / SHUTDOWN

Air Pollutant	Units	75% CTG Load	50% CTG Load	40% CTG Load	20% CTG Load	0% CTG Load
SO ₂	lb/hr	6.3	4.8	4.1	2.8	1.5
TSP/PM ₁₀ /PM _{2.5}	lb/hr	9.3	7.7	7.7	7.6	7.5

Notes:
 (1) As calculated in Reduced Load CTG Hourly

HOBBS 501F4 Hourly GT Emission Rate Calculation (Reduced Load)

		75% CTG Load			50% CTG Load			40% CTG Load	20% CTG Load	1,800 rpm 0% CTG Load
SITE CONDITIONS										
Ambient Temperature	°F	30	45	95	30	45	95	30	30	30
Ambient Relative Humidity	%	70	60	20	70	60	20	70	70	70
Barometric Pressure	psia	12.83	12.83	12.83	12.83	12.83	12.83	12.83	12.83	12.83
FACILITY CONDITIONS										
GT Power Output	MW	125	119	98	83	79	65	66	32	-
Heat Rate	Btu/kWh	9,905	10,027	10,545	11,308	11,447	12,039	12,245	17,504	-
GT Model		Hobbs 501F4	Hobbs 501F4	Hobbs 501F4	Hobbs 501F4	Hobbs 501F4	Hobbs 501F4	Hobbs 501F4	Hobbs 501F4	Hobbs 501F4
GT Load	%	75	75	75	50	50	50	40	20	-
Temperature at Catalyst	°F	565	565	565	529	529	529	5	468	404
Chillers ON/OFF		Off	Off	Off	Off	Off	Off	Off	Off	Off
GT Heat Input	MMBtu/hr	1,235	1,190	1,033	933	899	780	804	555	301
GT Fuel Flow Rate	MMscf/hr	1.3	1.3	1.1	1.0	1.0	0.8	0.9	0.6	0.3
FUEL ANALYSIS										
Fuel Type		PNG	PNG	PNG	PNG	PNG	PNG	PNG	PNG	PNG
Fuel Molecular Weight	lb/lbmole	17.29	17.29	17.29	17.29	17.29	17.29	17.29	17.29	17.29
Sulfur Content	grains/100scf	1.7	1.7	1.7	1.7	1.7	1.7	1.7	1.7	1.7
Fuel Heat Content (LHV)	Btu/scf	932	932	932	932	932	932	932	932	932
Fuel Heat Content (HHV)	Btu/scf	1,033	1,033	1,033	1,033	1,033	1,033	1,033	1,033	1,033
HHV/LHV Ratio		1.1	1.1	1.1	1.1	1.1	1.1	1.1	1.1	1.1
GT EXHAUST GAS ANALYSIS										
Oxygen, O2	%vol	13.36	13.39	13.60	14.06	14.10	14.32	14.98	16.78	18.65
Carbon Dioxide, CO2	%vol	3.44	3.41	3.28	3.12	3.10	2.98	2.70	1.88	1.02
Water, H2O	%vol	7.13	7.28	7.54	6.51	6.65	6.88	5.70	4.09	2.43
Nitrogen, N2	%vol	75.13	74.97	74.64	75.36	75.20	74.87	75.67	76.30	76.93
Argon, Ar	%vol	0.94	0.93	0.93	0.94	0.93	0.93	0.95	0.96	0.97
Total	%vol	100	100	100	100	100	100	100	100	100
(1) Cold, warm and hot startup hourly mass emission rates (lb/hr) represent the worst 60 minute rolling period at reduced loads vendor performance data. Detailed calculations are provided below. Partial										
Rolling average period was used to identify worst case scenario and is not intended to be an operational restriction.										
(2) Emission factor (lb/event) represents the lb/lbmole										
		28.5	28.5	28.4	28.5	28.5	28.5	28.6	28.7	28.8
GT Exhaust Flow Rate	lb/hr	2,972,500	2,863,014	2,484,789	2,474,000	2,382,875	2,068,080	2,467,500	2,454,900	2,442,100
GT Exhaust Flow Rate	lbmole/hr	104,326	100,561	87,413	86,706	83,577	72,650	86,323	85,581	84,825
GT Exhaust Flow Rate	scf/hr	40,197,178	38,746,457	33,680,802	33,408,389	32,202,676	27,992,546	33,260,811	32,974,931	32,683,343
GT Exhaust Flow Rate	Nm3/hr	1,138,257	1,097,177	953,734	946,020	911,878	792,661	941,841	933,746	925,489
GT Exhaust Oxygen, O2	lbmole/hr	13,934	13,469	11,890	12,192	11,785	10,404	12,931	14,361	15,820
GT Exhaust Carbon Dioxide, CO2	lbmole/hr	3,586	3,426	2,864	2,710	2,588	2,163	2,332	1,606	866
GT Exhaust Water, H2O	lbmole/hr	7,441	7,323	6,588	5,644	5,554	4,997	4,917	3,502	2,060
GT Exhaust Nitrogen, N2	lbmole/hr	78,382	75,393	65,246	65,343	62,851	54,392	65,321	65,295	65,259
GT Exhaust Argon, Ar	lbmole/hr	982	939	815	817	781	678	822	817	819

HOBBS 501F4 Hourly GT Emission Rate Calculation (Reduced Load)

		75% CTG Load			50% CTG Load			40% CTG Load	20% CTG Load	1,800 rpm 0% CTG Load
GT EMISSIONS										
NOx (pre-SCR)	ppmvd @ 15% O2	25	25	25	40	40	40	70	70	80
NOx (pre-SCR)	ppmvd	27.6	27.4	26.2	39.7	39.3	37.4	59.5	40.4	24.2
NOx (pre-SCR as NO2)	lb/hr	123.1	117.3	97.5	148.1	141.0	116.5	222.8	152.5	92.2
CO (pre-Catalytic Oxidation)	ppmvd @ 15% O2	10	10	10	15	15	15	120	2,500	2,500
CO (pre-Catalytic Oxidation)	ppmvd	11	11	10	15	15	14	102	1,442	756
CO (pre-Catalytic Oxidation)	lb/hr	30	29	24	34	32	27	233	3,316	1,754
VOC (pre-Catalytic Oxidation)	ppmvd @ 15% O2	2.0	2.0	2.0	2.5	2.5	2.5	7.8	196	750
VOC (pre-Catalytic Oxidation)	ppmvd	2.2	2.2	2.1	2.5	2.5	2.3	6.6	113.1	226.9
VOC (pre-Catalytic Oxidation as CH4)	lb/hr	3.4	3.3	2.7	3.2	3.1	2.5	8.7	148.9	301.3
COLD STARTUP										
CO (post-Catalytic Oxidation)	ppmvd @ 15% O2	1.8	1.8	1.8	1.9	1.9	1.9	15.4	1,553.3	2,936.8
CO (post-Catalytic Oxidation)	ppmvd	2.0	2.0	1.9	1.9	1.9	1.8	13.1	896.0	888.6
CO (post-Catalytic Oxidation)	lb/hr	5.4	5.1	4.3	4.3	4.1	3.4	29.8	2,060.0	2,060.0
VOC (post-Catalytic Oxidation)	ppmvd @ 15% O2	0.7	0.7	0.7	0.9	0.9	0.9	2.7	68.6	300
VOC (post-Catalytic Oxidation)	ppmvd	0.8	0.8	0.7	0.9	0.9	0.8	2.3	39.6	90.8
VOC (post-Catalytic Oxidation as CH4)	lb/hr	1.2	1.1	1.0	1.2	1.1	0.9	3.0	52.1	120.5
WARM STARTUP										
CO (post-Catalytic Oxidation)	ppmvd @ 15% O2	1.8	1.8	1.8	1.9	1.9	1.9	15.2	322.5	340.0
CO (post-Catalytic Oxidation)	ppmvd	2.0	2.0	1.9	1.9	1.9	1.8	12.9	186.0	102.9
CO (post-Catalytic Oxidation)	lb/hr	5.4	5.1	4.3	4.3	4.1	3.4	29.5	427.7	238.5
VOC (post-Catalytic Oxidation)	ppmvd @ 15% O2	0.7	0.7	0.7	0.9	0.9	0.9	2.7	68.6	300
VOC (post-Catalytic Oxidation)	ppmvd	0.77	0.77	0.73	0.89	0.88	0.84	2.30	39.57	90.77
VOC (post-Catalytic Oxidation as CH4)	lb/hr	1.20	1.15	0.95	1.16	1.11	0.91	3.00	52.11	120.52
HOT STARTUP										
CO (post-Catalytic Oxidation)	ppmvd @ 15% O2	1.8	1.8	1.8	1.8	1.8	1.8	14.9	315.0	322.5
CO (post-Catalytic Oxidation)	ppmvd	2.0	2.0	1.9	1.8	1.8	1.7	12.7	181.7	97.6
CO (post-Catalytic Oxidation)	lb/hr	5.4	5.1	4.3	4.1	3.9	3.2	28.9	417.8	226.2
VOC (post-Catalytic Oxidation)	ppmvd @ 15% O2	0.7	0.7	0.7	0.9	0.9	0.9	2.7	68.6	300
VOC (post-Catalytic Oxidation)	ppmvd	0.77	0.77	0.73	0.89	0.88	0.84	2.30	39.57	90.77
VOC (post-Catalytic Oxidation as CH4)	lb/hr	1.20	1.15	0.95	1.16	1.11	0.91	3.00	52.11	120.52
SHUTDOWN										
CO (post-Catalytic Oxidation)	ppmvd @ 15% O2	1.7	1.7	1.7	1.7	1.7	1.7	13.9	285.0	285.0
CO (post-Catalytic Oxidation)	ppmvd	1.9	1.9	1.8	1.7	1.7	1.6	11.8	164.4	86.2
CO (post-Catalytic Oxidation)	lb/hr	5.1	4.9	4.0	3.8	3.6	3.0	26.9	378.0	199.9
VOC (post-Catalytic Oxidation)	ppmvd @ 15% O2	0.6	0.6	0.6	0.8	0.8	0.8	2.3	58.8	225
VOC (post-Catalytic Oxidation)	ppmvd	0.66	0.66	0.63	0.79	0.79	0.75	1.96	33.92	68.08
VOC (post-Catalytic Oxidation as CH4)	lb/hr	1.03	0.98	0.82	1.03	0.98	0.81	2.55	44.66	90.39
Sulfur Content	grains/100scf	1.7	1.7	1.7	1.7	1.7	1.7	1.7	1.7	1.7
SO2	lb/hr	6.32	6.09	5.28	4.77	4.60	3.99	4.12	2.84	1.54
PM10	mg/Nm3	3.70	3.70	3.70	3.70	3.70	3.70	3.70	3.70	3.70
PM10	lb/hr	9.28	8.95	7.78	7.72	7.44	6.47	7.68	7.62	7.55

HOBBS 501F4 Hourly GT Emission Rate Calculation (Reduced Load)

		75% CTG Load			50% CTG Load			40% CTG Load	20% CTG Load	1,800 rpm 0% CTG Load
CO2	lb/MMBtu (HHV)	118.8	118.8	118.8	118.8	118.8	118.8	118.8	118.8	118.8
N2O	lb/MMBtu (HHV)	2.2E-04	2.2E-04	2.2E-04	2.2E-04	2.2E-04	2.2E-04	2.2E-04	2.2E-04	2.2E-04
CH4	lb/MMBtu (HHV)	2.2E-03	2.2E-03	2.2E-03	2.2E-03	2.2E-03	2.2E-03	2.2E-03	2.2E-03	2.2E-03
Operating Hours at Each Load%	hr/yr	30	30	30	46	46	46	91	212	91
CO2	tpy	2,196	2,115	1,835	2,574	2,479	2,152	4,333	6,992	1,627
N2O	tpy	0.0041	0.0039	0.0034	0.0048	0.0046	0.0040	0.0080	0.013	0.0030
CH4	tpy	0.041	0.039	0.034	0.048	0.046	0.040	0.080	0.13	0.030
CO2 Global Warming Potential	-	1	1	1	1	1	1	1	1	1
N2O Global Warming Potential	-	298	298	298	298	298	298	298	298	298
CH4 Global Warming Potential	-	25	25	25	25	25	25	25	25	25
Total GHG	tpy	2,196	2,115	1,835	2,574	2,479	2,152	4,333	6,992	1,627
Total CO2e	tpy	2,198	2,117	1,837	2,577	2,482	2,154	4,337	6,999	1,628

[Vendor Data](#)

[Process Input Data](#)

Red and bolded text indicate information from actual emissions data. Please refer to the "Summary Graphs" tab.

Section 6.a

Green House Gas Emissions

(submitting under 20.2.70, 20.2.72 20.2.74 NMAC)

Title V (20.2.70 NMAC), NSR (20.2.72 NMAC), and PSD (20.2.74 NMAC) applicants must estimate and report green house gas (GHG) emissions to verify the emission rates reported in the public notice, determine applicability to 40 CFR 60 Subparts, and to complete Prevention of Significant Deterioration (PSD) applicability. GHG emissions are the sum of the aggregate group of six green house gases that include carbon dioxide (CO₂), nitrous oxide (N₂O), methane (CH₄), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF₆).

Calculating GHG Emissions:

1. Calculate mass GHG and CO₂e emissions from your source. Start up, shut down, and maintenance emissions must be included.
2. GHG mass emissions are the sum of the total annual tons of green house gases without adjusting with the global warming potentials (GWPs). CO₂e emissions are the sum of the mass emissions of each individual GHG multiplied by its GWP found in Table A-1 in 40 CFR 98 Mandatory Greenhouse Gas Reporting.
2. Report GHG mass and CO₂e emissions in Table 2-P of this application. Emissions are reported in **short** tons per year and represent each emission unit's Potential to Emit (PTE).

Sources for Calculating GHG Emissions:

- Manufacturer's Data
- AP-42 Compilation of Air Pollutant Emission Factors at <http://www.epa.gov/ttn/chief/ap42/index.html>
- EPA's Internet emission factor database WebFIRE at <http://cfpub.epa.gov/webfire/>
- 40 CFR 98 Mandatory Green House Gas Reporting except that tons should be reported in short tons rather than in metric tons for the purpose of PSD applicability.
- API Compendium of Greenhouse Gas Emissions Methodologies for the Oil and Natural Gas Industry. August 2009 or most recent version.
- Sources listed on EPA's NSR Resources for Estimating GHG Emissions at <http://www.epa.gov/nsr/clean-air-act-permitting-greenhouse-gases>:

Global Warming Potentials (GWP):

Applicants must use the Global Warming Potentials codified in Table A-1 of the most recent version of 40 CFR 98 Mandatory Greenhouse Gas Reporting. The GWP for a particular GHG is the ratio of heat trapped by one unit mass of the GHG to that of one unit mass of CO₂ over a specified time period.

"Greenhouse gas" for the purpose of this part is defined as the aggregate group of the following six gases: carbon dioxide, nitrous oxide, methane, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. (20.2.70.7.O NMAC, 20.2.74.7.Y NMAC). You may also find GHGs defined in 40 CFR 86.1818-12(a).

Metric to Short Ton Conversion:

Short tons for GHGs and other regulated pollutants are the standard unit of measure for PSD and title V permitting programs. 40 CFR 98 Mandatory Greenhouse Reporting requires metric tons.

1 metric ton = 1.10231 short tons (per Table A-2 to Subpart A of Part 98 – Units of Measure Conversions)

There are no changes in representation related to GHG emissions for this revision application. All emissions are reported on Table 2-P of the UA 2 Form.

Section 7

Information Used To Determine Emissions

Information Used to Determine Emissions shall include the following:

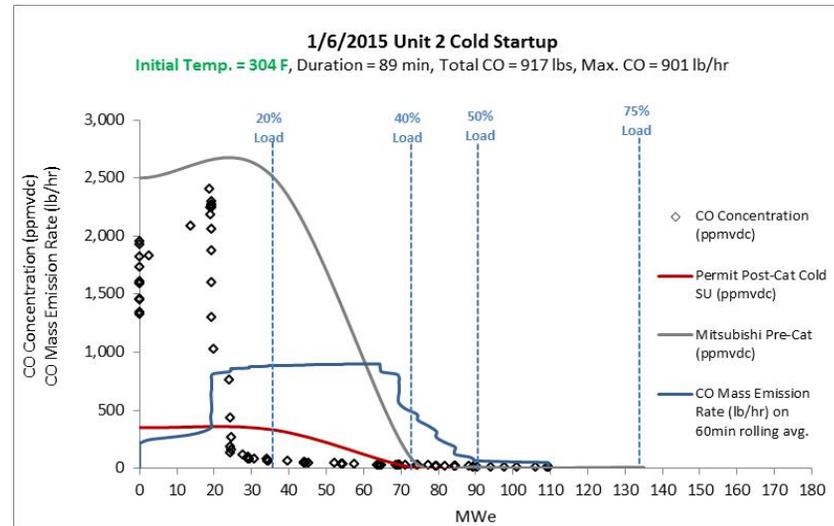
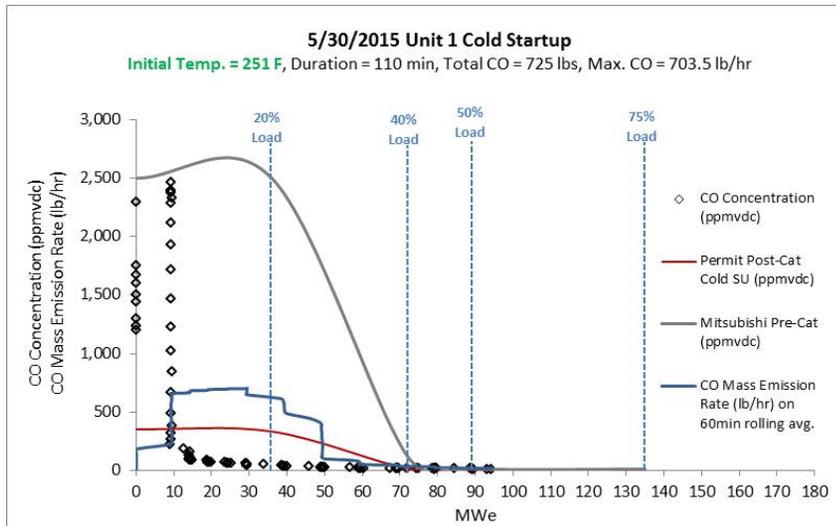
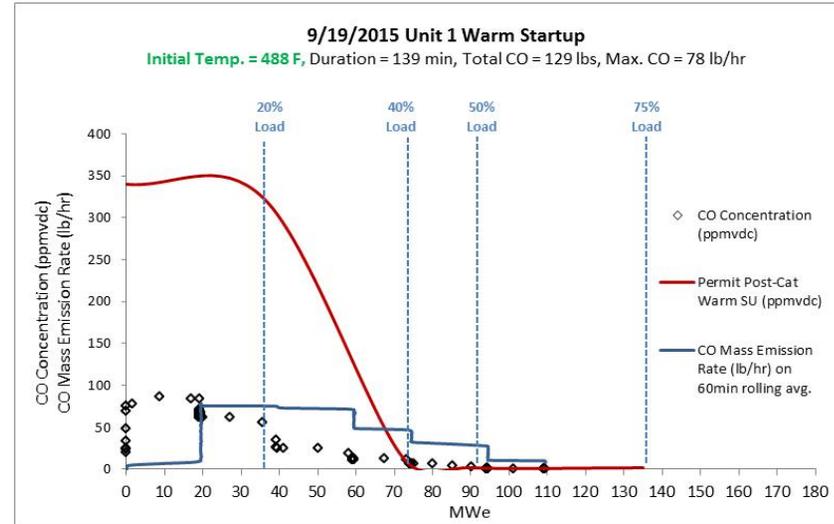
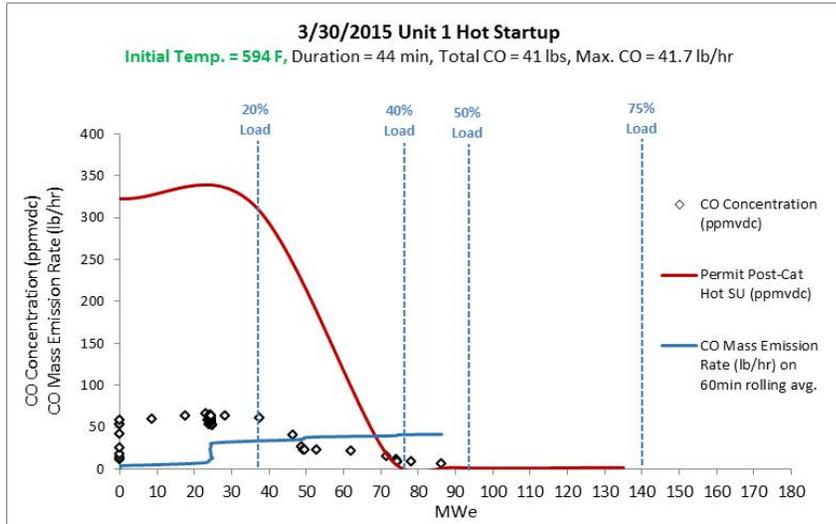
- If manufacturer data are used, include specifications for emissions units and control equipment, including control efficiencies specifications and sufficient engineering data for verification of control equipment operation, including design drawings, test reports, and design parameters that affect 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.
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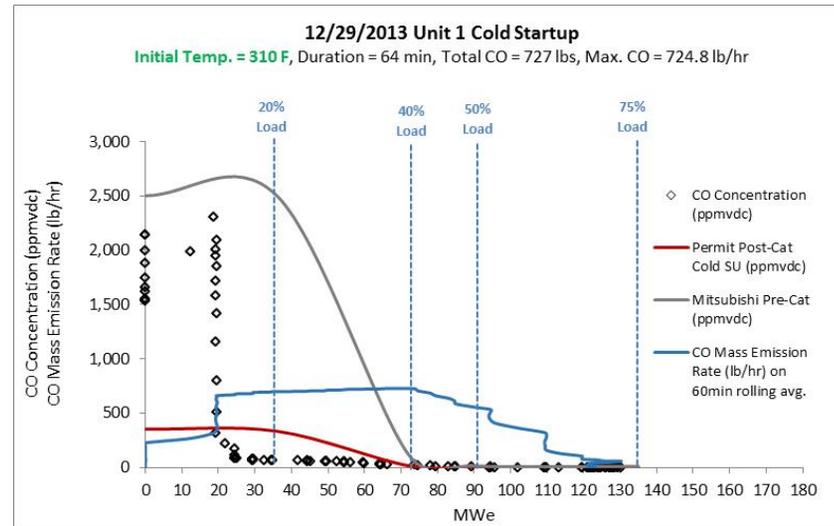
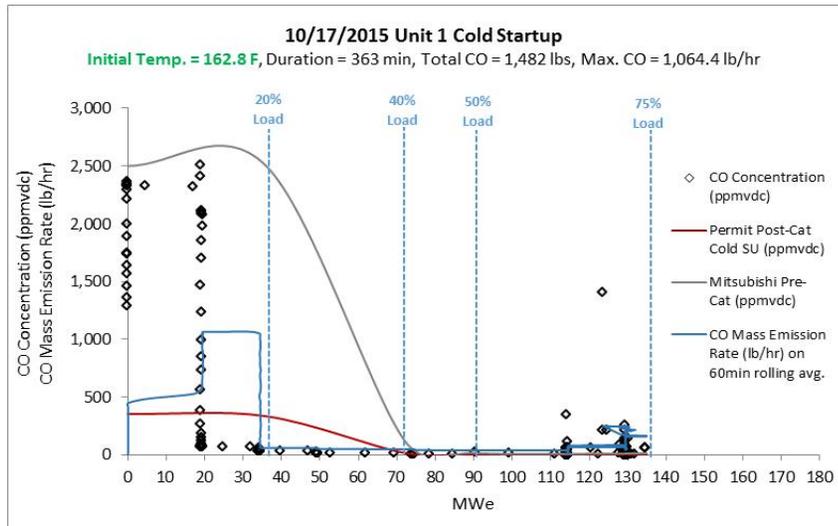
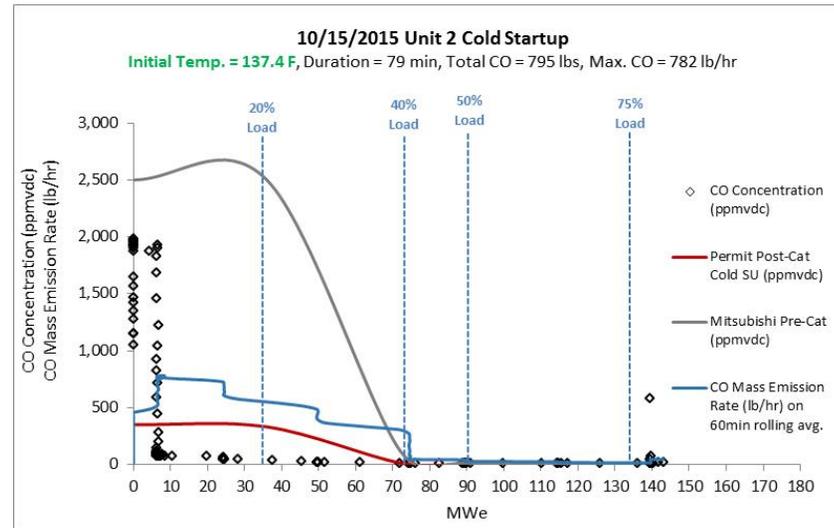
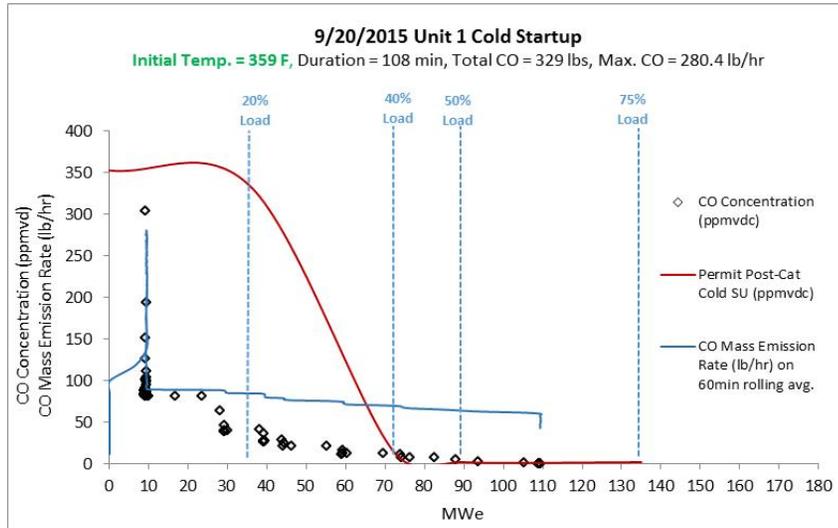
This permit application is being submitted to request an increase in the hourly SSM mass emission rate limit for CO to 2,060 lb/hr from each unit (HOBB-1 and HOBB-2). Actual operational data for calendar years 2013 through 2015 was used to calculate the proposed mass emission rate. Uncontrolled emission rates were compared to vendor-supplied data. The detailed emission rate calculations are provided in Section 6 and the UA2 workbook. Raw operational data is provided in this Section.

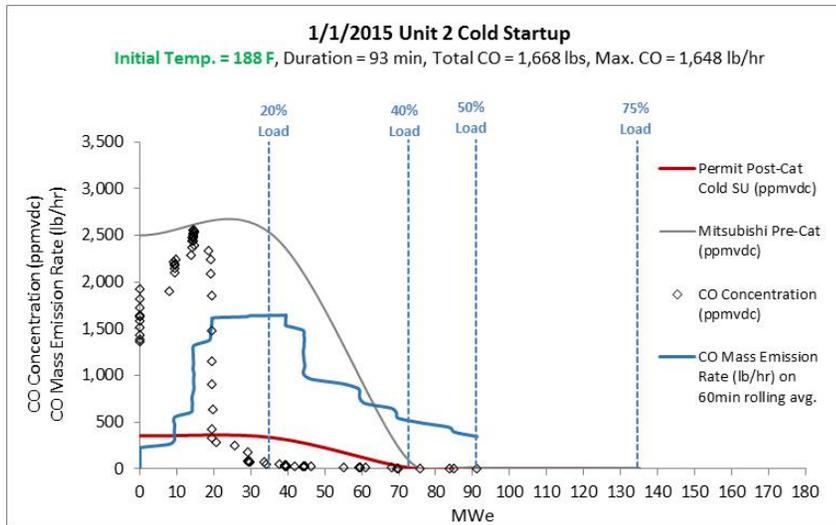
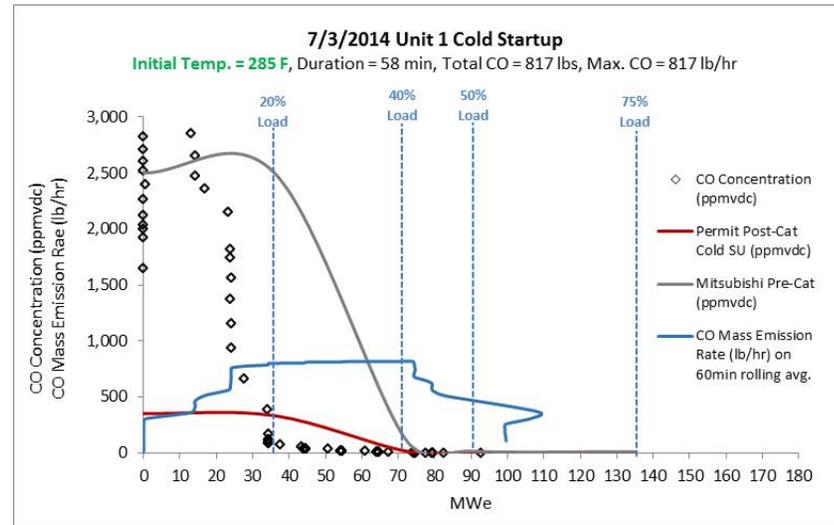
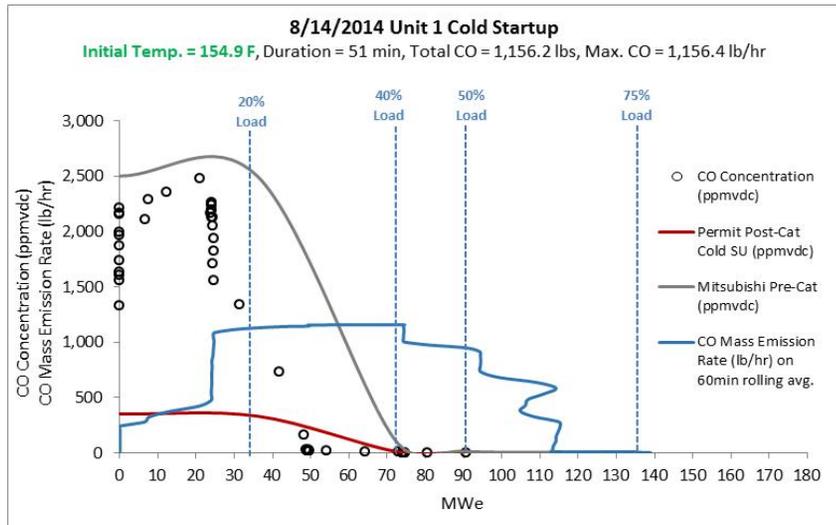
HOBBS 2013 - 2015 STARTUP ACTUAL DATA

Calendar Year	Startup Data	Event Duration (minutes)	Total Event CO Emissions (lb/event)*	CO Max. 60-min Rolling Avg. Emissions (lb/hr)
2013	Unit 1 Max.	243	727	725
	Unit 2 Max.	160	1,164	1,036
	Max. Both Units	243	1,164	1,036
2014	Unit 1 Max.	437	1,692	1,250
	Unit 2 Max.	364	1,187	1,087
	Max. Both Units	437	1,692	1,250
2015	Unit 1 Max.	363	1,482	1,259
	Unit 2 Max.	250	1,668	1,648
	Max. Both Units	363	1,668	1,648
2013-2015	Unit 1 Max.	437	1,692	1,259
	Unit 2 Max.	364	1,668	1,648
	Max. Both Units	437	1,692	1,648
Current Permit Representation		180	1,723	441
Proposed limit				2,060

*lb/event representation is on an annual average basis for the purpose of calculating annual MSS emissions and does not represent a discrete limit.







Summary Data Report Startup Data 2015

Facility Name: Hobbs Generating Station
Location: Hobbs, New Mexico

2015 Startup Data	Event Duration (minutes)	Total Event CO Emissions (lb/event)	CO Max. 60-min Rolling Avg. Emissions (lb/hr)
Unit 1 Max.	363	1,482	1,259
Unit 2 Max.	250	1,668	1,648
Max. Both Units	363	1,668	1,648

* Unit 2 event on 1/15 driving the maximum emissions may need to be evaluated to confirm data is valid

Unit	Date Start Time	Date End Time	Event Duration (minutes)	Total Event CO Emissions (lb/event)	CO Max. 60-min Rolling Avg. Emissions (lb/hr)	Catalyst Temperature (Degrees Fahrenheit)			Load (MWe)		Comments
						Start Event	End Event	Max. in Event	Start Event	End Event	
1	01/03/2015 14:16	01/03/2015 15:48	92	134	107.0	415	585	585	0	95	Warm startup. CO catalyst achieves expected oxidation levels within 92 minutes of startup.
1	01/10/2015 11:01	01/10/2015 12:00	59	1,259	1,259	231	522	522	0	39	Cold Startup. Data provided does not show the unit was capable of reaching the authorized CO emission limits on a minute basis. Load < 40 MWe for the data provided. From 11:01 to 11:37 catalyst temperature < 410 F and the CO emissions averaged 1,987.7 lb/hr with a maximum reading of 3,2017.8 lb/hr. From 11:38 to 12:00 catalyst temperature increased up to 522.4 F with CO emission rates > 8.8 lb/hr authorized limit.
1	03/30/2015 13:00	03/30/2015 13:44	44	41	41.7	594	524	601	0	86	Hot startup. CO catalyst achieves expected oxidation levels within 59 minutes of startup.
1	05/21/2015 16:03	05/21/2015 17:14	71	55	52.4	491	527	528	0	84	Warm Startup. CO catalyst achieves expected oxidation levels within 71 minutes of startup.
1	05/30/2015 15:45	05/30/2015 17:35	110	725	703.5	252	528	530	0	79	Cold Startup. Unit reaches 8.8 lb/hr authorized limit on a minute basis. CO emission rate after 17:35 fluctuates but remains < 8.8 lb/hr on a minute basis except at 17:46 = 9.3 lb/hr and 17:47 = 9.5 lb/hr. These fluctuations have been ignored in the calculations.
1	06/26/2015 11:06	06/26/2015 11:51	45	34	34.8	457	515	519	0	74	Warm startup. CO catalyst achieves expected oxidation levels within 45 minutes of startup.
1	09/18/2015 19:03	09/18/2015 20:54	111	799	768.8	222	522	531	0	60	Cold Startup. Unit reaches 8.8 lb/hr authorized limit on a minute basis at 20:54 but fuel flow is stopped at 20:55
1	09/18/2015 23:47	09/19/2015 00:35	48	36	36.7	510	528	535	0	84	Hot startup. CO catalyst achieves expected oxidation levels within 48 minutes of startup.
1	09/19/2015 16:07	09/19/2015 18:26	139	129	78.8	488	605	605	0	86	Warm startup. CO catalyst achieves expected oxidation levels within 139 minutes of startup.
1	09/20/2015 18:57	09/20/2015 20:45	108	329	280.4	359	538	538	0	88	Cold Startup. Unit reaches 8.8 lb/hr authorized limit on a minute basis at 20:45.
1	10/17/2015 10:10	10/17/2015 16:13	363	1,482	1,064	163	638	649	0	115	Cold Startup. CO emission rates continue to decrease from startup at 10:10 and as catalyst temperature increases from 163 F up until 584.4F (13:16), reaching authorized emission limit on a minute basis at 12:16. However, at 13:17 CO emission rate readings start to fluctuate, reaching a maximum minute reading of 4,379 lb/hr. Summarized data accounts for all fluctuations.

Unit	Date Start Time	Date End Time	Event Duration (minutes)	Total Event CO Emissions (lb/event)	CO Max. 60-min Rolling Avg. Emissions (lb/hr)	Catalyst Temperature (Degrees Fahrenheit)			Load (MWe)		Comments
						Start Event	End Event	Max. in Event	Start Event	End Event	
1	12/06/2015 16:19	12/06/2015 19:54	215	1,028	845.6	200	493	513	0	0	Cold Startup. Unit reaches does not reach 8.8 lb/hr authorized limit. Fuel flow is stopped.
1	12/08/2015 10:08	12/08/2015 12:24	136	1,077	612.8	302	581	581	0	150	Cold Startup. CO readings are inconsistent with catalyst temperature increase.
2	01/01/2015 15:27	01/01/2015 17:00	93	1,668	1,648	188	590	590	0	91	Cold Startup. Data provided does not show the unit was capable of reaching the authorized CO emission limits on a minute basis.
2	01/06/2015 22:11	01/06/2015 23:40	89	917	901	304	586	586	0	98	Cold Startup. Unit reaches 8.8 lb/hr authorized limit on a minute basis at 23:40.
2	02/25/2015 18:15	02/25/2015 19:13	58	33	34	582	579	617	0	88	Hot startup. CO catalyst achieves expected oxidation levels within 58 min of startup.
2	05/18/2015 01:16	05/18/2015 03:38	142	473	393	307	549	549	0	115	Cold Startup. Unit reaches 8.8 lb/hr authorized limit on a minute basis at 03:07 (111 min since startup), with catalyst temperature reading of 505.5 F, and an output of 79.4MW. However, at 03:16 there is a peak on the CO lb/hr and high fluctuations occurred between 03:16 and 03:38. These fluctuations are inconsistent with catalyst temperature that continue to increase from 505.5 to 549.8 and fuel flow that remains fairly constant with a slight increase. At 03:39 CO readings go back to 5.9 lb/hr, catalyst temperature is marked at 549.8 F the unit output is 114.6 MW.
2	08/30/2015 12:17	08/30/2015 12:52	35	22	23	481	516	516	0	74	Warm startup. CO catalyst achieves expected oxidation levels within 35 minutes of startup.
2	09/20/2015 21:52	09/21/2015 02:02	250	666	541	252	591	600	0	78	Cold Startup. CO catalyst requires a significant amount of time to reach expected oxidation levels. There appear to be some odd readings from 23:52 to 00:18. Unit is hold at very low loads for an extended period of time.
2	10/15/2015 12:50	10/15/2015 14:09	79	795	782	137	545	545	0	72	Cold Startup. Unit reaches 8.8 lb/hr authorized limit on a minute basis at 14:09. However, from 14:50 to 15:00 CO readings fluctuate above the authorized limit. This is inconsistent with catalyst temperature and unit load which is reached 143 MW. Data from 14:50 to 15:00 is not included in the analysis. Additional data beyond 15:00 would be necessary to determine if the CO catalyst performed.
2	10/17/2015 13:16	10/17/2015 15:38	142	1,010	898	183	634	634	0	130	Cold Startup. CO readings decrease as load and temperature increase. At 15:09 readings start fluctuating with some possible misreadings.

Notes:

(1) Event end time defined as the time when the unit is capable of reaching CO Emission Rate < 8.8 lb/hr (authorized normal operation limit)

(2) For detailed calculations and raw data, please refer to "2016-02-18 Hobbs CO SSM Events.xlsx"

Summary Data Report

Startup Data 2014

Facility Name: Hobbs Generating Station

Location: Hobbs, New Mexico

2014 Startup Data	Event Duration (minutes)	Total Event CO Emissions (lb/event)	CO Max. 60-min Rolling Avg. Emissions (lb/hr)
Unit 1 Max.	437	1,692	1,250
Unit 2 Max.	364	1,187	1,087
Max. Both Units	437	1,692	1,250

Unit	Date Start Time	Date End Time	Event Duration (minutes)	Total Event CO Emissions (lb/event)	CO Max. 60-min Rolling Avg. Emissions (lb/hr)	Catalyst Temperature (Degrees Fahrenheit)			Load (MWe)		Comments
						Start Event	End Event	Max. in Event	Start Event	End Event	
1	01/02/2014 09:29	01/02/2014 10:37	68	86	83.5	450	518	533	0	83	
1	01/14/2014 03:53	01/14/2014 05:29	96	103	72.2	490	568	568	0	140	
1	01/21/2014 01:43	01/21/2014 02:49	66	326	322.4	345	520	534	0	84	
1	01/26/2014 06:27	01/26/2014 07:09	42	40	39.8	488	516	525	0	78	
1	03/01/2014 21:58	03/01/2014 23:44	106	222	201.8	70	589	595	0	78	calculations rely on some data marked as invalid
1	03/02/2014 07:52	03/02/2014 09:45	113	151	100.4	552	532	578	0	91	
1	03/20/2014 02:33	03/20/2014 03:23	50	66	67.1	560	522	560	0	83	
1	04/21/2014 01:08	04/21/2014 01:43	35	39	38.5	553	532	554	0	69	
1	05/10/2014 22:33	05/10/2014 23:00	27	21	21.4	591	542	592	0	50	dataset never reaches <8.8 lb CO/hr on minute basis
1	05/14/2014 11:21	05/14/2014 11:57	36	40	39.7	501	523	528	0	71	
1	05/18/2014 08:46	05/18/2014 09:22	36	35	35.0	454	514	514	0	51	
1	05/25/2014 06:00	05/25/2014 06:48	48	52	53.5	488	523	528	0	74	dataset starts with gas already flowing; calculations rely on some data marked as invalid
1	06/01/2014 04:55	06/01/2014 05:41	46	52	52.7	530	508	532	0	78	calculations rely on some data marked as invalid
1	06/14/2014 07:43	06/14/2014 08:32	49	50	51.1	497	525	530	0	64	
1	06/22/2014 18:11	06/22/2014 18:50	39	34	34.9	551	537	552	0	69	
1	06/25/2014 02:56	06/25/2014 03:40	44	58	58.2	532	523	532	0	72	
1	06/28/2014 05:00	06/28/2014 05:38	38	58	59.5	533	524	533	0	73	dataset starts with gas already flowing; calculations rely on some data marked as invalid
1	06/29/2014 04:57	06/29/2014 05:44	47	55	55.6	526	506	526	0	74	
1	07/02/2014 03:53	07/02/2014 04:42	49	35	38.8	520	515	525	0	72	
1	07/03/2014 18:41	07/03/2014 19:39	58	817	817.0	285	514	514	0	67	Cold Startup. Unit reaches 8.8 lb/hr authorized limit on a minute basis at 19:39. During the first minutes of the events Mitsubishi pre-catalyst design concentration is exceeded.
1	07/05/2014 06:40	07/05/2014 07:42	62	73	72.4	485	516	527	0	69	
1	07/06/2014 06:00	07/06/2014 06:36	36	37	38.0	522	514	522	0	73	
1	07/07/2014 04:00	07/07/2014 04:49	49	55	60.3	514	523	525	0	69	
1	07/08/2014 03:55	07/08/2014 04:47	52	49	53.9	521	519	521	0	74	

Unit	Date Start Time	Date End Time	Event Duration (minutes)	Total Event CO Emissions (lb/event)	CO Max. 60-min Rolling Avg. Emissions (lb/hr)	Catalyst Temperature (Degrees Fahrenheit)			Load (MWe)		Comments
						Start Event	End Event	Max. in Event	Start Event	End Event	
1	07/18/2014 03:55	07/18/2014 05:29	94	139	104.2	511	549	549	0	118	
1	07/20/2014 05:00	07/20/2014 05:45	45	46	47.0	505	524	524	0	69	dataset starts with gas already flowing
1	07/31/2014 05:02	07/31/2014 05:51	49	45	45.5	506	526	530	0	69	calculations rely on some data marked as invalid
1	08/07/2014 16:28	08/07/2014 17:12	44	38	38.4	547	558	573	0	64	
1	08/12/2014 16:25	08/12/2014 17:13	48	36	36.5	504	609	609	0	72	
1	08/14/2014 21:15	08/14/2014 22:06	51	1,156.2	1,156.4	155	471	471	0	73	
1	08/31/2014 04:46	08/31/2014 05:33	47	53	53.7	526	525	537	0	78	
1	09/06/2014 05:05	09/06/2014 07:35	150	111	67.8	520	576	577	0	124	
1	09/08/2014 03:50	09/08/2014 08:00	250	247	83.1	520	638	659	0	77	
1	09/08/2014 10:00	09/08/2014 11:14	74	55	49.9	555	535	566	0	69	
1	09/08/2014 19:01	09/08/2014 19:37	36	32	33.3	491	531	532	0	72	
1	11/30/2014 18:35	12/01/2014 01:52	437	1,692	1,249.8	84	535	546	0	139	Raw data marked as invalid
1	12/02/2014 11:51	12/02/2014 15:58	247	452	259.3	177	533	579	0	162	
1	12/27/2014 04:59	12/27/2014 07:08	129	211	177.0	211	586	586	0	42	
1	12/28/2014 10:26	12/28/2014 11:19	53	723	723.8	294	537	537	0	89	
1	12/28/2014 16:04	12/28/2014 16:43	39	38	37.7	554	579	579	0	102	
2	02/21/2014 06:48	02/21/2014 08:59	131	209	147.1	123	523	541	0	59	Cold Startup. Concentration data fluctuates from 6:57 to 7:38 - possibly due to calibration error, as the original data is marked in red.
2	03/02/2014 00:06	03/02/2014 00:42	36	45	127.1	376	489	489	0	79	Unit is started up and shut down from 22:03 to 22:14 - very quick, so ignored in the overall calculations.
2	03/08/2014 04:42	03/08/2014 06:28	106	172	154.4	364	526	526	0	83	Fluctuates and reads as zero briefly in the middle of the startup - likely due to calibration error.
2	03/11/2014 03:55	03/11/2014 04:39	44	21	27.5	466	520	520	0	74	Concentration spike at 5:00 ignored - calibration error
2	03/14/2014 02:43	03/14/2014 04:03	80	46	41.6	506	523	523	0	84	Concentration spike at 5:00 ignored - calibration error
2	03/16/2014 08:40	03/16/2014 11:00	140	678	603.0	324	524	524	0	85	dataset never reaches <8.8 lb CO/hr on minute basis
2	03/18/2014 09:42	03/18/2014 10:52	70	42	40.1	407	519	519	0	58	
2	04/12/2014 11:34	04/12/2014 12:06	32	15	16.1	551	591	591	0	49	
2	06/09/2014 03:59	06/09/2014 04:42	43	28	33.5	510	513	513	0	77	Concentration spike at 5:00 ignored - calibration error
2	08/07/2014 15:22	08/07/2014 17:00	98	34	28.1	481	539	618	0	59	Data dips slightly above and under limit from 16:09 to 17:00, but never stays consistently below 8.8 lbs/hr
2	08/12/2014 11:55	08/12/2014 17:00	305	192	41.8	534	590	633	0	50	dataset never reaches <8.8 lb CO/hr on minute basis
2	08/16/2014 18:21	08/16/2014 19:30	69	312	310.5	332	516	516	0	56	
2	09/10/2014 14:46	09/10/2014 15:32	46	316	319.1	308	512	512	0	44	
2	09/15/2014 06:42	09/15/2014 08:00	78	387	381.9	331	516	517	0	51	dataset never reaches <8.8 lb CO/hr on minute basis
2	09/19/2014 05:42	09/19/2014 06:30	48	27	60.1	464	518	518	0	69	Concentration spikes from 7:42 to 8:00 ignored - calibration error
2	12/11/2014 18:56	12/12/2014 01:00	364	1,151	854.2	184	527	527	0	83	data never reaches <8.8 lb CO/hr on minute basis
2	12/27/2014 12:46	12/27/2014 15:00	134	1,187	1,087.3	96	457	457	0	0	Unit does not produce power
2	12/27/2014 22:48	12/28/2014 01:00	132	283	191.5	386	549	549	0	84	data never reaches <8.8 lb CO/hr on minute basis
2	12/31/2014 10:53	12/31/2014 12:28	95	685	668.0	368	548	574	0	106	Sudden concentration spike from 12:53 to 12:55 ignored - calibration error

Notes:

- (1) Event end time defined as the time when the unit is capable of reaching CO Emission Rate < 8.8 lb/hr (authorized normal operation limit)
(2) For detailed calculations and raw data, please refer to "2016-02-18 Hobbs CO SSM Events.xlsx"

Summary Data Report

Startup Data 2013

Facility Name: Hobbs Generating Station
Location: Hobbs, New Mexico

2013 Startup Data	Event Duration (minutes)	Total Event CO Emissions (lb/event)	CO Max. 60-min Rolling Avg. Emissions (lb/hr)
Unit 1 Max.	243	727	725
Unit 2 Max.	160	1,164	1,036
Max. Both Units	243	1,164	1,036

Unit	Date Start Time	Date End Time	Event Duration (minutes)	Total Event CO Emissions (lb/event)	CO Max. 60-min Rolling Avg. Emissions (lb/hr)	Catalyst Temperature (Degrees Fahrenheit)			Load (MWe)		Comments
						Start Event	End Event	Max. in Event	Start Event	End Event	
1	11/25/2013 11:42	11/25/2013 12:39	57	81	80.8	463	530	541	0	87	Warm Startup. CO catalyst achieves expected oxidation levels within 57 minutes of startup.
1	11/27/2013 03:57	11/27/2013 04:18	21	15	15.0	498	517	517	0	0	Hot Startup followed by Shutdown. Unit was not able to operate. Fuel flow started at 03:57 and dropped at 04:18.
1	11/27/2013 07:20	11/27/2013 11:23	243	330	111.3	430	523	598	0	83	Warm Startup. Event duration is three times more than the largest of all other warm startups. CO readings were inconsistent from 09:20 to 09:46. If data points from 09:20 to 09:46 are not considered, then the Total Event CO Emissions = 283.8 lb/event and the Max. 60-min Rolling Avg. CO Emissions = 100.8 lb/hr
1	12/02/2013 03:28	12/02/2013 04:46	78	104	89.6	390	565	574	0	74	Warm Startup. CO catalyst achieves expected oxidation levels within 78 min of startup. At 5:00 CO readings appear invalid and have been disregarded. At 04:59 --> 84.5 MWe; 17,393.1 scfm; 0.7 lbCO/hr and 0.3 ppmvdc CO. These data is consistent since 04:46. At 05:00 --> 84.5 MWe; 17,407.6 scfm; 192.2 lbCO/hr and 78.1 ppmvdc CO. To understand if this was a single incorrect reading or the unit was malfunctioning additional data past 5:00 is necessary.
1	12/02/2013 08:09	12/02/2013 08:50	41	32	32.7	507	534	534	0	74	Hot Startup. CO catalyst achieves expected oxidation levels within 41 minutes of startup.
1	12/29/2013 06:00	12/29/2013 07:04	64	727	724.8	311	525	533	0	83	Cold Startup.
1	12/31/2013 07:10	12/31/2013 08:08	58	71	71.2	480	514	542	0	84	Hot Startup. CO catalyst achieves expected oxidation levels within 58 minutes of startup.
2	10/13/2013 08:50	10/13/2013 11:30	160	1,164	1,036.0	89	453	471	0	61	Cold Startup. Spike in gas flow at 8:21 is ignored. Event start considered at 8:50
2	11/25/2013 12:47	11/25/2013 13:44	57	39	38.9	510	534	542	0	85	

Notes:

- (1) Event end time defined as the time when the unit is capable of reaching CO Emission Rate < 8.8 lb/hr (authorized normal operation limit)
- (2) For detailed calculations and raw data, please refer to "2016-02-18 Hobbs CO SSM Events.xlsx"

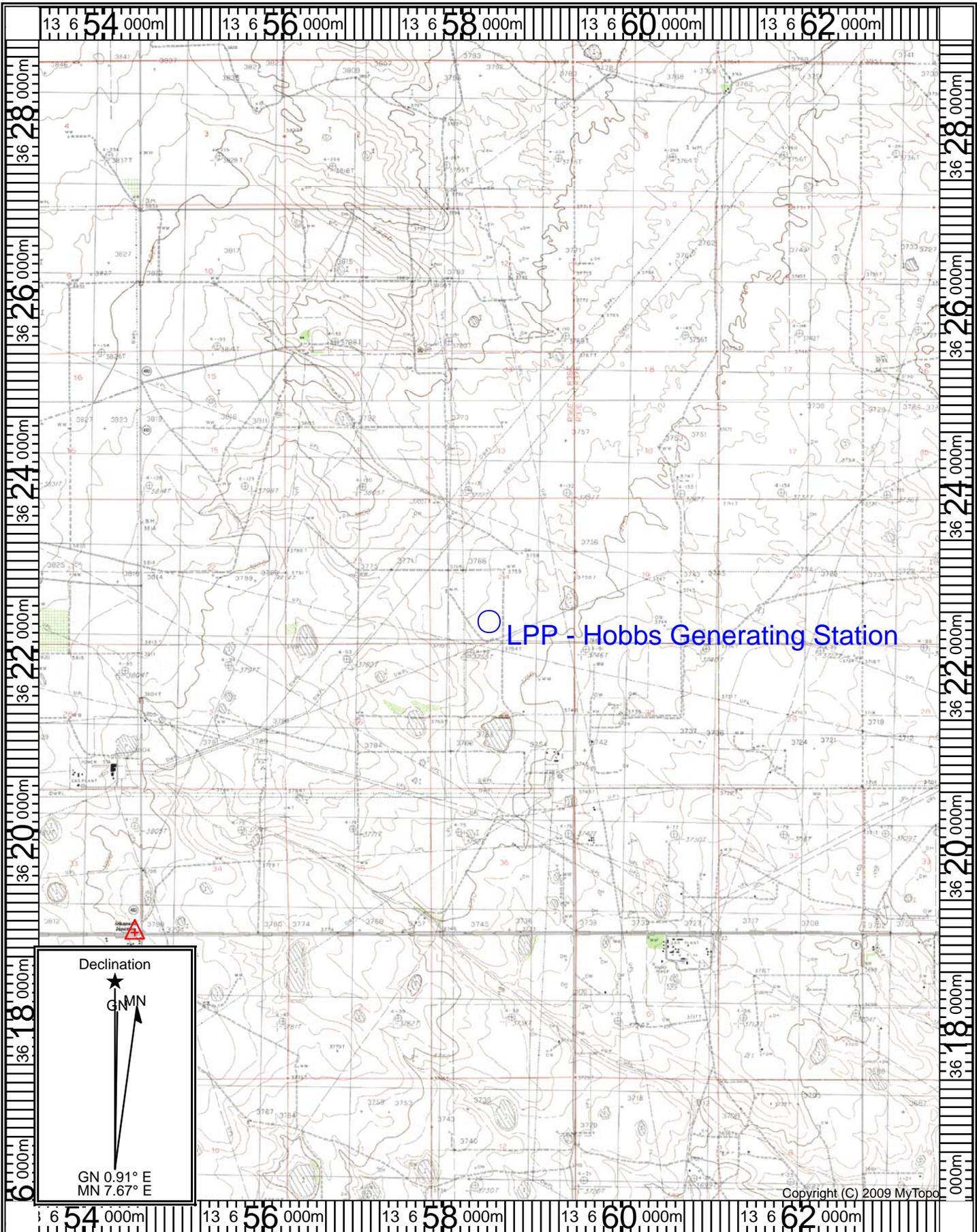
Section 8

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	

[An area map of the facility is attached.](#)



LPP - Hobbs Generating Station



Copyright (C) 2009 MyTopo

Map Name: MONUMENT NORTH
Print Date: 03/06/12

Scale: 1 inch = 4,761 ft.
Map Center: 13 0658413 E 3622424 N

Horizontal Datum: WGS84

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.

Proof of public notice is included in the following pages.

Delivery Confirmations of Certified Letters

City of Hobbs

USPS.com® - USPS Tracking® https://tools.usps.com/go/TrackConfirmAction.action?trRef=fullpage&tl...

English Customer Service USPS Mobile Register / Sign In

USPS.COM

USPS Tracking®

Tracking Number: 70151520000251143454

On Time
Expected Delivery Day: Monday, February 29, 2016

Product & Tracking Information

Postal Product: First-Class Mail®
Features: Certified Mail™ Return Receipt
See tracking for related item: 9590540101675234762918

DATE & TIME	STATUS OF ITEM	LOCATION
February 29, 2016, 11:58 am	Delivered	HOBBS, NM 88240
Your item was delivered at 11:58 am on February 29, 2016 in HOBBS, NM 88240.		
February 29, 2016, 6:26 am	Arrived at Unit	HOBBS, NM 88240
February 28, 2016, 4:32 pm	Departed USPS Destination Facility	LUBBOCK, TX 79402
February 28, 2016, 12:45 am	Arrived at USPS Destination Facility	LUBBOCK, TX 79402
February 26, 2016, 11:34 pm	Departed USPS Origin Facility	NORTH HOUSTON, TX 77315
February 26, 2016, 10:01 pm	Arrived at USPS Origin Facility	NORTH HOUSTON, TX 77315
February 26, 2016, 6:14 pm	Departed Post Office	HOUSTON, TX 77058
February 26, 2016, 2:28 pm	Acceptance	HOUSTON, TX 77058

Available Actions

[Text Updates](#)

[Email Updates](#)

[Customer Service](#) Have questions? We're here to help.

[Get Easy Tracking Updates](#) Sign up for My USPS.

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY																
<ul style="list-style-type: none"> ■ Complete items 1, 2, and 3. ■ Print your name and address on the reverse so that we can return the card to you. ■ Attach this card to the back of the mailpiece, or on the front if space permits. <p>1. Article Addressed to:</p> <p style="font-size: 1.2em; margin-left: 20px;">Ms. Ann Betzen Risk Manager, City of Hobbs 200 E Broadway Hobbs, NM 88240</p> <div style="text-align: center; margin-top: 10px;">  9590 9401 0167 5234 7629 18 </div> <p>2. Article Number (Transfer from service label)</p> <p style="font-size: 1.2em; margin-left: 20px;">7015 1520 0002 5114 3454</p>	<p>A. Signature</p> <p style="font-size: 1.5em; margin-left: 20px;"><i>[Handwritten Signature]</i></p> <p style="text-align: right;"><input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) C. Date of Delivery</p> <p style="font-size: 1.2em; margin-left: 20px;">April Avril 1A2-29-16</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>																
<p>3. Service Type</p> <table style="width: 100%; font-size: 0.9em;"> <tr> <td><input type="checkbox"/> Adult Signature</td> <td><input type="checkbox"/> Priority Mail Express®</td> </tr> <tr> <td><input type="checkbox"/> Adult Signature Restricted Delivery</td> <td><input type="checkbox"/> Registered Mail™</td> </tr> <tr> <td><input checked="" type="checkbox"/> Certified Mail®</td> <td><input type="checkbox"/> Registered Mail Restricted Delivery</td> </tr> <tr> <td><input type="checkbox"/> Certified Mail Restricted Delivery</td> <td><input type="checkbox"/> Return Receipt for Merchandise</td> </tr> <tr> <td><input type="checkbox"/> Collect on Delivery</td> <td><input type="checkbox"/> Signature Confirmation™</td> </tr> <tr> <td><input type="checkbox"/> Collect on Delivery Restricted Delivery</td> <td><input type="checkbox"/> Signature Confirmation Restricted Delivery</td> </tr> <tr> <td><input type="checkbox"/> Insured Mail</td> <td></td> </tr> <tr> <td><input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)</td> <td></td> </tr> </table>		<input type="checkbox"/> Adult Signature	<input type="checkbox"/> Priority Mail Express®	<input type="checkbox"/> Adult Signature Restricted Delivery	<input type="checkbox"/> Registered Mail™	<input checked="" type="checkbox"/> Certified Mail®	<input type="checkbox"/> Registered Mail Restricted Delivery	<input type="checkbox"/> Certified Mail Restricted Delivery	<input type="checkbox"/> Return Receipt for Merchandise	<input type="checkbox"/> Collect on Delivery	<input type="checkbox"/> Signature Confirmation™	<input type="checkbox"/> Collect on Delivery Restricted Delivery	<input type="checkbox"/> Signature Confirmation Restricted Delivery	<input type="checkbox"/> Insured Mail		<input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)	
<input type="checkbox"/> Adult Signature	<input type="checkbox"/> Priority Mail Express®																
<input type="checkbox"/> Adult Signature Restricted Delivery	<input type="checkbox"/> Registered Mail™																
<input checked="" type="checkbox"/> Certified Mail®	<input type="checkbox"/> Registered Mail Restricted Delivery																
<input type="checkbox"/> Certified Mail Restricted Delivery	<input type="checkbox"/> Return Receipt for Merchandise																
<input type="checkbox"/> Collect on Delivery	<input type="checkbox"/> Signature Confirmation™																
<input type="checkbox"/> Collect on Delivery Restricted Delivery	<input type="checkbox"/> Signature Confirmation Restricted Delivery																
<input type="checkbox"/> Insured Mail																	
<input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)																	
<p>PS Form 3811, July 2015 PSN 7530-02-000-8053</p> <p style="text-align: right;">Domestic Return Receipt</p>																	

Lea County

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Tracking Number: 70151520000251143454

On Time
Expected Delivery Day: Monday, February 29, 2016

Product & Tracking Information

Postal Product: First-Class Mail® Features: Certified Mail™ Return Receipt

See tracking for related item: 9590940101675234762918

Text Updates
Email Updates

DATE & TIME	STATUS OF ITEM	LOCATION
February 29, 2016, 11:58 am	Delivered	HOBBS, NM 88240
Your item was delivered at 11:58 am on February 29, 2016 in HOBBS, NM 88240.		
February 29, 2016, 6:26 am	Arrived at Unit	HOBBS, NM 88240
February 28, 2016, 4:32 pm	Departed USPS Destination Facility	LUBBOCK, TX 79402
February 28, 2016, 12:45 am	Arrived at USPS Destination Facility	LUBBOCK, TX 79402
February 26, 2016, 11:34 pm	Departed USPS Origin Facility	NORTH HOUSTON, TX 77315
February 26, 2016, 10:01 pm	Arrived at USPS Origin Facility	NORTH HOUSTON, TX 77315
February 26, 2016, 6:14 pm	Departed Post Office	HOUSTON, TX 77058
February 26, 2016, 2:28 pm	Acceptance	HOUSTON, TX 77058

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:
Mike Gallagher, Lea County Manager
Attn: Sandra Stout-Brito
100 North Main, Suite 4
Lovington, NM 88260

2. Article Number (Transfer from service label)
7015 1520 0002 5114 3461

PS Form 3811, July 2015 PSN 7530-02-000-9053

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X U. Gomez

B. Received by (Printed Name)
U. Gomez

C. Date of Delivery
FEB 29 2016

D. Is delivery address different from item 1? Yes
If YES, enter delivery address below: No

3. Service Type

<input type="checkbox"/> Adult Signature	<input type="checkbox"/> Priority Mail Express®
<input type="checkbox"/> Adult Signature Restricted Delivery	<input type="checkbox"/> Registered Mail™
<input checked="" type="checkbox"/> Certified Mail®	<input type="checkbox"/> Registered Mail Restricted Delivery
<input type="checkbox"/> Collect on Delivery	<input type="checkbox"/> Return Receipt for Merchandise
<input type="checkbox"/> Collect on Delivery Restricted Delivery	<input type="checkbox"/> Signature Confirmation™
<input type="checkbox"/> Insured Mail	<input type="checkbox"/> Signature Confirmation Restricted Delivery
<input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)	

Domestic Return Receipt

Southwestern Public Service Company

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Tracking Number: 70151520000251143522

Expected Delivery Day: Monday, February 29, 2016

Product & Tracking Information

Postal Product: First-Class Mail® Features: Certified Mail™ Return Receipt

See tracking for related item: 9590940101675234762857

Available Actions

Text Updates

Email Updates

DATE & TIME	STATUS OF ITEM	LOCATION
February 29, 2016 , 7:48 am	Delivered, Individual Picked Up at Postal Facility	DENVER, CO 80201
Your item was picked up at a postal facility at 7:48 am on February 29, 2016 in DENVER, CO 80201.		
February 28, 2016 , 12:15 pm	Arrived at USPS Destination Facility	DENVER, CO 80266
February 27, 2016 , 1:31 am	Departed USPS Origin Facility	NORTH HOUSTON, TX 77315
February 26, 2016 , 10:00 pm	Arrived at USPS Origin Facility	NORTH HOUSTON, TX 77315
February 26, 2016 , 6:14 pm	Departed Post Office	HOUSTON, TX 77058
February 26, 2016 , 2:28 pm	Acceptance	HOUSTON, TX 77058

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> Complete Items 1, 2, and 3. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 	<p>A. Signature </p> <p><input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) <u>Corita Osneros</u> C. Date of Delivery <u>2-29-16</u></p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>
<p>1. Article Addressed to:</p> <p>Southwestern Public Service Co Property Tax Department PO Box 840 Denver CO 80201 0840</p> <p></p> <p>9590 9401 0167 5234 7628 57</p>	<p>3. Service Type</p> <p><input type="checkbox"/> Adult Signature <input type="checkbox"/> Priority Mail Express® <input type="checkbox"/> Adult Signature Restricted Delivery <input type="checkbox"/> Registered Mail™ <input checked="" type="checkbox"/> Certified Mail® <input type="checkbox"/> Registered Mail Restricted Delivery <input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Signature Confirmation™ <input type="checkbox"/> Collect on Delivery Restricted Delivery <input type="checkbox"/> Signature Confirmation Restricted Delivery <input type="checkbox"/> Insured Mail <input type="checkbox"/> Signature Confirmation (over \$500) <input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)</p>
<p>2. Article Number (Transfer from service label)</p> <p>7015 1520 0002 5114 3522</p>	
PS Form 3811, July 2015 PSN 7530-02-000-9053	Domestic Return Receipt

Snyder Ranches, Inc.

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Tracking Number: 70151520000251143515

Product & Tracking Information

Postal Product: First-Class Mail® Features: Certified Mail™ Return Receipt

See tracking for related item: 9590940101675234762871

Text Updates
Email Updates

DATE & TIME	STATUS OF ITEM	LOCATION
March 1, 2016 , 3:01 pm	Delivered	HOBBS, NM 88240
Your item was delivered at 3:01 pm on March 1, 2016 in HOBBS, NM 88240.		
February 29, 2016 , 3:40 pm	Available for Pickup	HOBBS, NM 88240
February 28, 2016 , 4:31 pm	Departed USPS Destination Facility	LUBBOCK, TX 79402
February 28, 2016 , 12:45 am	Arrived at USPS Destination Facility	LUBBOCK, TX 79402
February 26, 2016 , 10:29 pm	Departed USPS Origin Facility	NORTH HOUSTON, TX 77315
February 26, 2016 , 10:06 pm	Arrived at USPS Origin Facility	NORTH HOUSTON, TX 77315
February 26, 2016 , 6:14 pm	Departed Post Office	HOUSTON, TX 77058
February 26, 2016 , 2:28 pm	Acceptance	HOUSTON, TX 77058

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 	<p>A. Signature</p> <p>X  <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) C. Date of Delivery</p> <p>Larry Schmitt 3-1-16</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>
<p>1. Article Addressed to:</p> <p>Snyder Ranches LTD PO Box 2158 Hobbs NM 88241</p>  <p>9590 9401 0167 5234 7628 71</p>	<p>3. Service Type</p> <p><input type="checkbox"/> Adult Signature <input type="checkbox"/> Priority Mail Express® <input type="checkbox"/> Adult Signature Restricted Delivery <input type="checkbox"/> Registered Mail™ <input type="checkbox"/> Certified Mail® <input type="checkbox"/> Registered Mail Restricted Delivery <input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Signature Confirmation™ <input type="checkbox"/> Collect on Delivery Restricted Delivery <input type="checkbox"/> Signature Confirmation Restricted Delivery <input type="checkbox"/> Insured Mail <input type="checkbox"/> Signature Confirmation Restricted Delivery (over \$500) <input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)</p>
<p>2. Article Number (Transfer from service label)</p> <p>7015 1520 0002 5114 3515</p>	
PS Form 3811, July 2015 PSN 7530-02-000-9053	Domestic Return Receipt

El Paso Natural Gas Company

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Tracking Number: 70151520000251143478

Product & Tracking Information

Postal Product: First-Class Mail®
Features: Certified Mail™ Return Receipt
See tracking for related item: 9590940101675234762901

Available Actions

[Text Updates](#)

[Email Updates](#)

DATE & TIME	STATUS OF ITEM	LOCATION
March 1, 2016, 8:06 am	Delivered, PO Box	HOUSTON, TX 77210
Your item has been delivered and is available at a PO Box at 8:06 am on March 1, 2016 in HOUSTON, TX 77210.		
February 27, 2016, 11:30 pm	Departed USPS Facility	NORTH HOUSTON, TX 77315
February 26, 2016, 10:08 pm	Arrived at USPS Facility	NORTH HOUSTON, TX 77315
February 26, 2016, 6:14 pm	Departed Post Office	HOUSTON, TX 77058
February 26, 2016, 2:28 pm	Acceptance	HOUSTON, TX 77058

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. <p>1. Article Addressed to: El Paso Natural Gas Co PO Box 4372 Houston TX 77210</p> <p>2. Article Number (Transfer from service label) 7015 1520 0002 5114 3478</p>	<p>A. Signature <input checked="" type="checkbox"/> <i>[Signature]</i> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) <i>Chris</i> C. Date of Delivery <i>3/11/16</i></p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input type="checkbox"/> No If YES, enter delivery address below:</p> <p>3. Service Type <input type="checkbox"/> Adult Signature <input type="checkbox"/> Priority Mail Express® <input type="checkbox"/> Adult Signature Restricted Delivery <input type="checkbox"/> Registered Mail™ <input checked="" type="checkbox"/> Certified Mail® <input type="checkbox"/> Registered Mail Restricted Delivery <input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Signature Confirmation™ <input type="checkbox"/> Collect on Delivery Restricted Delivery <input type="checkbox"/> Signature Confirmation Restricted Delivery <input type="checkbox"/> Insured Mail <input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)</p>
PS Form 3811, July 2015 PSN 7530-02-000-9053	Domestic Return Receipt

Carlin Properties, LLC

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Tracking Number: 7015152000251143492

Updated Delivery Day: Tuesday, March 1, 2016

Product & Tracking Information **Available Actions**

Postal Product: First-Class Mail® Features: Certified Mail™ Return Receipt Text Updates

See tracking for related item: 9590940101675234762888 Email Updates

DATE & TIME	STATUS OF ITEM	LOCATION
March 1, 2016, 10:03 am	Delivered, Individual Picked Up at Post Office	MONUMENT, NM 88265
Your item was picked up at the post office at 10:03 am on March 1, 2016 in MONUMENT, NM 88265.		
February 29, 2016, 12:20 pm	Available for Pickup	MONUMENT, NM 88265
February 29, 2016, 12:19 pm	Arrived at Unit	MONUMENT, NM 88265
February 28, 2016, 4:31 pm	Departed USPS Destination Facility	LUBBOCK, TX 79402
February 28, 2016, 12:50 am	Arrived at USPS Destination Facility	LUBBOCK, TX 79402
February 27, 2016, 12:11 am	Departed USPS Origin Facility	NORTH HOUSTON, TX 77315
February 26, 2016, 10:21 pm	Arrived at USPS Origin Facility	NORTH HOUSTON, TX 77315
February 26, 2016, 6:14 pm	Departed Post Office	HOUSTON, TX 77058
February 26, 2016, 2:28 pm	Acceptance	HOUSTON, TX 77058

<p>SENDER: COMPLETE THIS SECTION</p> <ul style="list-style-type: none"> Complete items 1, 2, and 3. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. <p>1. Article Addressed to: Pamela Kaye Howard, Et Carlin Properties LLC PO Box 188 Monument NM 88265-0188</p> <p> 9590 9401 0167 5234 7628 88</p> <p>2. Article Number (Transfer from service label) 7015 1520 0002 5114 3492</p>	<p>COMPLETE THIS SECTION ON DELIVERY</p> <p>A. Signature <input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) TIM CARLIN</p> <p>C. Date of Delivery 3-1-16</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input checked="" type="checkbox"/> No</p> <p>3. Service Type</p> <table border="0"> <tr> <td><input type="checkbox"/> Adult Signature</td> <td><input type="checkbox"/> Priority Mail Express®</td> </tr> <tr> <td><input type="checkbox"/> Adult Signature Restricted Delivery</td> <td><input type="checkbox"/> Registered Mail™</td> </tr> <tr> <td><input checked="" type="checkbox"/> Certified Mail®</td> <td><input type="checkbox"/> Registered Mail Restricted Delivery</td> </tr> <tr> <td><input type="checkbox"/> Certified Mail Restricted Delivery</td> <td><input type="checkbox"/> Return Receipt for Merchandise</td> </tr> <tr> <td><input type="checkbox"/> Collect on Delivery</td> <td><input type="checkbox"/> Signature Confirmation™</td> </tr> <tr> <td><input type="checkbox"/> Collect on Delivery Restricted Delivery</td> <td><input type="checkbox"/> Signature Confirmation Restricted Delivery</td> </tr> <tr> <td><input type="checkbox"/> Insured Mail</td> <td></td> </tr> <tr> <td><input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)</td> <td></td> </tr> </table>	<input type="checkbox"/> Adult Signature	<input type="checkbox"/> Priority Mail Express®	<input type="checkbox"/> Adult Signature Restricted Delivery	<input type="checkbox"/> Registered Mail™	<input checked="" type="checkbox"/> Certified Mail®	<input type="checkbox"/> Registered Mail Restricted Delivery	<input type="checkbox"/> Certified Mail Restricted Delivery	<input type="checkbox"/> Return Receipt for Merchandise	<input type="checkbox"/> Collect on Delivery	<input type="checkbox"/> Signature Confirmation™	<input type="checkbox"/> Collect on Delivery Restricted Delivery	<input type="checkbox"/> Signature Confirmation Restricted Delivery	<input type="checkbox"/> Insured Mail		<input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)	
<input type="checkbox"/> Adult Signature	<input type="checkbox"/> Priority Mail Express®																
<input type="checkbox"/> Adult Signature Restricted Delivery	<input type="checkbox"/> Registered Mail™																
<input checked="" type="checkbox"/> Certified Mail®	<input type="checkbox"/> Registered Mail Restricted Delivery																
<input type="checkbox"/> Certified Mail Restricted Delivery	<input type="checkbox"/> Return Receipt for Merchandise																
<input type="checkbox"/> Collect on Delivery	<input type="checkbox"/> Signature Confirmation™																
<input type="checkbox"/> Collect on Delivery Restricted Delivery	<input type="checkbox"/> Signature Confirmation Restricted Delivery																
<input type="checkbox"/> Insured Mail																	
<input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)																	

PS Form 3811, July 2015 PSN 7530-02-000-9063 Domestic Return Receipt

International Isotopes, Inc.

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Tracking Number: 70151520000251143485

Product & Tracking Information **Available Actions**

Postal Product: First-Class Mail® Features: Certified Mail™ Return Receipt

Text Updates

See tracking for related item: 9590940101675234762895

Email Updates

DATE & TIME	STATUS OF ITEM	LOCATION
March 1, 2016 , 11:35 am	Delivered	LOVINGTON, NM 88260
Your item was delivered at 11:35 am on March 1, 2016 in LOVINGTON, NM 88260.		
February 29, 2016 , 9:43 am	Notice Left (No Authorized Recipient Available)	LOVINGTON, NM 88260
February 29, 2016 , 6:55 am	Arrived at Unit	LOVINGTON, NM 88260
February 28, 2016 , 2:57 am	Departed USPS Facility	LUBBOCK, TX 79402
February 28, 2016 , 12:42 am	Arrived at USPS Destination Facility	LUBBOCK, TX 79402
February 26, 2016 , 11:33 pm	Departed USPS Origin Facility	NORTH HOUSTON, TX 77315
February 26, 2016 , 10:20 pm	Arrived at USPS Origin Facility	NORTH HOUSTON, TX 77315
February 26, 2016 , 6:14 pm	Departed Post Office	HOUSTON, TX 77058
February 26, 2016 , 2:28 pm	Acceptance	HOUSTON, TX 77058

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:
International Isotopes Inc, DBA
100 N. Main, Suite 4
Lovington
NM 88260


9590 9401 0167 5234 7628 95

2. Article Number (Transfer from service label)
7015 1520 0002 5114 3485

PS Form 3811, July 2015 PSN 7530-02-000-9053

COMPLETE THIS SECTION ON DELIVERY

A. Signature
XU Gomez Agent Addressee

B. Received by (Printed Name)
U. Gomez

C. Date of Delivery
NOV 29 2016

D. Is delivery address different from item 1? Yes No
If YES, enter delivery address below:

3. Service Type

<input type="checkbox"/> Adult Signature	<input type="checkbox"/> Priority Mail Express®
<input type="checkbox"/> Adult Signature Restricted Delivery	<input type="checkbox"/> Registered Mail™
<input checked="" type="checkbox"/> Certified Mail®	<input type="checkbox"/> Registered Mail Restricted Delivery
<input type="checkbox"/> Certified Mail Restricted Delivery	<input type="checkbox"/> Return Receipt for Merchandise
<input type="checkbox"/> Collect on Delivery	<input type="checkbox"/> Signature Confirmation™
<input type="checkbox"/> Collect on Delivery Restricted Delivery	<input type="checkbox"/> Signature Confirmation Restricted Delivery
<input type="checkbox"/> Insured Mail	
<input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)	

Domestic Return Receipt

Randy and Naomi Smith

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Tracking Number: 7015152000251143508

On Time
Expected Delivery Day: Monday, February 29, 2016

Product & Tracking Information

Postal Product: First-Class Mail®

Features: Certified Mail™ Return Receipt

See tracking for related item: 9590940101675234762826

Available Actions

[Text Updates](#)

[Email Updates](#)

DATE & TIME	STATUS OF ITEM	LOCATION
February 29, 2016 , 9:01 am	Available for Pickup	CARLSBAD, NM 88220
Your item arrived at the CARLSBAD, NM 88220 post office at 9:01 am on February 29, 2016 and is ready for pickup.		
February 29, 2016 , 8:35 am	Out for Delivery	CARLSBAD, NM 88221
February 29, 2016 , 8:25 am	Sorting Complete	CARLSBAD, NM 88221
February 29, 2016 , 5:38 am	Arrived at Unit	CARLSBAD, NM 88220
February 28, 2016 , 6:25 am	Departed USPS Destination Facility	LUBBOCK, TX 79402
February 28, 2016 , 12:45 am	Arrived at USPS Destination Facility	LUBBOCK, TX 79402
February 26, 2016 , 10:42 pm	Departed USPS Origin Facility	NORTH HOUSTON, TX 77315
February 26, 2016 , 9:59 pm	Arrived at USPS Origin Facility	NORTH HOUSTON, TX 77315
February 26, 2016 , 6:14 pm	Departed Post Office	HOUSTON, TX 77058
February 26, 2016 , 2:28 pm	Acceptance	HOUSTON, TX 77058

Public Notice Posted Locations

The public notices were posted in the following four publicly accessible and conspicuous places:

- Hobbs Generating Station entrance.
- Hobbs Public Library.
- Hobbs City Hall.
- Online Hobbs Community Bulletin Board of Hobbs City Hall (www.hobbsnm.org/bulletin_board.html).

Copy of 2015 Property Tax Record Document

DISTRIBUTION	TAXABLE VALUE	TAX RATES	AMOUNT DUE
STATE -N/R	49333333	1.360	67093.33
COUNTY -N/R	49333333	10.600	522933.33
SCHOOL -N/R	49333333	10.481	517062.67
NON-RES SUBTOTAL	49333333	22.441	1107089.33
JUNIOR COLLEGE	49333333	5.000	246666.67
			TOTAL 1353756.00

(AP) LEA POWER PARTNERS, LLC
 Approved By: *[Signature]*
 Date: 10-19-15 P.O.#
 A/C: *[Handwritten]*
 Unit: *[Handwritten]*
 Payment Reference
 A/P Batch # CK Batch #
 Date Paid: Processed:
 Req.: W/O:
 60-2208000

2015 TAX BILL

Remit to: **DONNA DUNCAN**
 Lea County Treasurer
 100 N Main Ave Suite 3C
 Lovington NM 88260-4000
 (575) 396-8643

BILL NO.: 2015-0017829 **OWNER NO.:** 0205769

PROPERTY DESCRIPTION	
PROPERTY # 4 000 407 020 001	12/5/11-DEDICATION OF 1.55 AC TO TWOMBLY LAKE
SECTION-23 TOWNSHIP-185 RANGE-36E	
160.00 AC BEING S2NE4, W2SE4	
CAB# 220-019 UNPROTESED VALUE	
7/16/07-SMITH, RANDY D PRT #40702	
2007-LEA POWER PARTNERS (INCORRECT)	
SW4 SEC 24 CHANGED SUBSEQUENT FOR 2007 & CORRECTED FOR 2008	
B-1486 P-636	
2015 UNPROTESTED VALUE	
PROPERTY # 4 971 119 095 721	
SECTION-24 TOWNSHIP-185 RANGE-36E	
153.03 AC BEING SW4	
*LESS TR BEG S50D11'39"E 420.10'	
W/ON NE COR SW4 SEC 24, T8	
S00D28'E 510', S89D32'W 595'	
N00D28'W 510', N89D32'E 595'	
TO BEG (6.97 AC)	
12/19/06-SMITH, RANDY D PRT #40702	
B-1486 P-636	
2007-WAS ALL LEA POWER PARTNERS (INCORRECT) SUBSEQUENT FOR 2007	
6/27/07-REDESCRIBED PRT TO #90111	
SOUTHWESTERN PUBLIC SERVICE CO	
(6.97 AC) B-1520 P-994	

Received
 OCT 20 2015
 RB

RECEIVED OCT 19 2015

School District: 160

RESIDENTIAL	FULL VALUE	TAXABLE VALUE
RECEIVED 10-19-15		
NON-RES	FULL VALUE	TAXABLE VALUE
CENTRAL	147999999	49333333
NET		49333333
TOTAL NET VALUE		49333333

Your mortgage company may be paying this bill:
 However, it is the responsibility of the property owner to ensure property taxes are paid. Owners with mortgages should contact lender to determine responsibility for payment of tax. **First half payment or payment in full will be delinquent after December 10. Second half payment will be delinquent after May 10.**
THIS IS THE ONLY NOTICE YOU WILL RECEIVE FOR BOTH INSTALLMENTS OF TAX.
Your canceled check is your receipt unless you provide a self-addressed, stamped envelope.
 (You may pay online at www.leacounty.net or call 1-575-396-8643, Visa, MasterCard, Discover & Amex.)

YEAR	BILL NO.	TAX	INTEREST	PENALTY	LATE	AMOUNT DUE

PRIOR TAXES, IF ANY, MUST BE PAID BEFORE ACCEPTING CURRENT YEAR PAYMENT.

Tax Rates are expressed in Dollars per Thousand. Taxable Value is 33 1/3% of Full Value.

Remit to: **DONNA DUNCAN**
 Lea County Treasurer
 100 N Main Ave Suite 3C
 Lovington NM 88260-4000
 (575) 396-8643

Received
 OCT 20 2015

Lea County - 1ST HALF COUPON
 Due November 10
 1st Half Amount: **\$676,878.00**

RB
www.leacounty.net
 Or Call 575-396-8643

TO PAY IN FULL
1,353,756.00
Bill No: 2015-0017829 Owner No: 0205769

Print this Bill No. & Owner No. on your check or money order.

Send both coupons with full year payment or detach and return this coupon with first half payment. Keep the coupon to the right for second half payment. To avoid interest and penalty charges, pay by December 10th.

Lea County - 2ND HALF COUPON
 Due April 10
 2nd Half Amount: **\$676,878.00**

www.leacounty.net
 Or Call 575-396-8643
 A nominal fee is charged for this service.

Bill No: 2015-0017829
Owner No: 0205769
Print this Bill No. & Owner No. on your check or money

Owner:
LEA POWER PARTNERS LLC
98 TOMBLY LN
HOBBS NM 88240-9359

0553#1
 LEA POWER PARTNERS LLC
 98 TOMBLY LN
 HOBBS NM 88240-9359

24212

Remit to:
 Lea County Treasurer
 100 N Main Ave Suite 3C
 Lovington NM 88260-4000
 (575) 396-8643

To avoid interest and penalty charges, pay by May 10. Detach and return this coupon with second half payment by May 10.

If your address has changed, please check this box and indicate address changes on the back of this coupon.

If your address has changed, please check this box and indicate address changes on the back of this coupon.

Sample of Letters Sent to Property Owners, Counties, Municipalities and Indian Tribes



LEA POWER PARTNERS

Hobbs Generating Station
98 N. Twombly Lane
Hobbs, NM 88240
Ph 575-397-6700 Fax 575-397-6795

{DATE}

{NAME}
{ADDRESS}

RE: CERTIFIED MAIL _____

Dear Sir/Madam,

According to New Mexico air quality regulations, **Lea Powers Partners, LLC** must announce its intent to apply to the New Mexico Environment Department for a modification of the site's air quality permit to increase the emission rates of the combustion turbines at its **Hobbs Generating Station**. The expected date of application submittal to the Air Quality Bureau is **March 10, 2016**.

The exact location for the proposed facility known as **Hobbs Generating Station** is at 98 N. Twombly Lane, Hobbs, NM 88240. The approximate location of this facility is 8 miles W. of Hobbs in Lea County, New Mexico.

The proposed modification consists of increasing the authorized carbon monoxide (CO) startup, shutdown and maintenance (SSM) emission rate of the combustion turbines. The units have not been modified or upgraded since they were last authorized in 2014, however, Lea Power Partners, LLC wishes to correct the discrepancies between the currently authorized CO SSM emission rate and the CO SSM emission rate achievable according to the unit's actual performance data during SSM events. The estimated maximum quantities of any regulated air contaminant sitewide will be:

Pollutant:	Pounds per hour	Tons per year
Total Suspended Particulates (TSP)	35.3	88.6
PM ₁₀	34.9	87.3
PM _{2.5}	34.5	86.1
Sulfur Dioxide (SO ₂)	22.4	48.5
Nitrogen Oxides (NO _x)	400.6	184.7
Carbon Monoxide (CO)	5,024.5	291.2
Volatile Organic Compounds (VOC)	156.1	96.7
Total sum of all Hazardous Air Pollutants (HAPs)	4.7	3.4
Total sum of all Toxic Air Pollutants (TAPs)	64.2	281.3
Green House Gas Emissions as Total CO ₂ e	n/a	1,895,955

These emission rate estimates could change slightly during the course of the Department's review of the application.

The standard operating schedule of the facility will be 24 hours a day, 7 days a week and a maximum of 52 weeks per year. The maximum operating schedule will be 24 hours a day, 7 days a week and a maximum of 52 weeks per year.

Owners and operators of the facility include:

Owner: Lea Power Partners, LLC, 919 Milam Street, Suite 2300, Houston, TX, 77002

Operator: CAMS - NM, 98 N. Twombly Lane, Hobbs, NM 88240

If you have any comments about the proposed permit changes 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
525 Camino de los Marquez, Suite 1
Santa Fe, New Mexico 87505-1816
(505) 476-4300

Other comments and questions may be submitted verbally.

Please refer to the company name and facility 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 Department's notice will be published in the legal section of a newspaper circulated near the facility location.

Sincerely,



David Baugh

Asset Manager, Lea Power Partners, LLC
919 Milam Street, Suite 2300
Houston, TX 77002

Notice Posted in Public Accessible Places

NOTICE

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Please refer to the company name and facility 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 Department's notice will be published in the legal section of a newspaper circulated near the facility location.

Local Posting Verification

General Posting of Notices – Certification

I, Leslie Wills, the undersigned, certify that on March 1, 2016 I posted a true and correct copy of the attached Public Notice in the following publicly accessible and conspicuous places in or close to the City of Hobbs, Lea County, State of New Mexico and that these signs remained in place for the time period of March 1, 2016 to April 1, 2016.

1. Hobbs Generating Station entrance
2. Hobbs Public Library
3. Hobbs City Hall

Signed this 1st day of March, 2016

Leslie Wills 3/1/2016

Signature

Leslie Wills

Printed Name

Office Manager – Hobbs Generating Station

Title

Online Hobbs Community Bulletin Board of Hobbs City Hall

Receipt of Public Notice – Certification

I, Joseff Amador, the undersigned, certify that on 3/9/16 I received a public notice to be posted on the online Community Bulletin Board (<http://www.hobbsnm.org/cbb.html>) that serves the Hobbs City of Lea County, New Mexico, in which the source is or is proposed to be located.

Signed this 11 day of March, 2016.

Joseff Amador
Signature
Joseff Amador
Printed Name

3/11/16
Date

List of Entities Receiving the Certified Letters

Hobbs Generating Station is located in Lea County, which is considered a Class B County, based on county population and assessed property value¹. Therefore, based on the NMED regulation 20.2.72.203(B)(1), public notifications consisting of a certified letter describing the permit application were sent to the property owners that are within one-half mile of the Hobbs property boundary.

Additionally, the NMED regulation 20.2.72.203(B)(2) requires that notices be sent to all municipalities and counties in which the facility is or will be located and all municipalities, counties, and Indian tribes that are within a 10 mile radius from the boundary of the property on which the facility is or will be located. The list of all municipalities in Lea County was obtained from <http://www.nmml.org/>. Hobbs Generating Station is located 8 miles west of Hobbs, New Mexico, in Lea County and the distance from this Station to the borders of Lea County is more than 10 miles in all directions. Therefore, a public notification consisting of a certified letter describing the permit was sent to City of Hobbs (Ms. Ann Betzen - Risk Manager of City of Hobbs) and to Lea County (Mr. Mike Gallagher - Lea County Manager). No additional notifications were submitted as no Indian tribes are located within a 10 mile radius from the Hobbs property line. Table 9.1 summarizes the entities that received the certified letters.

Table 0-1 List of Entities Receiving the Certified Letters

Entity	Address
City of Hobbs	Ann Betzen - Risk Manager City of Hobbs 200 E. Broadway
Lea County	Mike Gallagher - Lea County Manager Attn: Sandra Stout-Brito 100 North Main Suite 4 LOVINGTON, NM 88260
Southwestern Public Service Company	PO Box 840, Denver, CO, TX 77210
Snyder Ranches, Inc.	PO Box 2158 , Hobbs, NM 88241
El Paso Natural Gas Company	PO Box 4372, Houston, TX 77210
Carlin Properties, LLC	PO Box 188, Monument, NM 88265-0188
International Isotopes, Inc.	100 N Main, Suite 4, Lovington, NM 88260
Randy and Naomi Smith	PO Box 633, Carlsbad, NM 88221-0633

¹ http://www.nmdfa.state.nm.us/Annual_Report_2010.aspx

Copy of the Public Service Announcement (PSA) Sent to KYKK Radio Station

PUBLIC SERVICE ANNOUNCEMENT

1) Name, location and type of business

Hobbs Generating Station

98 N. Twombly Lane Hobbs, NM 88240. The approximate location of this facility is 8 miles W. of Hobbs in Lea County, New Mexico

The plant generates electricity for sale to Southwestern Public Service, its successors or assigns

2) Name of principal owner or operator

Lea Power Partners, LLC

919 Milam Street, Suite 2300

Houston, TX 77002

3) The type of process or change for which a permit is sought

The proposed modification consists of increasing the authorized carbon monoxide (CO) startup, shutdown and maintenance (SSM) emission rate of the combustion turbines. The units have not been modified or upgraded since they were last authorized in 2014, however, Lea Power Partners, LLC wishes to correct the discrepancies between the currently authorized CO SSM emission rate and the CO SSM emission rate achievable according to the unit's actual performance data during SSM events.

4) Locations where the notices have been posted

Public notices have been sent/posted as follows:

- Property Owners within ½ mile radius of the Hobbs Generating Station property boundary
- City of Hobbs Risk Manager, Ms. Ann Betzen
- Lea County Manager, Mr. Mike Gallagher
- Hobbs News Sun Newspaper
- Entrance Gate to Hobbs Generating Station
- Hobbs Public Library
- Hobbs City Hall
- Online Community Bulletin Board of Hobbs City Hall (www.hobbsnm.org/bulletin_board.html)

5) The NMED address or telephone number to which comments can be directed

Permit Programs Manager

New Mexico Environment Department

Air Quality Bureau

525 Camino de los Marquez, Suite 1

Santa Fe, New Mexico 87505-1816

Phone: (505) 476-4300 or 1 800 224-7009

Fax: (505) 476-4375

Copy of the "Submittal of Public Service Announcement – Certification"

Submittal of Public Service Announcement – Certification

I, Michele Espin, the undersigned, certify that on February 24th, 2016, submitted a public service announcement to **KYKK Radio Station** that serves the City of Hobbs, Lea County, New Mexico, in which the source is or is proposed to be located and that KYKK Radio Station **RESPONDED THAT IT WOULD NOT AIR THE ANNOUNCEMENT.**

Signed this 24th day of February, 2016

Michele Espin
Signature

2016-02-24
Date

Michele Espin
Printed Name

Coms eSPARC - Environmental Associate
Title

Affidavit of Publication – Legal Notice

Affidavit of Publication

STATE OF NEW MEXICO
COUNTY OF LEA

I, Daniel Russell, Publisher of the Hobbs News-Sun, a newspaper published at Hobbs, New Mexico, solemnly swear that the clipping attached hereto was published in the regular and entire issue of said newspaper, and not a supplement thereof for a period of 1 issue(s).

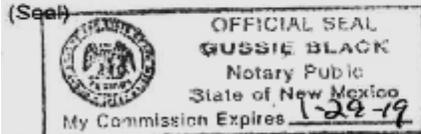
Beginning with the issue dated March 02, 2016 and ending with the issue dated March 02, 2016.

[Signature of Daniel Russell]
Publisher

Sworn and subscribed to before me this 2nd day of March 2016.

[Signature of Gussie Black]
Business Manager

My commission expires January 29, 2019



This newspaper is duly qualified to publish legal notices or advertisements within the meaning of Section 3, Chapter 167, Laws of 1937 and payment of fees for said

LEGAL LEGAL LEGAL
LEGAL NOTICE
March 2, 2016
NOTICE OF AIR QUALITY PERMIT APPLICATION
According to New Mexico air quality regulations, Lea Powers Partners, LLC must announce its intent to apply to the New Mexico Environment Department for a modification of the site's air quality permit to increase the emission rates of the combustion turbines at its Hobbs Generating Station. The expected date of application submitted to the Air Quality Bureau is March 10, 2016.
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PM 10 34.9 87.3
PM 2.5 34.5 86.1
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Green House Gas Emissions as Total CO2e n/a 1,885,955
These emission rate estimates could change slightly during the course of the Department's review of the application.
The standard operating schedule of the facility will be 24 hours a day, 7 days a week and a maximum of 52 weeks per year. The maximum operating schedule will be 24 hours a day, 7 days a week and a maximum of 52 weeks per year.
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Owner: Lea Power Partners, LLC, 919 Milam Street, Suite 2300, Houston, TX, 77002
Operator: CAMS - NM, 98 N. Twombly Lane, Hobbs, NM 88240
If you have any comments about the proposed permit changes 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
525 Camino de los Marquez, Suite 1
Santa Fe, New Mexico 87505 1818
(505) 476-4300
Other comments and questions may be submitted verbally.
Please refer to the company name and facility 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 Department's notice will be published in the legal section of a newspaper circulated near the facility location.
#30717

67111388

00171031

MONA JOHNSON
CAMS & SPARC, LLC
1110 NASA PKWY, Ste 212
HOUSTON, TX 77058

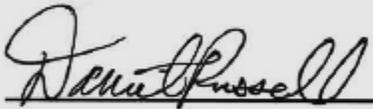
Affidavit of Publication – Display Notice

Affidavit of Publication

STATE OF NEW MEXICO
COUNTY OF LEA

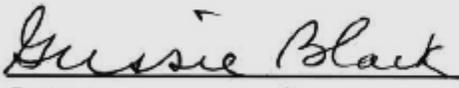
I, Daniel Russell, Publisher of the Hobbs News-Sun, a newspaper published at Hobbs, New Mexico, solemnly swear that the clipping attached hereto was published in the regular and entire issue of said newspaper, and not a supplement thereof for a period of 1 issue(s).

Beginning with the issue dated
March 02, 2016
and ending with the issue dated
March 02, 2016.



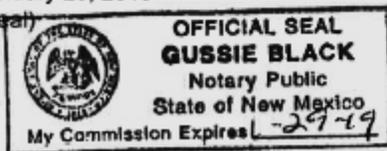
Publisher

Sworn and subscribed to before me this
2nd day of March 2016.



Business Manager

My commission expires
January 29, 2019
(Seal)



This newspaper is duly qualified to publish legal notices or advertisements within the meaning of Section 3, Chapter 167, Laws of 1937 and payment of fees for said

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Operator: CAMS - NM, 98 N. Twombly Lane, Hobbs, NM 88240

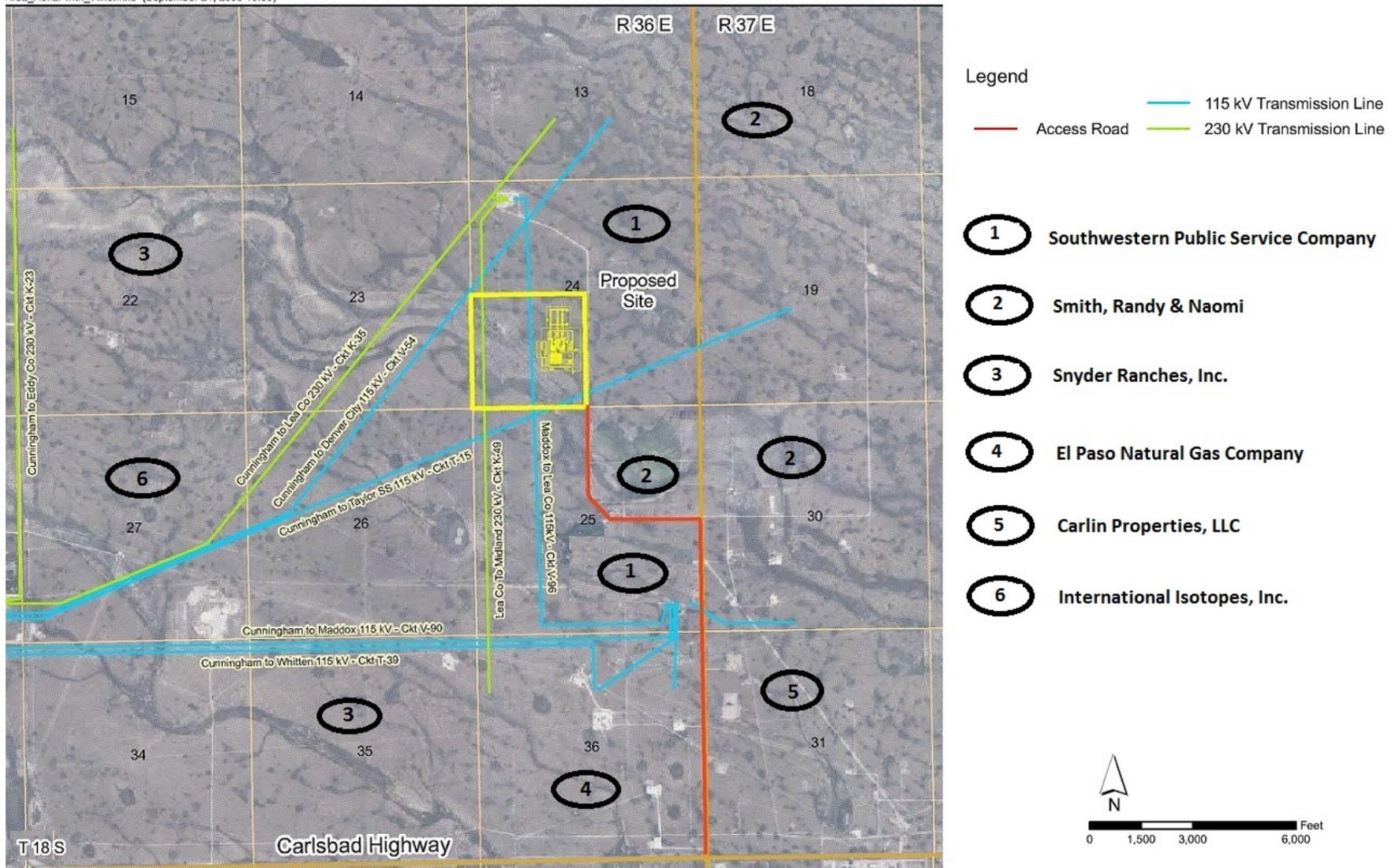
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Air Quality Bureau
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(505) 476-4300

Other comments and questions may be submitted verbally.

Please refer to the company name and facility 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 Department's notice will be published in the legal section of a newspaper circulated near the facility location.

Map of Hobbs and Surrounding Area in Which Owners Were Notified by Mail



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.

Hobbs is a natural gas fueled, nominal 600 MW net output power plant with two advanced firing temperature, Mitsubishi 501F CTGs, each provided with its own HRSG including duct burners, a single condensing, reheat STG, and an air cooled condenser serving the STG. The plant generates electricity for sale to Southwestern Public Service Company, its successors or assigns. The facility is located approximately 9 miles west of Hobbs, New Mexico in Lea County.

The exhaust from each CTG is delivered to a HRSG that produces the steam to drive the STG. Supplemental firing, using duct burners, is employed during periods of peak demand to increase HRSG steam production.

A surface condenser (heat exchanger) is used to condense the steam exhaust from the STG. Condensing the steam produces a slight vacuum, thus increasing the pressure differential that drives the steam turbine and increasing the overall efficiency of the power plant. Dry cooling is utilized to condense the steam exhaust from the steam turbine.

Several small emission sources are used at Hobbs, including 3 inlet chillers, 3 auxiliary cooling towers, 3 natural gas fuel heaters, a firewater pump, a standby generator and a number of storage tanks. The inlet air chilling system consists of 3 crossflow cooling towers that serve to enhance the overall output of the plant by lowering the temperature of the air entering the CTGs during periods of high ambient temperature (November through May). The auxiliary cooling towers consist of 3 crossflow closed-circuit wet cooling towers. The natural gas fuel heaters are used to pretreat the natural gas before it is fed to the CTGs. The firewater pump diesel engine is used to provide fire protection water for the plant and operates under 100 hours per year. The standby diesel generator operates under 500 hours per year and is used to provide the plant electrical requirements during complete black-out situations. Both engines fire low sulfur diesel fuel only.

Storage tanks at the site include two diesel tanks for the firewater pump diesel engine and the standby generator diesel engine, two additional diesel storage tanks, one gasoline storage tank, an aqueous ammonia storage tank for the SCR NOx emissions control unit, a caustic storage tank and an aqueous sulfuric acid storage tank for the cooling towers pH control, a neutralization tank that serves the wastewater facility, and several water storage tanks.

Section 11

Source Determination

Source submitting under 20.2.70, 20.2.72, 20.2.73, and 20.2.74 NMAC

Sources applying for a construction permit, PSD permit, or operating permit shall evaluate surrounding and/or associated sources (including those sources directly connected to this source for business reasons) and complete this section. Responses to the following questions shall be consistent with the Air Quality Bureau's permitting guidance, Single Source Determination Guidance, which may be found on the Applications Page in the Permitting Section of the Air Quality Bureau website.

Typically, buildings, structures, installations, or facilities that have the same SIC code, that are under common ownership or control, and that are contiguous or adjacent constitute a single stationary source for 20.2.70, 20.2.72, 20.2.73, and 20.2.74 NMAC applicability purposes. Submission of your analysis of these factors in support of the responses below is optional, unless requested by NMED.

A. Identify the emission sources evaluated in this section (list and describe):

HOBB-1, HOBB-2, DB-1, DB-2

B. Apply the 3 criteria for determining a single source:

SIC Code: Surrounding or associated sources belong to the same 2-digit industrial grouping (2-digit SIC code) as this facility, OR surrounding or associated sources that belong to different 2-digit SIC codes are support facilities for this source.

Yes No

Common Ownership or Control: Surrounding or associated sources are under common ownership or control as this source.

Yes No

Contiguous or Adjacent: Surrounding or associated sources are contiguous or adjacent with this source.

Yes No

C. Make a determination:

- The source, as described in this application, constitutes the entire source for 20.2.70, 20.2.72, 20.2.73, or 20.2.74 NMAC applicability purposes. If in "A" above you evaluated only the source that is the subject of this application, all "YES" boxes should be checked. If in "A" above you evaluated other sources as well, you must check **AT LEAST ONE** of the boxes "NO" to conclude that the source, as described in the application, is the entire source for 20.2.70, 20.2.72, 20.2.73, and 20.2.74 NMAC applicability purposes.
- The source, as described in this application, **does not** constitute the entire source for 20.2.70, 20.2.72, 20.2.73, or 20.2.74 NMAC applicability purposes (A permit may be issued for a portion of a source). The entire source consists of the following facilities or emissions sources (list and describe):

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.AG and 20.2.74.200 NMAC and 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 PSD source before and after this modification (if so, delete C and D below).
- a major PSD 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** one of the listed 20.2.74.501 Table I – PSD Source Categories. The “project” emissions for this modification are **not significant as proposed project increases do not exceed the PSD Significant Emission Rate (SER) for each pollutant (refer to Table 12-1 below)**. The “project” emissions listed below only result from changes described in this permit application, thus no emissions from other revisions or modifications, past or future to this facility. **This project will not cause or generate any additional emissions.** Also, specifically discuss whether this project results in “de-bottlenecking”, or other associated emissions resulting in higher emissions. The project emissions (before netting) for this project are as follows [see Table 2 in 20.2.74.502 NMAC for a complete list of significance levels]:

- a. **NOx: 184.7 TPY**
- b. **CO: 280.9 TPY**
- c. **VOC: 96.7 TPY**
- d. **SOx: 48.5 TPY**
- e. **TSP (PM): 88.6 TPY**
- f. **PM10: 87.3 TPY**
- g. **PM2.5: 86.1 TPY**
- h. **Fluorides: N/A**
- i. **Lead: N/A**
- j. **Sulfur compounds (listed in Table 2): N/A**
- k. **GHG: 1,897,124 TPY**

C. **Netting is not required (no annual emission rate increases proposed)**

D. **BACT is not required for this modification, as this application is a minor modification.**

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 are related, or could be considered a single project with this action, and provide an explanation for your determination whether a PSD modification is triggered.

A PSD modification is not required. There is no change in startup emissions since the original baseline period. The CO hourly mass emission rate limit was established for the first time when PSD Permit 3449-M3 was issued. This application provides a correction to the value that is required for that limit in the permit. There have been no physical changes or changes in method of operation that impact the startup emissions.

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.
No BACT analysis required for this revision.
- Submit a modeling protocol prior to submitting the permit application. **[Except for GHG]**
A modeling waiver request was submitted and approved. Therefore, a protocol was not required.
- Submit the monitoring exemption analysis protocol prior to submitting the application. **[Except for GHG]**
N/A- this is not a PSD major modification.

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 application addresses only a correction to the allowable hourly CO mass emission rate during startups. This change is necessary to reflect actual operating conditions that were not fully understood when the limit was proposed in 2014 (PSD 3440-M3). There is no physical change or change in method of operation proposed. There is no increase in annual emission rates proposed.

Section 13

Discussion Demonstrating Compliance With Each Applicable State & Federal Regulation

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.

There are no changes to prior representations. **Table 0–1** demonstrates compliance with each applicable State Regulations. **Table 0–2** demonstrates compliance with each applicable Federal Regulations.

Table 0–1 Applicable State Regulations

<u>STATE REGU- LATIONS CITATION</u>	Title	Applies to Entire Facility	Applies to Unit No(s).	Federally Enforce- able	Does Not Apply	JUSTIFICATION: Identify the applicability criteria, numbering each (i.e. 1. Post 7/23/84, 2. 75 m³, 3. VOL)
20.2.3 NMAC	Ambient Air Quality Standards NMAAQs	X	All	Yes		20.2.3 NMAC is a SIP approved regulation that limits the maximum allowable concentration of Total Suspended Particulates, Sulfur Compounds, Carbon Monoxide and Nitrogen Dioxide.
20.2.7 NMAC	Excess Emissions	X	All	Yes		All Title V major sources are subject to Air Quality Control Regulations, as defined in 20.2.7 NMAC, and are thus subject to the requirements of this regulation. Also listed as applicable in NSR Permit PSD 3449-M3.
20.2.33 NMAC	Gas Burning Equipment - Nitrogen Dioxide		DB-1, DB-2	Yes		Hobbs duct burners are new gas burning equipment with a heat input greater than 1,000,000 MMBtu/yr per unit. Hobbs fuel gas heaters are new gas burning equipment with a heat input less than 1,000,000 MMBtu/yr, therefore this part does not apply to these equipment. Note: "New gas burning equipment" means gas burning equipment, the construction or modification of which is commenced after February 17, 1972.
20.2.34 NMAC	Oil Burning Equipment: NO ₂	N/A	N/A	Yes	X	Not applicable. This facility has no oil burning equipment having a heat input of greater than 1,000,000 MMBtu/yr per unit.
20.2.35 NMAC	Natural Gas Processing Plant – Sulfur	N/A	N/A	N/A	X	Not applicable. Hobbs is not a Natural Gas Processing Plant; therefore, it is not subject to the requirements of 20.2.35 NMAC.

<u>STATE REGULATIONS CITATION</u>	Title	Applies to Entire Facility	Applies to Unit No(s).	Federally Enforceable	Does Not Apply	JUSTIFICATION: Identify the applicability criteria, numbering each (i.e. 1. Post 7/23/84, 2. 75 m³, 3. VOL)
20.2.37 NMAC	Petroleum Processing Facilities	N/A	N/A	No	X	Not applicable. Hobbs is not a Petroleum Processing Facility; therefore, it is not subject to the requirements of 20.2.37 NMAC.
20.2.38 NMAC	Hydrocarbon Storage Facilities	N/A	N/A	No	X	Not applicable. Hobbs does not have hydrocarbon storage tanks with a capacity of 20,000 gallons or greater, nor does it contain a "tank battery" or "Storage facility".
20.2.39 NMAC	Sulfur Recovery Plant - Sulfur	N/A	N/A	No	X	Not applicable. Hobbs is not a Sulfur Recovery Plant.
20.2.61.109 NMAC	Smoke & Visible Emissions		HOBB-1, HOBB-2, DB-1, DB-2, FH-1, FH-2, FH-3, G-1 and FP-1	No		Hobbs CTGs, HRSG duct burners, fuel gas heaters, standby generator and diesel fire pump will not cause visible emissions to equal or exceed an opacity of 20%.
20.2.70 NMAC	Operating Permits	X	All	Yes		Hobbs operates under Operating Permit No. P244-M4. The facility is a major source for NOx, CO, PM ₁₀ /PM _{2.5} and CO _{2e} .
20.2.71 NMAC	Operating Permit Fees	X	All	Yes		Hobbs is subject to 20.2.70 NMAC and is therefore subject to 20.2.71 NMAC.
20.2.72 NMAC	Construction Permits	X	All	Yes		Hobbs is subject to 20.2.72 NMAC and NSR Permit number: PSD 3449-M3.
20.2.73 NMAC	NOI & Emissions Inventory Requirements	X	All	Yes		Emissions Inventory Reporting: 20.2.73.300 NMAC applies. All Title V major sources meet the applicability requirements of 20.2.73.300 NMAC.
20.2.74 NMAC	Permits – PSD	X	All	Yes		Hobbs is a PSD major source as defined by: (1) Any stationary source listed in 20.2.74.501 NMAC Table 1 (i.e., fossil fuel-fired steam electric facilities greater than 250 MMBtu) which emits, or has the potential to emit, emissions equal to or greater than 100 tons per year of any regulated pollutant.
20.2.75 NMAC	Construction Permit Fees	X	All	Yes		This facility is subject to 20.2.72 NMAC and is in turn subject to 20.2.75 NMAC. N/A if subject to 20.2.71 NMAC.
20.2.77 NMAC	New Source Performance		HOBB-1, HOBB-2, G-1	Yes		Hobbs is a stationary source subject to the requirements of 40 CFR Part 60, as amended through September 23, 2013.
20.2.78 NMAC	Emission Standards for HAPS	X	N/A	Yes	X	Under normal operating conditions the site is not subject to 40 CFR Part 61. Refer to Table 13-2 40 CFR Part 61 Subpart M for further discussion.
20.2.79 NMAC	Permits – Nonattainment Areas	N/A	N/A	Yes	X	Not applicable. Hobbs is located in Lea County, an attainment area for all regulated pollutants.
20.2.80 NMAC	Stack Heights	N/A	N/A	Yes	X	Not cited as applicable in NSR Permit PSD 3449-M3.
20.2.82 NMAC	MACT Standards for source categories of HAPS		G-1, FP-1	Yes		Hobbs is a minor source of hazardous air pollutants. The standby generator and fire water pump are subject to 40 CFR 63 Subpart ZZZZ.

Table 0-2 Applicable Federal Regulations

<u>FEDERAL REGULATIONS CITATION</u>	Title	Applies to Entire Facility	Applies to Unit No(s).	Federally Enforceable	Does Not Apply	JUSTIFICATION:
40 CFR 50	NAAQS	X	N/A	Yes		Defined as applicable at 20.2.70.7.E.11. Any national ambient air quality standard. Not directly applicable to individual emission sources.
NSPS 40 CFR 60, Subpart A	General Provisions		HOBB-1, HOBB-2, DB-1, DB-2, G-1	Yes		Hobbs CTGs and HRSG duct burners are subject to 40 CFR 60 Subpart KKKK. Hobbs standby generator is subject to 40 CFR 60 Subpart IIII; therefore these units are also subject to 40 CFR 60 Subpart A - General Provisions.
NSPS 40 CFR 60.40a Subpart Da	Subpart Da, Performance Standards for Electric Utility Steam Generating Units	N/A	N/A	Yes	X	Not applicable. Emissions from the HRSG duct burners are subject to 40 CFR 60 Subpart KKKK and therefore are exempt from the requirements of Subpart Da.
NSPS 40 CFR 60.40b Subpart Db	Electric Utility Steam Generating Units	N/A	N/A	Yes	X	Not applicable. Emissions from the HRSG duct burners are subject to 40 CFR 60 Subpart KKKK and therefore are exempt from the requirements of Subpart Db.
NSPS 40 CFR 60, Subpart Ka	Standards of Performance for Storage Vessels for Petroleum Liquids for which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984	N/A	N/A	Yes	X	Not applicable. Hobbs has no petroleum liquid storage vessels subject to this regulation.
NSPS 40 CFR 60, Subpart Kb	Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984	N/A	N/A	Yes	X	Not applicable. Hobbs does not have storage vessels with a capacity greater than or equal to 75 cubic meters that is used to store volatile organic liquids (VOL) for which construction, reconstruction, or modification is commenced after July 23, 1984.

<u>FEDERAL REGULATIONS CITATION</u>	Title	Applies to Entire Facility	Applies to Unit No(s).	Federally Enforceable	Does Not Apply	JUSTIFICATION:
NSPS 40 CFR 60.330 Subpart GG	Stationary Gas Turbines	N/A	N/A	Yes	X	Units HOBB-1 and HOBB-2 have a heat input equal to 1,697 MMBtu/hour (nominal), which is greater than the 10 MMBtu/hour threshold. These units were manufactured on 2007 which is after the October 3, 1977 applicability date.
NSPS 40 CFR 60, Subpart KKK	Leaks of VOC from Onshore Gas Plants	N/A	N/A	Yes	X	Not applicable. Hobbs is not an Onshore Gas Plant.
NSPS 40 CFR 60 Subpart LLL	Standards of Performance for Onshore Natural Gas Processing: SO₂ Emissions	N/A	N/A	Yes	X	Not applicable. Hobbs is not an Onshore Natural Gas Processing plant.
NSPS 40 CFR 60, Subpart IIII	Standards of Performance for Stationary Compression Ignition Internal Combustion Engines		G-1	Yes		Hobbs Diesel Standby Generator was manufactured after July 1, 2006 and is not a fire pump engine. Therefore this unit is subject to the provisions of NSPS IIII, (§60.4200(a)(2)(i)). Hobbs Diesel Fire Water Pump, was manufactured and constructed in 2011, before all applicable trigger dates in the rule; therefore it is not subject to NSPS IIII.
NSPS 40 CFR Part 60 Subpart JJJ	Standards of Performance for Stationary Spark Ignition Internal Combustion Engines	N/A	N/A	Yes	X	Not applicable. Hobbs is not equipped with any stationary spark ignition internal combustion engine.
NSPS 40 CFR 60, Subpart KKKK	Stationary Combustion Turbines		HOBB-1, HOBB-2, DB-1, DB-2			HOBB-1 and HOBB-2 are stationary combustion turbines with a heat input at peak load greater than 10 MMBtu/hr (HHV) and commenced construction after February 18, 2005. Therefore the units are subject to the provisions of NSPS KKKK. The HRSG duct burners are also subject to the provisions of NSPS KKKK.
NSPS 40 CFR 60 Subpart OOOO	Standards of Performance for Crude Oil and Natural Gas Production, Transmission, and Distribution	N/A	N/A	Yes	X	Not applicable. Hobbs is not a Crude Oil and Natural Gas Production, Transmission and Distribution facility.
NSPS 40 CFR 60 Subpart TTTT	Standards of Performance for Greenhouse Gas Emissions for Electric Generating Units	N/A	N/A	Yes	X	Not applicable. Modification date predates NSPS applicability date.
NSPS 40 CFR 60 Subpart UUUU	Emissions Guidelines for Greenhouse Gas Emissions and Compliance Times for Electric Utility Generating Units	N/A	N/A	Yes	X	Not applicable. Hobbs is not an Electric Utility Generating Unit.

FEDERAL REGU- LATIONS CITATION	Title	Applies to Entire Facility	Applies to Unit No(s).	Federally Enforce- able	Does Not Apply	JUSTIFICATION:
NESHAP 40 CFR 61 Subpart A	General Provisions	X Potentially	Asbestos Demolition	Yes		Potentially Hobbs could be subject to 40 CFR 61 Subpart M. Refer to discussion below.
NESHAP 40 CFR 61 Subpart E	National Emission Standards for Mercury	N/A	N/A	Yes	X	Not applicable. This facility does not process mercury.
NESHAP 40 CFR 61 Subpart M	National Emission Standards for Asbestos	X Potentially	Asbestos Demolition	Yes		Not applicable during routine operation conditions. In the case of asbestos demolition, NESHAP M will apply.
NESHAP 40 CFR 61 Subpart V	National Emission Standards for Equipment Leaks (Fugitive Emission Sources)	N/A	N/A	Yes	X	Not applicable. Hobbs does not operate any sources in volatile hazardous air pollutant (VHAP) service.
MACT 40 CFR 63, Subpart A	General Provisions		G-1 FP-1 T-9	Yes		The Hobbs Diesel Standby Generator and Diesel Fire Water Pump are subject to MACT Subpart ZZZZ, and the gasoline storage tank is subject to MACT Subpart CCCCCC, therefore these sources must comply with the requirements of MACT Subpart A.
MACT 40 CFR 63.760 Subpart HH	Oil and Natural Gas Production Facilities	N/A	N/A	Yes	X	Not applicable. Hobbs is not an Oil and Natural Gas Production facility.
MACT 40 CFR 63 Subpart HHH	Natural Gas Transmission and Storage Facilities	N/A	N/A	Yes	X	Not applicable. Hobbs is not a natural gas transmission and storage facility.
MACT 40 CFR 63 Subpart ZZZZ	Stationary Reciprocating Internal Combustion Engines (RICE MACT)	N/A	G-1 FP-1	Yes		Hobbs Diesel Standby Generator (G-1) is a new (emergency) stationary RICE at an area source of HAPs. Per §63.6590(c)(1), G-1 meets the requirements of MACT ZZZZ by meeting the requirements of NSPS IIII. Hobbs Diesel Fire Water Pump (FP-1) is an existing emergency RICE at an area source of HAPs and must comply with the requirements of MACT ZZZZ as of May 3, 2013.
MACT 40 CFR 63 Subpart DDDDD	National Emission Standards for Hazardous Air Pollutants for Major Industrial, Commercial, and Institutional Boilers & Process Heaters	N/A	N/A	Yes	X	Not applicable. No major boilers and/or process heaters are located at Hobbs.

<u>FEDERAL REGU- LATIONS CITATION</u>	Title	Applies to Entire Facility	Applies to Unit No(s).	Federally Enforce- able	Does Not Apply	JUSTIFICATION:
MACT 40 CFR 63 Subpart UUUUU	National Emission Standards for Hazardous Air Pollutants Coal & Oil Fire Electric Utility Steam Generating Unit	N/A	N/A	Yes	X	Not applicable. Hobbs is not a coal and oil fire electric utility steam generating unit.
MACT 40 CFR 63 Subpart CCCCC	Gasoline Dispensing Facilities	N/A	T-9	Yes		The affected source is located at an area source of HAPs. The proposed gasoline storage tank (T-9) will have a monthly throughput of less than 10,000 gallons of gasoline, and therefore, T-9 must comply with the requirements in §63.11116, which include: (1) minimize gasoline spills; (2) clean up spills as expeditiously as practicable; (3) cover all open gasoline containers and all gasoline storage tank fill-pipes with a gasketed seal when not in use; and (4) minimize gasoline sent to open waste collection systems.
NESHAP 40 CFR 64	Compliance Assurance Monitoring	N/A	N/A	Yes	X	Hobbs CTGs/HRSG exhaust stacks are equipped with a CEMS that satisfy the CAM exemption requirements (§64.2(b)(1)(vi)).
NESHAP 40 CFR 68	Chemical Accident Prevention	N/A	N/A	Yes	X	Not applicable. Hobbs does not manufacture, process, use, store, or otherwise handle regulated substances in excess of the quantities specified in 10 CFR 68.
Title IV – Acid Rain 40 CFR 72	Acid Rain		HOBB-1, HOBB-2	Yes		Hobbs CTGs are subject to the requirements of the Acid Rain Program.
Title IV – Acid Rain 40 CFR 73	Sulfur Dioxide Allowance Emissions		HOBB-1, HOBB-2	Yes		Hobbs must obtain SO ₂ calendar year allowances.
Title IV – Acid Rain 40 CFR 75	Continues Emission Monitoring (CEM)		HOBB-1, HOBB-2	Yes		Hobbs CTG/HRSG exhaust stack is equipped with a CEMS for NO _x , CO and O ₂ .
Title IV – Acid Rain 40 CFR 76	Acid Rain Nitrogen Oxides Emission Reduction Program		N/A	Yes	X	Hobbs is not subject to the acid rain nitrogen oxides emission reduction program.
Title VI – 40 CFR 82	Protection of Stratospheric Ozone	X	N/A	Yes		Hobbs equipment includes appliances containing CFCs and is therefore subject to the requirements of 40 CFR 82. Hobbs uses only certified technicians for the maintenance, service, repair and disposal of these appliances and maintains the appropriate records.

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.
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Startup and shutdown procedures are either based on manufacturer's recommendations and/or based on Hobbs operating experience. These procedures are designed to proactively address the potential for malfunction to the greatest extent possible. These procedures dictate a sequence of operations that are designed to minimize emissions from the facility during events that result in shutdown and subsequent startup.

Hobbs equipment incorporates various safety devices and features that aid in the prevention of excess emissions in the event of an operational emergency. If an operational emergency does occur and excess emissions occur, Hobbs will submit the required Excess Emissions Report as per 20.2.7 NMAC. Corrective action to eliminate the excess emissions and prevent recurrence in the future will be undertaken as quickly as safety allows.

A copy of the current **Operational Plan to Mitigate SSM Emissions** is included in this section.

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.

Hobbs Generating Station does not have an alternative operating scenario at this time.

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.env.nm.gov/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.

An Air Modeling Waiver was approved for this project. Documentation is attached.

New Mexico Environment Department Air Quality Bureau Modeling Section 525 Camino de Los Marquez - Suite 1 Santa Fe, NM 87505		For Department use only: Approved: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Date: 2/22/2016 Approved by: Sufi Mustafa
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Air Dispersion Modeling Waiver Request Form

This form must be completed and submitted with all air dispersion modeling waiver requests.

If a permit is required, modeling is normally required for all pollutants, including state air toxics. In some cases, the demonstration that ambient air quality standards and PSD increments will not be violated can be satisfied with a discussion of previous modeling. The purpose of this form is to document and streamline requests to limit the new modeling that is submitted with an application. A waiver may be requested by e-mailing the completed form to the modeling manager, sufi.mustafa@state.nm.us. Permitting staff must approve the total emission rates during the permitting process for this waiver to be valid.

Contact and facility information:

Contact name	Mona Caesar Johnson, P.E.
E-mail Address:	mjohnson@camsesparc.com
Phone	(281) 333-3339 x 201
Facility Name	Hobbs Generating Station
Air Quality Permit Number(s)	PSD 3449-M3
AI Number (if known)	25726

This application proposes a significant revision to NSR Permit PSD 3449-M3 for Lea Power Partners, LLC (LPP) Hobbs Generating Station (Hobbs).

Hobbs is a natural gas fueled, nominal 600 MW gross output power plant with two advanced firing temperature, Mitsubishi 501F combustion turbine generators (CTGs), each provided with its own heat recovery steam generator (HRSG) including duct burners, a single condensing, reheat steam turbine generator (STG), and an air cooled condenser serving the STG. The plant generates electricity for sale to Southwestern Public Service Company, its successors or assigns. The facility is located approximately 9 miles west of Hobbs, New Mexico in Lea County.

In 2014, Hobbs submitted a significant revision application to allow the upgrade of both CTGs with new parts that have superior cooling technology. Several turbine components were upgraded as part of this project: Row 1 Blade Ring with E-Seals, Row 1 Compressor Blades, Row 1 Turbine Blades, Row 2 Turbine Blades, Row 3 Turbine Blades, Row 1 Vanes, Row 2 Vanes, Row 4 Vanes, Row 1 Ring Segments, and Row 2 Ring Segments. This change resulted in the need for less cooling air with a corresponding increase in fuel consumption, exhaust flow rate, temperature, and electricity production.

Although concentrations of NO_x, CO and VOC emitted from the turbine exhaust remained constant, there was an increase in actual mass emission rates of these pollutants due to the increased exhaust flow rate compared to historical past actual emission rates. Increases in particulate matter (PM₁₀ and PM_{2.5}) and SO₂, also occurred due to increased fuel consumption. Maintenance, Startup, and Shutdown (MSS) emissions did not change as a result of this project. However, during the permit application review process, NMED noted that although the permit included a concentration limit for CO during startups, it did not include a mass emission rate limit.

A maximum hourly mass emission rate limit was established based on information supplied by the catalyst vendor related to expected post-catalyst mass emissions during different types of startups. Based on this information, a permit limit of 441 lb/hr was requested. In July 2014, NMED performed a scaling analysis to confirm that the proposed MSS emission rate limit of 441 lb/hr would meet ambient air quality standards (Refer to Attachment 1).

In late 2015, Hobbs experienced a number of exceedances of the allowable CO hourly emission rate for startups. Further review of plant historical data shows that the representation for this limit in the turbine upgrade permit application is not achievable during actual operations. The emission representation previously provided assumed that a catalyst temperature of approximately 400°F would be achieved during the early phases of startup. However, the actual operating data shows that startups are frequently initiated with the catalyst temperature below this level. It is evident that the equipment is not capable of achieving the new limits. A revision to the PSD permit is necessary to provide the site with an achievable startup limit.

The only pollutant affected by this permitting action is CO during MSS operations. Since AERMOD is not pollutant specific, it is possible to extrapolate the modeling results for one pollutant and apply that to another pollutant for the same averaging period. Accordingly, Hobbs proposes that the results from the 2014 AERMOD 1-hour modeling analysis (1-hr NO₂) and the 2011 AERMOD 8-hour modeling analysis (8-hour NH₃) be scaled to demonstrate compliance with the CO NAAQS at the new proposed hourly MSS emission rate limit of 2,060 lb/hr. This yields 1-hour and 8-hour impacts significantly below the SIL and NAAQS. A full description of this analysis is provided in Attachment 2.

Section 1: Toxic air pollutants

(If the facility has no toxic air pollutants, note that here and delete the rest of Section 1.)

Modeling must be provided for any toxic air pollutant with a facility-wide controlled emission rate in excess of the emission levels specified in **20.2.72.502 NMAC** - Permits for Toxic Air Pollutants. Sources may use a correction factor based on release height for the purpose of determining whether modeling is required. Divide the emission rate for each release point by the correction factor for that release height and add the total values together to determine the total adjusted emission rate. If the total adjusted emission rate is lower than the emission rate screening level, then modeling is not required.

In the table below, list all of the State air toxics that are emitted at the facility. The table is pre-populated with common examples. Extra rows may be added for toxics not listed or for toxics emitted from multiple stack heights. Toxics not present at the facility may be deleted, left blank, or noted as 0 emission rate. Toxics previously modeled may be addressed in Section 3. Correction factors are listed in Appendix 1.

The current permitting action is related only to CO MSS emissions and does not involve an increase in the emission rate of any toxic air pollutant. PSD Permit 3449-M3 authorizes NH₃ emissions from each of the two CTG/HRSG units at 32.1 lb/hr. A discussion of previous modeling for toxics is included in Section 3.

Table 1: State Air Toxics Emitted at the Facility (PTE)

Release Point	Pollutant	Requested Allowable Emission Rate (pounds/hour)	Release Height (Meters)	Correction Factor	Allowable Emission Rate Divided by Correction Factor	Emission Rate Screening Level (pounds/hour)
HOBB-1+DB-1	NH ₃	32.1	50.29	108	0.3	
HOBB-2+DB-2	NH ₃	32.1	50.29	108	0.3	
Total NH ₃					0.6	1.20

Section 2: Pollutants with very low emission rates

(If the facility has no pollutants with very low emission rates, note that here and delete the rest of Section 2.)

The Bureau has performed generic modeling to demonstrate that small sources, as listed in Appendix 2, do not need modeling. List in Table 2 the pollutants that do not need to be modeled because of very low emission rates (listed in Appendix 2).

The facility has no pollutants with very low emission rates.

Section 3: Pollutants that have previously been modeled at equal or higher emission rates

(If the facility is not taking credit for previously modeled pollutants, note that here and delete the rest of Section 3.)

Request previous modeling reports from the Bureau if you do not have them and believe they exist before submitting the request. *List the pollutants and averaging periods in Table 3 that do not need to be modeled because previous modeling is still valid.*

Initial Air Dispersion Modeling (2006)

The initial air dispersion modeling analysis was completed in 2006 as part of the original pre-construction permitting process, using EPA Industrial Source Complex Short-Term (ISCST3) model (Version 02035). The model was used with regulatory default options as recommended in the EPA Guideline on Air Quality Models (EPA, 2003).

The modeling results indicated that the off-property ambient concentrations of all modeled pollutants due to the proposed project did not exceed the Class II area modeling significance levels (SIL) for NO_x, CO, SO₂, or PM₁₀ (Refer to Attachment 3). Therefore, in accordance with the procedures outlined in the EPA *Draft New Source Review Workshop Manual*, the proposed facility was assumed to insignificantly consume PSD increment. A full impact analysis was not required, and the Class II ambient impact analysis was complete.

CO startup emissions were modeled at a rate of 165 lb/hr for each stack. The resulting maximum downwind impacts associated with startup were 257.95 µg/m³ for 1-hour CO and 81.62 µg/m³ for 8-hour CO (Refer to Attachment 3).

Updated Air Dispersion Modeling (2011)

In 2011, air dispersion modeling was accomplished for a PSD-Minor Modification using AERMOD. The modification triggered modeling for toxics due to increased ammonia emissions. In the case of ammonia, the screening level is 1.20 pounds per hour. At 10 ppmvd at 15% O₂ slip, the total hourly emission rate from both turbines operating with duct burners is 64.2 pounds per hour.

The form of the design value for toxics modeling compares the 8-hr average ambient concentration of the toxic to one-one hundredth (0.01) of the Occupation Exposure Limit (OEL). For ammonia the OEL is 18.0 mg/m³; the 8-hr average is thus compared to 0.18 mg/m³. If the 8-hr average exceeds the design value, 20.2.72.403.B NMAC lists the requirements for a health assessment. The result of the ammonia modeling study for Hobbs demonstrated that the 8-hr average ambient ammonia concentration at the maximum emission rates do not exceed the threshold that triggers a health assessment. The completed air dispersion modeling analysis showed that the facility will not exceed the 8-hr ambient concentration of one-one hundredth of the OEL for ammonia.

The results of this analysis were scaled to obtain an 8-hour impact for the CO MSS emission rate proposed in the current permitting action.

Updated Air Dispersion Modeling for Upgrade Permit Revision (April 3 and April 27, 2014)

To improve the station performance, Hobbs proposed an upgrade of the turbine blades on both CTGs. The change resulted in the need for less cooling air, and resulted in an increase in fuel consumption, exhaust flow rate, temperature, and electricity production. Although the proposed project resulted in an increase in the actual (past actual vs. future allowable) mass emission rates of nitrogen oxides (NO_x), carbon monoxide (CO), particulate matter (PM₁₀ and PM_{2.5}), ammonia (NH₃), and sulfur dioxide (SO₂), the project did not require an increase in permit allowable emission rates. Therefore, Hobbs requested via correspondence with NMED on February 13, 2014 that air dispersion modeling requirements be waived. On March 13, 2014, NMED approved the modeling waiver for Hobbs for all criteria pollutant modeling except for the NAAQS analysis for 1-hr NO₂, 1-hr SO₂, 24-hr PM_{2.5}, and annual PM_{2.5}.

The following pollutants and emission rates were modeled. The results of this analysis were included in a modeling report dated April 3, 2014. The results of the 1-hr MSS (HOBBS-1 SSM) emissions modeling are proposed to be scaled to obtain 1-hour CO impacts related to the proposed permitting action.

2014 Modeled Hourly Emission Rates

Air Pollutant	HOBBS-1 + DB-1	HOBBS-2 + DB-2	HOBBS-1 SSM	HOBBS-2 SSM
NO _x (1-hr)	18.10 lb/hr	18.10 lb/hr	193.17 lb/hr	193.17 lb/hr
SO ₂ (1-hr)	10.70 lb/hr	10.70 lb/hr	10.70 lb/hr	10.70 lb/hr
PM _{2.5} (24-hr)	17.10 lb/hr	17.10 lb/hr	17.10 lb/hr	17.10 lb/hr
PM _{2.5} (Annual)	9.80 lb/hr	9.80 lb/hr	-	-

2014 NO₂ 1-hr Significant Impact Analysis

Air Pollutant	Avg Period	Modeled H1H Ground-Level Conc. (µg/m ³) ⁽¹⁾	Sig. Level (µg/m ³) ⁽²⁾
NO ₂ ⁽³⁾	1-hr	26.82	7.54

- (1) Highest modeled ground-level concentration for all scenarios evaluated: Unit 1 in SSM mode and Unit 2 in routine operation, with 80% (NO_x to NO₂) conversion applied to result. A scaled rate of 24.9 µg/m³ was obtained for a single unit in startup mode.
- (2) New Mexico AQB Air Dispersion Modeling Guidelines (Revised February 18, 2014). Table 6A.
- (3) NO₂ concentrations were estimated using a fixed rate conversion of 80% (NO_x to NO₂), 26.82 µg/m³ is the converted result; therefore, for scaling purposes, the non-converted result value will be used. (Refer to Section 2.6.4.3 of the New Mexico AQB Air Dispersion Modeling Guidelines (Revised February 18, 2014).

An update to this air dispersion modeling analysis was subsequently requested by NMED on April 21, 2014. The updated analysis addressed NO₂ and PM_{2.5} Increment Consumption and also included an updated PM_{2.5} NAAQS analysis. These scenarios are not relevant to the proposed permitting action.

The CO MSS emission rate changes were not contemplated at the time the 2014 modeling was completed. The CO MSS hourly mass emission rate limit was added during the NMED final review of the draft permit. At that time,

NMED scaled the CO modeling results that were previously obtained and determined that the 441 lb/hr limit would meet all ambient air quality standards (refer to Attachment 1).

Updated Air Dispersion Modeling for Auxiliary Equipment (July 22, 2015)

On April 1, 2015 LPP submitted an air dispersion modeling protocol in support of a significant revision to NSR Permit PSD 3449-M2 for Hobbs. LPP proposed a significant revision to its NSR Permit PSD 3449-M2 to resolve discrepancies between the hourly emission rate representations of some of the auxiliary equipment in operation at Hobbs and the rates actually listed in the PSD permit. The modeling analysis completed for this permit update involved only the auxiliary equipment and not the combined cycle units, which are the subject of the current permitting action. Therefore, additional information about this analysis is not included in this modeling waiver request.

Table 3: List of previously modeled pollutants (Combustion Turbine PTE)

Pollutant	Date of Most Recent Modeling	Averaging period	# of Units Included in Rate	Previously modeled emission rate (pounds/hour)*	Proposed emission rate (lb/hr)*	Modeled percent of standard
CO (Normal)	2006	1-hr, 8-hr	2	22.0	22	<16%
CO (MSS)	2006	1-hr	1	165.90		<13%
PM ₁₀	2011	24-hr	2	34.2	34.2	<39%
NH ₃	2011	8-hr	2	64.2	64.2	<3.0%
PM _{2.5} (Short Term)	2014	24-hr	2	34.2	34.2	<52%
PM _{2.5} (Long Term)	2014	Annual	2	19.60	19.60	<48%
NO ₂ (MSS)	2014	1-hr	1	193.17	193.2	<15%
SO ₂	2014	3-hr, 24-hr	2	21.4	21.4	<44%

* CTG plus duct firing (except MSS)

**Appears prior modeling analysis included filterable PM only

Question			Yes	No
Was modeling performed within the past four years?	Date of modeling report	October 4, 2006 September 21, 2011 April 3, 2014 April 27, 2014 July 22, 2015	X	
Was AERMOD used to model the facility? <i>ISCST3 model was used in 2006, AERMOD was used in 2011 (8-hr NH₃), 2014 (1-hr NO₂ and others), and 2015 (auxiliary equipment) studies.</i>				
Did previous modeling predict concentrations less than 95% of each air quality standard and PSD increment? <i>CO was less than 95% of NAAQS for each averaging period and is predicted using scaling to remain below this level.</i>			X	
<p>Were all averaging periods modeled that apply to the pollutants listed above? All averaging periods and pollutants applicable to each modeling analysis are listed below:</p> <p>October 2006 Modeling:</p> <ul style="list-style-type: none"> • NO₂: annual and 24hr • CO: 1hr, 8-hr • SO₂: 3hr, 24hr and annual • PM₁₀: 24hr and annual • NH₃: 1-hr <p>September 2011 Modeling:</p> <ul style="list-style-type: none"> • NH₃ : 8-hr <p>April 2014 Modeling:</p> <ul style="list-style-type: none"> • NO₂: 1-hr • SO₂: 1-hr • PM_{2.5}: 24hr and annual <p>July 2015 Modeling (Auxiliary Equipment Only):</p> <ul style="list-style-type: none"> • NO₂: annual and 24hr • CO: 1hr, 8-hr • TSP: 24hr and annual • PM₁₀: 24hr and annual • PM_{2.5}: 24hr and annual <p><i>**1-hour and 8-hour pollutant averaging periods were performed using AERMOD in 2014 and 2011, respectively.</i></p>				
Were all applicable startup/shutdown/maintenance scenarios modeled? <i>According to 2007 Modeling Report</i>			X	
Did modeling include all sources within 1000 meters of the facility fence line that now exist?			X	
<p>Did modeling include background concentrations at least as high as current background concentrations? <i>2007 Modeling Report references a 20µg/m³ background concentration for PM₁₀. 2011 NMED Guidance lists value of 21.1µg/m³ 2014 Modeling Report references 99.66µg/m³ background concentration for NO₂ and 12.4µg/m³ (24-hr)/6.4µg/m³ (Annual) for PM_{2.5} 2015 Guidance lists 2.1 ppm for CO (2006 Rio Rancho Monitor), 0.1µg/m³ background concentration for NO₂ and 12.4µg/m³ for PM_{2.5}</i></p>				X
<p>If a source is changing or being replaced, is the following equation true for all pollutants for which the waiver is requested? The source is not changing or being replaced.</p> $\frac{[(g) \times (h1)] + [(v1)^2/2] + [(c) \times (T1)]}{q1} \leq \frac{[(g) \times (h2)] + [(v2)^2/2] + [(c) \times (T2)]}{q2}$ <p>Where g = gravitational constant = 32.2 ft/sec² h1 = existing stack height, feet v1 = exhaust velocity, existing source, feet per second c = specific heat of exhaust, 0.28 BTU/lb-degree F T1 = absolute temperature of exhaust, existing source = degree F + 460</p>			X	

q1 = emission rate, existing source, lbs/hour h2 = replacement stack height, feet v2 = exhaust velocity, replacement source, feet per second T2 = absolute temperature of exhaust, replacement source = degree F + 460 q2 = emission rate, replacement source, lbs/hour		
Are all replacement stacks either the same direction as the replaced stack or vertical? Not applicable		

If you checked “no” for any of the questions, provide an explanation for why you think the previous modeling may still be valid anyway.

The proposed project will result in an increase in only the allowable CO MSS hourly emission rate limit. Scaled results for CO impacts were previously accepted by NMED when the hourly limit was first imposed in 2014. The current permitting action is a correction to the representation for this same limit. Accordingly, Hobbs is requesting that air dispersion modeling requirements for this project be waived. Scaled impacts are significantly less than the applicable standards.

Section 4: Discussions of scaled emission rates and scaled concentrations

(If not scaling previous results note that here and delete the rest of Section 4.)

At times it may be possible to scale the results of modeling one pollutant and apply that to another pollutant. If the analysis for the waiver gets too complicated, then it becomes modeling work rather than a modeling waiver, and applicable modeling fees will be charged for the modeling. Plume depletion, ozone chemical reaction modeling, post-processing, and unequal pollutant ratios from different sources are likely to invalidate scaling.

Describe scenarios below that you wish the modeling section to consider for scaling results to demonstrate compliance.

Please allow impacts associated with CO MSS emissions to be scaled based on results obtained using the same averaging periods in the past (1-hour in 2014 and 8-hour in 2011). Refer to Attachment 2 for details.

	lb/hr (per unit)	1-hr (µg/m³)	8-hr (µg/m³)
Modeled Value (1-hr)	193.17	31.14	
Modeled Value (8-hr)	32.11		5.4
Scaled Value (1-hr)	2,060	332.08	<i>[1 unit running at 1-hr rate, actual proposed scenario]</i>
Scaled Value (8-hr)	2,060		346.43 <i>[2 units running at 1-hr rate, very conservative representation]</i>
Standard (SIL)		2000	500

Appendix 1: Stack Height Release Correction Factor (adapted from 20.2.72.502 NMAC)

Release Height in Meters	Correction Factor
0 to 9.9	1
10 to 19.9	5
20 to 29.9	19
30 to 39.9	41
40 to 49.9	71
50 to 59.9	108
60 to 69.9	152
70 to 79.9	202
80 to 89.9	255
90 to 99.9	317
100 to 109.9	378
110 to 119.9	451
120 to 129.9	533
130 to 139.9	617
140 to 149.9	690
150 to 159.9	781
160 to 169.9	837
170 to 179.9	902
180 to 189.9	1002
190 to 199.9	1066
200 or greater	1161

Appendix 2. Very small emission rate modeling waiver requirements

Type of emissions	Modeling is waived if emissions of a pollutant for the entire facility (including haul roads) are below the amount:
Point source	0.1 lb/hr of H ₂ S or reduced sulfur, 1.0 lb/hr for other pollutants
Fugitive sources	0.01 lb/hr of H ₂ S or reduced sulfur, 0.1 lb/hr for other pollutants

Attachment 1

From: Hardison, Cember, NMENV <Cember.Hardison@state.nm.us>
Sent: Tuesday, July 22, 2014 6:24 PM
To: Mona Johnson; Zigich, Daren K, NMENV
Cc: Nuria de las Casas; Florence Rodriguez
Subject: RE: Hobbs Modeling

Thanks Mona.

The modeling waiver request didn't include the SSM emissions, so we needed to verify it was ok to waive the SSM CO emissions. Dave took a look at the previous modeling and determined through scaling, that CO SSM did not need to be modeled for this action.

Cember Hardison
505-476-4346

From: Mona Johnson [mailto:mjohnson@camesparc.com]
Sent: Tuesday, July 22, 2014 3:27 PM
To: Hardison, Cember, NMENV; Zigich, Daren K, NMENV
Cc: Nuria de las Casas; Florence Rodriguez
Subject: Hobbs Modeling

Cember and Daren-

Nuria gave me a quick update on your call. Sorry I could not break free to attend,.
We completed all of the modeling that was requested by your team, which included the 1-hr NO2 impacts due to startups.
CO modeling was not requested by NMED.

I am attaching the modeling report to this email.

Mona Caesar Johnson, P.E.

CAMS eSPARC, LLC

1110 NASA Parkway, Suite 212 Houston, TX 77058

Office: 281-333-3339 x201 Cell: 713-540-6821

mjohnson@camesparc.com

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Attachment 2 Scaling Analysis for Modeling Waiver Request

Lea Power Partners (LPP) is requesting a waiver from air dispersion modeling requirements for this permitting action, which involves only an increase in the authorized CO mass emission rate during startups. Only one unit will startup at any given time and duct burners are not in operation during the startup period. The second unit may be operating in normal mode during the startup of the other unit. Since AERMOD is not pollutant-specific, it is possible to extrapolate the modeling results for one pollutant and apply that to another pollutant for the same averaging period. Accordingly, air dispersion modeling results previously obtained for the 1-hour and 8-hour averaging periods applicable to CO standards may be scaled to obtain the ambient impact associated with the proposed changes. Therefore, LPP proposes to demonstrate compliance with the CO NAAQS by employing a scaling analysis based on 2011 and 2014 modeling results. These previous modeling analyses were performed for the same emission sources using AERMOD, the same stack parameters, modeling assumptions, building downwash inputs, Cartesian receptor grid, meteorological data, and terrain data.

In 2011, an AERMOD air dispersion modeling analysis was performed to evaluate 8-hour ammonia impacts with both units running simultaneously for the entire 8-hour averaging period. Application of this scenario to the proposed startup operations will obtain a very conservative result: only one unit will be in startup mode at any given time and startups do not last more than 3 hours. Therefore, the actual MSS 8-hour average emission rate will be significantly less than the represented maximum 1-hour rate, and the actual results will accordingly also be less than what is represented in this modeling waiver request. The scaled results obtained from this conservative method are 69.2% of the SIL and 3.5% of the NAAQS. Refer to Table 1.

Table 1. 8-Hour Analysis

Scenario	Averaging Period	Unit 1 Emission Rate (lb/hr)	Unit 2 Emission Rate (lb/hr)	Modeled/ Scaled Impact ($\mu\text{g}/\text{m}^3$)
2011 NH ₃	8-hour	32.11	32.11	5.40
2015 CO Scaled Impacts	8-hour	2,060	2,060	346.43

In 2014, an AERMOD air dispersion modeling analysis was performed to evaluate several pollutants and averaging times in support of the Turbine Upgrade project. One of the evaluated modeling scenarios was 1-hour NO₂, with a single unit in startup mode. This scenario may readily be scaled to represent the 1-hour CO impact from a single unit in operation. The scaled results are 16.6% of the SIL and 0.8% of the NAAQS. Refer to Table 2.

Table 2. 1-Hour Analysis

Scenario	Averaging Period	Unit 1 Emission Rate (lb/hr)	Modeled/ Scaled Impact ($\mu\text{g}/\text{m}^3$)
2014 NO ₂	1-hour	193.17	31.14
2015 CO Scaled Impacts	1-hour	2,060	332.08

Table 1: Table of Emissions and Stack Parameters:

Permit Num	Source ID	Description	UTMH (m)	UTMV (m)	Elevation (m)	Height	Temp (K)	ExitVel	Dia (m)	NOx (lbs/hr)	SO2 (lbs/hr)	CO (lbs/hr)	PM10 (lbs/hr)	NH3 (lbs/hr)
3449	STK1_CS	Hobbs Stack 1 Cold Start Worst Emissions in 24 hr Period	658372	3622364	1146	50.292	354.8	13.6	5.4864	18.40	9.10	165.90	15.87	
3449	STK2_CS	Hobbs Stack 2 Cold Start Worst Emissions in 24 hr Period	658456	3622364	1146	50.292	354.8	13.6	5.4864	18.40	9.10	165.90	15.87	
3449	STK1_DB	Hobbs Stack 1 100% Load Duct Burner Firing	658372	3622364	1146	50.292	354.8	22.6	5.4864	18.10	10.70	11.00	8.50	
3449	STK2_DB	Hobbs Stack 2 100% Load Duct Burner Firing	658456	3622364	1146	50.292	354.8	22.6	5.4864	18.10	10.70	11.00	8.50	
3449	STK1_100	Hobbs Stack 1 100% Load	658372	3622364	1146	50.292	354.8	19.6	5.4864	14.50	8.40	8.80	5.60	
3449	STK2_100	Hobbs Stack 2 100% Load	658456	3622364	1146	50.292	354.8	19.6	5.4864	14.50	8.40	8.80	5.60	
3449	STK1_75	Hobbs Stack 1 75% Load	658372	3622364	1146	50.292	354.8	16.4	5.4864	11.40	6.50	6.90	4.90	
3449	STK2_75	Hobbs Stack 2 75% Load	658456	3622364	1146	50.292	354.8	16.4	5.4864	11.40	6.50	6.90	4.90	
3449	STK1_50	Hobbs Stack 1 50% Load	658372	3622364	1146	50.292	354.8	13.6	5.4864	13.80	4.90	7.90	4.10	
3449	STK2_50	Hobbs Stack 2 50% Load	658456	3622364	1146	50.292	354.8	13.6	5.4864	13.80	4.90	7.90	4.10	
3449	STACK1	Hobbs Stack 1 Long Term	658372	3622364	1146	50.292	354.8	16.4	5.4864	16.70	9.20		6.90	

Permit Num	Source ID	Description	UTMH (m)	UTMV (m)	Elevation (m)	Height	Temp (K)	ExitVel	Dia (m)	NOx (lbs/hr)	SO2 (lbs/hr)	CO (lbs/hr)	PM10 (lbs/hr)	NH3 (lbs/hr)
3449	STACK2	Hobbs Stack 2 Long Term	658456	3622364	1146	50.292	354.8	16.4	5.4864	16.70	9.20		6.90	
3449	FUELA	Fuel heater A	658365	3622232	1146	6.096	380.37	8.016	0.24384	0.30	0.00	0.64	0.06	
3449	FUELB	Fuel heater B	658365	3622224	1146	6.096	380.37	8.016	0.24384	0.30	0.00	0.64	0.06	
3449	CHILL1A	Cell 1	658499	3622365	1146	15.24	306.48	10.82	3.048				0.01	
3449	CHILL1B	Cell 2	658503	3622365	1146	15.24	306.48	10.82	3.048				0.01	
3449	CHILL1C	Cell 3	658507	3622365	1146	15.24	306.48	10.82	3.048				0.01	
3449	CHILL1D	Cell 4	658512	3622365	1146	15.24	306.48	10.82	3.048				0.01	
3449	CHILL2A	Cell 1	658499	3622381	1146	15.24	306.48	10.82	3.048				0.01	
3449	CHILL2B	Cell 2	658503	3622381	1146	15.24	306.48	10.82	3.048				0.01	
3449	CHILL2C	Cell 3	658507	3622381	1146	15.24	306.48	10.82	3.048				0.01	
3449	CHILL2D	Cell 4	658512	3622381	1146	15.24	306.48	10.82	3.048				0.01	
3449	CHILL3A	Cell 1	658499	3622397	1146	15.24	306.48	10.82	3.048				0.01	
3449	CHILL3B	Cell 2	658503	3622397	1146	15.24	306.48	10.82	3.048				0.01	
3449	CHILL3C	Cell 3	658507	3622397	1146	15.24	306.48	10.82	3.048				0.01	
3449	CHILL3D	Cell 4	658512	3622397	1146	15.24	306.48	10.82	3.048				0.01	
3449	AUX1	Cell 1	658499	3622315	1146	15.24	306.48	10.82	3.048				0.02	
3449	AUX2	Cell 2	658499	3622319	1146	15.24	306.48	10.82	3.048				0.02	
3449	AUX3	Cell 3	658499	3622323	1146	15.24	306.48	10.82	3.048				0.02	
3449	GEN	Emg Gen not modeled	658402	3622410	1146	6.096	730.37	20.007	0.2134	4.20	0.16	2.30	0.13	
3449	FIRE	Fire Pump not modeled	658466	3622216	1146	6.096	724.82	24.811	0.1524	3.59	0.70	1.90	0.10	
3449	TAP_1	Ammonia Slip	658372	3622364	1146	50.292	354.8	16.4	5.4864					33.50
3449	TAP_2	Ammonia Slip	658456	3622364	1146	50.292	354.8	16.4	5.4864					33.50

Air Quality Dispersion Modeling Summary for Permit No. 3449

Modeling Parameters:

The following ISCST3 parameters were included in assumptions made by the model: Stack-tip downwash was considered. Buoyancy-induced dispersion was taken into account. Default wind profile exponents were used. Default vertical potential temperature gradients were used. Final plume rise was assumed. Building downwash produced by buildings at the facility was also considered using the PRIME algorithm.

Complex Terrain Data:

Both simple and complex types of terrain were used to model the facility. Elevations of receptors and facility sources were obtained from digitized USGS 7.5-minute maps and one degree maps.

Receptor Grid:

A Cartesian grid with variable receptor spacing was used to evaluate impacts around the facility. The model was run using a grid spacing of 50m along the fence line and out to 500m. Grid spacing of 100m was used from 500m to 1000m. Grid spacing of 250m was used from 1km to 3km, spacing of 500m used out to 5km, and a grid of 1000m was used from 5km out to 10km.

MET Data:

ISCST3 -- One (1) year Empire Abo 1993-1994; Empabo.is2

Adjacent Sources:

SO₂, NO₂, CO, PM₁₀, and TSP were not significant in the ROI runs so no surrounding sources were modeled for these pollutants.

Modeling Procedures:

NO₂, SO₂, CO, PM₁₀, and TSP emissions were modeled using EPA's ISCST3 model. No receptors exceeded significance level so no cumulative modeling runs were required.

PSD Class I Standards

The nearest PSD Class I area is Carlsbad Caverns National Park located 115km SSW of the facility. The facility has negligible impact at these distances and was not modeled for Class I impacts. FLMs were contacted by the consultant and agreed that no further modeling was required. The FLMs email responses were included in the permit application.

PSD Class II Standards

SO₂, NO₂, and PM₁₀ were under significance levels so no modeling was done for PSD increment consumption in Class II areas.

Results / Discussion:

NO2, SO2, CO, PM10, and TSP did not exceed significance levels so no cumulative modeling was required for any of the pollutants. All impacts shown in Table 2 are for facility sources only. A TAP analysis was done using 67 lb/hr of ammonia through the turbine stacks. With a stack height of 165m the screening level for ammonia is 129.6 lb/hr which is greater than the facility emissions so no modeling was required (20.2.72.502 tables A and C). The analysis demonstrates that impacts will not exceed applicable federal and state standards. Results are detailed in Table 2. Note: The impacts shown in Table 2 are the highest impacts for each pollutant modeled from all of the possible scenarios listed in Table 1. These impacts include the increased emissions emitted during cold startup of the turbines along with condensable particulate.

Table 2: Ambient Impact from Emissions

Permit Num	Pollutant	Contributing Sources	Avg'ing Period	Concentration (ug/m3)	Receptor Elevation (m)	UTMH (m)	UTMV (m)	Distance From Site (m)	Radius Of Impact (km)	Applicable Standard	Value of Standard	Units	Percentage of Standard
3449	CO	Any 2 CHILL wFH-B	1-hour	257.95	1145.7	658610	3622275	248	NA	Significance	2000	ug/m3	12.9
3449	CO	AnyChill AnyFH-CS	8-hour	81.62	1145.7	658664	3622414	251	NA	Significance	500	ug/m3	16.3
3449	TSP/PM 10	AnyChill AnyFH-CS	24-hour	4.91	1147.0	658212	3621956	510	NA	Significance	5	ug/m3	98.1
3449	TSP/PM 10	CHILL12 A	annual	0.17	1148.2	658164	3622864	505	NA	Significance	1	ug/m3	17.2
3449	NO2	C12FA50	24-hour	2.35	1147.0	658212	3621956	510	NA	Significance	5	ug/m3	47.1
3449	NO2	Any 2 CHILL wFH-A	annual	0.40	1148.5	657797	3622602	641	NA	Significance	1	ug/m3	39.7
3449	SO2	C12FACS	3-hour	6.76	1147.3	658179	3621955	525	NA	Significance	25	ug/m3	27.0
3449	SO2	C12FACS	24-hour	2.77	1147.0	658212	3621956	510	NA	Significance	5	ug/m3	55.4
3449	SO2	CHILL12 A	annual	0.09	1157.3	657414	3625364	3104	NA	Significance	1	ug/m3	9.4
3449	TAP	Ammonia Slip (lb/hr)	1-hr	67.00							129.6	lb/hr	51.7

Background concentrations of 20 ug/m3 for PM10 and 26.6 ug/m3 for TSP have been added to calculate final cumulative concentrations for both 24hr and annual time periods.
 75% annual conversion of NOX to NO2 from EPA's Ambient Ratio Method (ARM) applied to calculate concentration.
 NMED's 40% 24-hour conversion of NOX to NO2 applied to calculate concentration.

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.

Table 0-1 Compliance Test History Table

Unit No.	Permit No.	Permit Cond.	Test Description	Test Date
HOBB-1/DB-1	PSD 3449-M2	A401A	Initial Compliance for PM/PM10/PM2.5	3/5/2015 - 3/6/2015
		A401C	RATA testing in accordance with EPA test methods for NOx and CO.	9/23/2015 9/17/2014
		A401E	Annual ammonia compliance testing.	9/23/2015- 9/24/2015 9/17/2014
	PSD 3449-M1	A401C	RATA testing in accordance with EPA test methods for NOx and CO.	11/13/2013 11/7/2012 11/30/2011
		A401A	Annual stack testing for NOx and CO.	11/13/2013 11/7/2012 11/30/2011
		A401E	Annual ammonia compliance testing.	11/13/2013 11/7/2012 11/30/2011
HOBB-2/DB-2	PSD 3449-M2	A401A	Initial Compliance for PM/PM10/PM2.5	3/11/2015 - 3/12/2015
		A401C	RATA testing in accordance with EPA test methods for NOx and CO.	9/23/2015- 9/24/2015 9/16/2014
		A401E	Annual ammonia compliance testing.	9/25/2015- 9/27/2015 9/16/2014
	PSD 3449-M1	A401C	RATA testing in accordance with EPA test methods for NOx and CO.	11/14/2013 11/8/2012 12/1/2011
		A401A	Annual stack testing for NOx and CO.	11/14/2013 11/8/2012 12/1/2011
		A401E	Annual ammonia compliance testing.	11/14/2013 11/8/2012 12/1/2011
HOBB1	PSD 3449-M2	A401A	Initial Compliance for PM/PM10/PM2.5	9/29/2015- 10/1/2015

HOBB2	PSD 3449-M2	A401A	Initial Compliance for PM/PM10/PM2.5	9/29/2015- 10/1/2015
G-1	PSD 3449-M2	A111 B	Opacity test.	9/24/2015 9/17/2014
	PSD 3449-M1	A111 B	Opacity test.	11/12/2013 11/6/2012 11/29/2011
FP-1	PSD 3449-M2	A111 B	Opacity test.	9/24/2015 9/17/2014
	PSD 3449-M1	A111 B	Opacity test.	11/12/2013 11/6/2012 11/29/2011

Section 18

Addendum for Streamline Applications

Do not print this section unless this is a streamline application.

Streamline Applications do not require a complete application. Submit Sections 1-A, 1-B, 1-D, 1-F, 1-G, 2-A, 2-C thru L, Sections 3 thru 8, Section 13, Section 18, Section 22, and Section 23 (Certification). Other sections may be required at the discretion of the Department. 20.2.72.202 NMAC Exemptions do not apply to Streamline sources. 20.2.72.219 NMAC revisions and modifications do not apply to Streamline sources, thus 20.2.72.219 type actions require a complete new application submittal. Please do not print sections of a streamline application that are not required.

18-A: Streamline Category

1	<p>Indicate under which part of 20.2.72.301.D this facility is applying. Refer to the fourth column of Table 18-D below, to assist in this determination:</p> <p style="margin-left: 100px;"> <input type="checkbox"/> 20.2.72.301.D(1) NMAC <input type="checkbox"/> 20.2.72.301.D(2) NMAC <input type="checkbox"/> 20.2.72.301.D(3) NMAC </p>
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18-B: Streamline Applicability Criteria

18-B: Streamline Applicability Criteria		Answer (yes/no)
1	<p>Does the source category for this facility meet one of those listed in the following table? (20.2.72.301.A NMAC)</p> <p>20.2.72.501 Table 2 – Permit Streamlining Source Class Categories</p> <ol style="list-style-type: none"> 1. Reciprocating internal combustion engines including portable or temporary engines 2. Turbines 	<input type="checkbox"/> Yes <input type="checkbox"/> No
2	<p>If this facility is a compressor station, does it meet the definition of a “Compressor station” below? (20.2.72.301.D NMAC)</p> <p>“Compressor station” means a facility whose primary function is the extraction of crude oil, natural gas, or water from the earth with compressors, or movement of any fluid, including crude oil or natural gas, or products refined from these substances through pipelines or the injection of natural gas or CO₂ back into the earth using compressors. A compressor station may include engines to generate power in conjunction with the other functions of extraction, injection or transmission and may contain emergency flares. A compressor station may have auxiliary equipment which emits <u>small quantities</u> of regulated air contaminants, including but not limited to, separators, de-hydration units, heaters, treaters and storage tanks, provided the equipment is located within the same property boundaries as the compressor engine (underline added). (20.2.72.301.A NMAC)</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No
3	<p>Will the source operate in compliance with all applicable state and federal regulations, including federal new source performance standards incorporated by 20.2.77 NMAC and permit conditions? (20.2.72.305.B NMAC)</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No
4	<p>Will the fuel combusted at this facility be produced natural gas, sweet natural gas, liquid petroleum gas, or fuel gas containing 0.1 grain of total sulfur or less per dry standard cubic foot; or refinery grade diesel or No. 2 fuel oil that is not a blend containing waste oils or solvents and contains less than 0.3% by weight sulfur? (20.2.72.306 NMAC)</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No

5	Will all spark ignited gas-fired or any compression ignited dual fuel-fired engine which operates <u>with a non-selective catalytic converter</u> be equipped <u>and</u> operated with an automatic air-fuel ratio (AFR) controller which maintains AFR in the range required to minimize NOx emissions, as recommended by the manufacturer? (20.2.72.306 NMAC)	<input type="checkbox"/> Yes <input type="checkbox"/> No
6	Has payment of <u>all</u> fees that are specified in 20.2.75 NMAC (Construction Permit Fees), as payable at the time the application is submitted, been included with the application package? (20.2.72.302.15 NMAC)	<input type="checkbox"/> Yes <input type="checkbox"/> No
7	Is the answer to each of the above questions, #1 through #6, 'Yes'? If the answer to this question is "No", this facility does not qualify for a streamline permit.	<input type="checkbox"/> Yes <input type="checkbox"/> No
8	Will the facility, either before or after construction or modification, have a total potential to emit of any regulated air contaminant ² greater than 200 tons per year (tpy) of any one regulated air pollutant (CO, NOx, SO2, or VOC)? (20.2.72.301.B.2 NMAC); "Potential to emit" or "potential emissions" means the maximum capacity of a stationary source to emit a regulated air contaminant under its physical and operational design. Any physical or operational limitation on the capacity of the source to emit a regulated air contaminant, including air pollution control equipment and restrictions on hours of operation or on the type or amount of material combusted, stored, or processed, shall be treated as part of its design if the limitations or the effect it would have on emissions is federally enforceable. Secondary emissions do not count in determining the potential to emit of a stationary source.	<input type="checkbox"/> Yes <input type="checkbox"/> No
9	Is the facility a "major stationary source" as defined in 20 NMAC 2.74? (20.2.72.301.B.1 NMAC)	<input type="checkbox"/> Yes <input type="checkbox"/> No
10	Is this source subject 20.2.78 NMAC, other than 40CFR61 Subpart M <u>National Emission Standard for Asbestos</u> ? (20.2.72.301.B.3 NMAC)	<input type="checkbox"/> Yes <input type="checkbox"/> No
11	Is this a source of potential air toxic emissions (20 NMAC 2.72. 400-499)? (20.2.72.301.B.3 NMAC)	<input type="checkbox"/> Yes <input type="checkbox"/> No
12	Will the reciprocating internal combustion (IC) engines and/or turbines be located at a petroleum refinery, chemical manufacturing plant, bulk gasoline terminal, natural gas processing plant, or at any facility containing sources in addition to IC engines and/or turbines for which an air quality permit is required through state or federal air quality regulations in the absence of the (IC) engines and/or turbines? (20.2.72.301.B.4 NMAC)	<input type="checkbox"/> Yes <input type="checkbox"/> No
13	Will the proposed facility be located within any of the 20.2.72.301.B.5 exclusion areas specified in the Air Dispersion Modeling Guidelines ¹ , Table: <u>Areas Where Streamline Permits Are Prohibited ?</u> (20.2.72.301.B.5 NMAC) http://www.env.nm.gov/aqb/modeling	<input type="checkbox"/> Yes <input type="checkbox"/> No
14	Will the proposed facility's impact area intersect any of the areas specified in the Air Dispersion Modeling Guidelines ¹ , Table: <u>Areas Where Streamline Permits Are Prohibited ?</u> (20.2.72.301.B.5 NMAC) http://www.env.nm.gov/aqb/modeling	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
15	Is the answer to each of the above questions, #8 through #14, 'No'? If the answer to this question is "No", this facility does not qualify for a streamline permit.	<input type="checkbox"/> Yes <input type="checkbox"/> No

¹ The Air Dispersion Modeling Guidelines contain a section on streamline permitting. The table mentioned above can be found within those guidelines at <http://www.env.nm.gov/aqb/modeling>

² The potential to emit for nitrogen dioxide shall be based on total oxides of nitrogen

18-C: Streamline Location Restrictions		Answer (yes/no)	Identify: Name and Distance (km)
1	Will the distance from the nearest property boundary to the nearest school, residence, office building or occupied structure, excluding the immediate facility complex be greater than one (1.0) km? (20.2.72.301.B.6.a NMAC)	<input type="checkbox"/> Yes <input type="checkbox"/> No	
2	Will the distance from the nearest property boundary to the nearest state park, Class II wilderness or wildlife refuge, historic park, state recreation area be greater than three (3.0) km? (20.2.72.301.B.6.b NMAC) The <u>Air Dispersion Modeling Guidelines</u> ¹ , Table: <u>List Of State Parks, Class II Wilderness Areas, Class II National Wildlife Refuge, National Historic Parks, State Recreation Areas, and Class I Areas</u> contains a list of most of these areas in New Mexico, but may not include new areas designated since the modeling guidelines were published.	<input type="checkbox"/> Yes <input type="checkbox"/> No	
3	Will the distance from the nearest property boundary to the nearest community with a population of more than 20,000 people be greater than three (3.0) km? (20.2.72.301.B.6 NMAC).b	<input type="checkbox"/> Yes <input type="checkbox"/> No	
4	Will the distance from the nearest property boundary to the nearest community with a population of more than 40,000 people be greater than 10 km? (20.2.72.301.B.6.c NMAC)	<input type="checkbox"/> Yes <input type="checkbox"/> No	
5	Will the distance from the nearest property boundary to the nearest Class I area be greater than 30 km? (20.2.72.301.B.6.d NMAC) The <u>Air Dispersion Modeling Guidelines</u> ¹ , Table: <u>List Of State Parks, Class II Wilderness Areas, Class II National Wildlife Refuge, National Historic Parks, State Recreation Areas, and Class I Areas</u> contains a list of most of these areas in New Mexico, but may not include new areas designated since the modeling guidelines were published.	<input type="checkbox"/> Yes <input type="checkbox"/> No	
6	Will the distance from the nearest property boundary to Bernalillo County be greater than 15 km? (20.2.72.301.B.7 NMAC)	<input type="checkbox"/> Yes <input type="checkbox"/> No	-NA-
7	Is the answer to all of the above question yes or N/A? If the answer to this question is “No”, this facility does <u>not</u> qualify for a streamline permit.	<input type="checkbox"/> Yes <input type="checkbox"/> No	-NA-

¹ The Air Dispersion Modeling Guidelines contain a section on streamline permitting. The table mentioned above can be found within those guidelines at <http://www.env.nm.gov/aqb/modeling>.

18-D: Source Category Determination			
1	Is the total potential to emit of each regulated contaminant from all sources at the facility less than 40 tpy?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<ul style="list-style-type: none"> • If the answers to this question is “Yes”, the facility qualifies for a 20.2.72.301.D.1 NMAC streamline permit. • Public notice is not required, 20.2.72.303.A NMAC. • Modeling is not required, 20.2.72.301.D NMAC. • If “Yes”, leave the remainder of this table blank.
2	Is the total potential to emit of each regulated contaminant from all emission sources at the facility less than 100 tons per year (tpy) AND the impact on ambient air from all sources at the facility less than the ambient significance levels in 20.2.72.500 NMAC?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<ul style="list-style-type: none"> • If the answer to this question is “Yes”, the facility qualifies for a 20.2.72.301.D.2 NMAC streamline permit. • Public notice is not required, 20.2.72.303.A NMAC. • Modeling is required in accordance with 20.2.72.301.D.2 NMAC • If “Yes”, leave the remainder of this table blank.

3.a	Is the total potential to emit of each regulated contaminant from all emission sources at the facility less than 200 tons per year (tpy) AND the maximum modeled ambient impact from the total potential emissions at the facility less than 50 percent of each applicable PSD increment, state and federal ambient air quality standards?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<ul style="list-style-type: none"> • If the answers to these questions (3.a, 3.b, 3.c, and 3.d) are all “Yes”, the facility qualifies for a 20.2.72.301.D.3 NMAC streamline permit. • Public notice is required in accordance with NMAC 20.2.72.303 NMAC. • Modeling is required in accordance with 20.2.72.301.D.3 NMAC • If the answers to questions 1, 2, and any of questions in question 3 (3.a, 3.b, 3.c, or 3.d) are “No”, this facility does not qualify for a streamline permit.
3.b	Are there no adjacent sources emitting the same regulated air contaminant(s) as the source within 2.5 km of the modeled nitrogen dioxide (NO2) impact area?	<input type="checkbox"/> Yes <input type="checkbox"/> No	
3.c	Is the "sum of the potential emissions for oxides of nitrogen from all adjacent sources" (SUM) within 15 km of the NO2 impact area (SUM15) less than 740 tpy?	<input type="checkbox"/> Yes <input type="checkbox"/> No	
3.d	Is the "sum of the potential emissions for oxides of nitrogen from all adjacent sources" (SUM) within 25 km of the NO2 impact area (SUM25) less than 1540 tpy?	<input type="checkbox"/> Yes <input type="checkbox"/> No	

Note: All modeling demonstrations have the option of demonstrating compliance with 20.2.72.301.D.3 NMAC. All public notices are required to comply with the public notice requirements of a NMAC20.2.72.301.D.3 facility.

18-E: Submittals	
1	If a facility is required to submit a modeling analysis to demonstrate compliance with NMAC 20.2.72.300-399, use the Department’s most current version of the Departments Air Dispersion Modeling Guidelines, and include a copy of the modeling in the application. A copy of the most current version of the guidelines can be obtained at the following web address: http://www.env.nm.gov/aqb/modeling .
2	<p>Public Notice: Per 20.2.72.303.A NMAC, public notice is only required for sources subject to NMAC 20.2.72.301.D.3. Public notice submittals shall consist of the following:</p> <ol style="list-style-type: none"> 1. Proof of Public Notice 2. Include a copy of the certified letter receipts (Field office & Federal Land Managers) (20.2.72.206.A.7, 302.A & 302.12) 3. A copy of the letters sent to the appropriate federal land manager if the source will locate within 50 km of a boundary of a Class I area (302.A.2) 4. A statement stating a complete copy of the application and public notice has been provided to the Departments field or district office nearest the source (302.A.1) 5. The location where the public notice has been posted on the site (303.B.2) 6. A copy of the classified or legal ad and its affidavit of publication (303.B.1)

Section 19

Requirements for Title V Program

Do not print this section unless this is a Title V application.

Who Must Use this Attachment:

- * Any major source as defined in 20.2.70 NMAC.
 - * Any source, including an area source, subject to a standard or other requirement promulgated under Section 111 - Standards of Performance for New Stationary Sources, or Section 112 Hazardous Air Pollutants, of the 1990 federal Clean Air Act ("federal Act"). Non-major sources subject to Sections 111 or 112 of the federal Act are exempt from the obligation to obtain an 20.2.70 NMAC operating permit until such time that the EPA Administrator completes rulemakings that require such sources to obtain operating permits. In addition, sources that would be required to obtain an operating permit solely because they are subject to regulations or requirements under Section 112(r) of the federal Act are exempt from the requirement to obtain an Operating Permit.
 - * Any Acid Rain source as defined under title IV of the federal Act. The Acid Rain program has additional forms. See <http://www.env.nm.gov/aqb/index.html>. Sources that are subject to both the Title V and Acid Rain regulations are encouraged to submit both applications simultaneously.
 - * Any source in a source category designated by the EPA Administrator ("Administrator"), in whole or in part, by regulation, after notice and comment.
-

To save paper and to standardize the application format, delete this sentence, and begin your submittal for this item here.

19.1 - 40 CFR 64, Compliance Assurance Monitoring (CAM) (20.2.70.300.D.10.e NMAC)

Any source subject to 40CFR, Part 64 (Compliance Assurance Monitoring) must submit all the information required by section 64.7 with the operating permit application. The applicant must prepare a separate section of the application package for this purpose; if the information is already listed elsewhere in the application package, make reference to that location. Facilities not subject to Part 64 are invited to submit periodic monitoring protocols with the application to help the AQB to comply with 20.2.70 NMAC. Sources subject to 40 CFR Part 64, must submit a statement indicating your source's compliance status with any enhanced monitoring and compliance certification requirements of the federal Act.

To save paper and to standardize the application format, delete this sentence, and begin your submittal for this item here.

19.2 - Compliance Status (20.2.70.300.D.10.a & 10.b NMAC)

Describe the facility's compliance status with each applicable requirement at the time this permit application is submitted. This statement should include descriptions of or references to all methods used for determining compliance. This statement should include descriptions of monitoring, recordkeeping and reporting requirements and test methods used to determine compliance with all applicable requirements. Refer to Section 2, Tables 2-N and 2-O of the Application Form as necessary. (20.2.70.300.D.11 NMAC) For facilities with existing Title V permits, refer to most recent Compliance Certification for existing requirements. Address new requirements such as CAM, here, including steps being taken to achieve compliance.

To save paper and to standardize the application format, delete this sentence, and begin your submittal for this item here.

19.3 - Continued Compliance (20.2.70.300.D.10.c NMAC)

Provide a statement that your facility will continue to be in compliance with requirements for which it is in compliance at the time of permit application. This statement must also include a commitment to comply with other applicable requirements as they come into effect during the permit term. This compliance must occur in a timely manner or be consistent with such schedule expressly required by the applicable requirement.

To save paper and to standardize the application format, delete this sentence, and begin your submittal for this item here.

19.4 - Schedule for Submission of Compliance (20.2.70.300.D.10.d NMAC)

You must provide a proposed schedule for submission to the department of compliance certifications during the permit term. This certification must be submitted annually unless the applicable requirement or the department specifies a more frequent period. A sample form for these certifications will be attached to the permit.

To save paper and to standardize the application format, delete this sentence, and begin your submittal for this item here.

19.5 - Stratospheric Ozone and Climate Protection

In addition to completing the four (4) questions below, you must submit a statement indicating your source's compliance status with requirements of Title VI, Section 608 (National Recycling and Emissions Reduction Program) and Section 609 (Servicing of Motor Vehicle Air Conditioners).

1. Does your facility have any air conditioners or refrigeration equipment that uses CFCs, HCFCs or other ozone-depleting substances? **Yes** **No**
 2. Does any air conditioner(s) or any piece(s) of refrigeration equipment contain a refrigeration charge greater than 50 lbs? **Yes** **No**
(If the answer is yes, describe the type of equipment and how many units are at the facility.)
 3. Do your facility personnel maintain, service, repair, or dispose of any motor vehicle air conditioners (MVACs) or appliances ("appliance" and "MVAC" as defined at 82. 152)? **Yes** **No**
 4. Cite and describe which Title VI requirements are applicable to your facility (i.e. 40 CFR Part 82, Subpart A through G.)
-

To save paper and to standardize the application format, delete this sentence, and begin your submittal for this item here.

19.6 - Compliance Plan and Schedule

Applications for sources, which are not in compliance with all applicable requirements at the time the permit application is submitted to the department, must include a proposed compliance plan as part of the permit application package. This plan shall include the information requested below:

A. Description of Compliance Status: (20.2.70.300.D.11.a NMAC)

A narrative description of your facility's compliance status with respect to all applicable requirements (as defined in 20.2.70 NMAC) at the time this permit application is submitted to the department.

B. Compliance plan: (20.2.70.300.D.11.B NMAC)

A narrative description of the means by which your facility will achieve compliance with applicable requirements with which it is not in compliance at the time you submit your permit application package.

C. Compliance schedule: (20.2.70.300D.11.c NMAC)

A schedule of remedial measures that you plan to take, including an enforceable sequence of actions with milestones, which will lead to compliance with all applicable requirements for your source. This schedule of compliance must be at least as stringent as that contained in any consent decree or administrative order to which your source is subject. The obligations of any consent decree or administrative order are not in any way diminished by the schedule of compliance.

D. Schedule of Certified Progress Reports: (20.2.70.300.D.11.d NMAC)

A proposed schedule for submission to the department of certified progress reports must also be included in the compliance schedule. The proposed schedule must call for these reports to be submitted at least every six (6) months.

E. Acid Rain Sources: (20.2.70.300.D.11.e NMAC)

If your source is an acid rain source as defined by EPA, the following applies to you. For the portion of your acid rain source subject to the acid rain provisions of title IV of the federal Act, the compliance plan must also include any additional requirements under the acid rain provisions of title IV of the federal Act. Some requirements of title IV regarding the schedule and methods the source will use to achieve compliance with the acid rain emissions limitations may supersede the requirements of title V and 20.2.70 NMAC. You will need to consult with the Air Quality Bureau permitting staff concerning how to properly meet this requirement.

NOTE: The Acid Rain program has additional forms. See <http://www.env.nm.gov/aqb/index.html>. Sources that are subject to both the Title V and Acid Rain regulations are **encouraged** to submit both applications **simultaneously**.

To save paper and to standardize the application format, delete this sentence, and begin your submittal for this item here.

19.7 - 112(r) Risk Management Plan (RMP)

Any major sources subject to section 112(r) of the Clean Air Act must list all substances that cause the source to be subject to section 112(r) in the application. The permittee must state when the RMP was submitted to and approved by EPA.

To save paper and to standardize the application format, delete this sentence, and begin your submittal for this item here.

19.8 - Distance to Other States, Bernalillo, Indian Tribes and Pueblos

Will the property on which the facility is proposed to be constructed or operated be closer than 80 km (50 miles) from other states, local pollution control programs, and Indian tribes and pueblos (20.2.70.402.A.2 and 20.2.70.7.B NMAC)?

(If the answer is yes, state which apply and provide the distances.)

To save paper and to standardize the application format, delete this sentence, and begin your submittal for this item here.

19.9 - Responsible Official

Provide the Responsible Official as defined in 20.2.70.7.AD NMAC:

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.

[All relevant information has been incorporated in the appropriate application pages.](#)

Section 21

Addendum for Landfill Applications

Do not print this section unless this is a landfill application.

Landfill Applications are not required to complete Sections 1-C and 1-E. All other Sections are required.

21-A: Landfill Information

1	How long will the landfill be operated?		
2	Maximum operational hours per year:		
3	Landfill Operating hours (open to the public) M-F:	Sat.	Sun.
4	Landfill Design Capacity (Tons):	Megagrams:	Cubic meters:
5	Landfill NMOC Emission Rate	<input type="checkbox"/> Less than 50mg/year	<input type="checkbox"/> Greater than 50mg/year
6	Annual Waste Acceptance Rate:		
7	Is Petroleum Contaminated Soil Accepted?	If so, what is the annual acceptance rate?	
8	NM Solid Waste Permit No.:	SW Permit Date:	
9	Describe NM Solid Waste Permit, Status, and Type of waste deposited at landfill		
10	Describe briefly any process(es) or any other operations conducted at the landfill		

21-B: NMOC Emissions

1	NMOC Emissions based on LandGEM:
2	Tier 1:
3	Tier 2:
4	Tier 3:

EMISSIONS (refer to 40 CFR 60.754 for test methods and procedures or AP-42 Sect.2.4)

Include the latest LandGEM calculations and/or testing results.

Facilities that have a Landfill GCCS complete the following section.

21-C: Landfill Gas Collection and Control System (GCCS) Design Plan		Yes	No
1	Was the GCCS design certified by a P.E?		
2	Was the Design System Plan submitted within 12 months of the first report of the site exceeding 50Mg/yr?		
3	Is the GCCS planned to be operational within 30 months of the first report of the site exceeding 50 Mg/yr?		
4	Does the GCCS comply with the 2 year/5 year rule?		
5	Is the design life of the GCCS more than 15 years?		
6	Have measures been taken in the GCCS Plan to control lateral gas migration?		
7	If the GCCS design is for a passive system (non enhanced), are the necessary liners in place?		
8	Is adequate density of collectors planned?		
9	Is the Landfill gas conveyance system sized properly?		
10	Is the landfill gas planned to be routed to a control device? (Utility flare, enclosed flare or other)		
11	If the control device is a flare, does it include continuous temperature monitoring and a flow measurement device?		
12	Is the flare sized properly?		
13	Does the GCCS include fittings to allow connection of additional collectors if necessary in the future?		
14	Does the wellhead for all collectors include at least one sample port and one thermometer port?		
15	Operational Issues: 1. Will the GCCS be operated at a vacume at every well? 2. Will the GCCS be operated at the appropriate gas temps? 3. Will the GCCS be operated with minimal amounts of air? 4. Will monitoring be done monthly to conform with these operational issues? 5. Will surface emissions monitoring be completed? 6. Will the blower automatically be shut down if the control device is inoperable?		
16	Was the design diagram for the GCCS, including the flare, blower, and well location attached to the permit application?		

Section 22: Certification

Company Name: Consolidated Asset Management Services (New Mexico), LLC

I, Roger Schnabel, 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 ____ day of _____, _____, upon my oath or affirmation, before a notary of the State of

_____.

*Signature

Date

Printed Name

Title

Scribed and sworn before me on this ____ day of _____, _____.

My authorization as a notary of the State of _____ expires on the

_____ day of _____, _____.

Notary's Signature

Date

Notary's Printed Name

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

Section 22: Certification

Company Name: Consolidated Asset Management Services (New Mexico), LLC

I, Roger Schnabel, 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 29th day of March, 2016, upon my oath or affirmation, before a notary of the State of

New Mexico



*Signature

29-Mar-2016

Date

Roger H. Schnabel

Printed Name

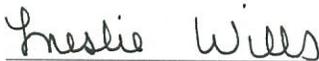
Responsible Official - Plant Manager

Title

Scribed and sworn before me on this 29th day of March, 2016.

My authorization as a notary of the State of New Mexico expires on the

09th day of November, 2019.



Notary's Signature

3/29/16

Date

Leslie Wills

Notary's Printed Name

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

