From: Sletten, Tim [USA - EMP]
To: Kimbrell, Joseph, NMENV
Cc: Jessica Gutierrez; Chettri, Rahul [USA - EMP]
Subject: [EXT] RE: Holloman AFB: Adding Fire Pumps to Title V Permit Application
Date: Monday, May 10, 2021 3:01:34 PM
Attachments: A-P105-2 & 6_HAFB_Revised_05-09-2021.xls
A-P105-Sec 3 - Revised Pages 3 to 8.doc
A-P105-Sec 6 - Revised Page 9.doc
A-P105-Sec 6 - Revised Pages 23 to 29 (Calcs).doc
A-P105-Sec 6a - Revised Pages 3 to10.doc
A-P105-Sec 10 - Revised Page 10.doc
A-P105-Sec 12 - Revised Page 1.doc
A-P105-Sec 13 - Revised Pages 4 to 6.doc
A-P105-Sec 13 - Revised Pages 15 to 19.doc
A-P105-20-Permit Tracked Changes Rev_05-09-2021.docx
A-P105 Sec 2 Tables Revised_05-09-2021.pdf

Joe,

I have updated the Title V application to reflect the additional fire pump engines and emergency generators that you and Rahul previously discussed. Attached are the following files that reflect the updates (Let us know if you want the updates submitted in a different format).

1. Section 2 and Section 6 Excel Workbook (UA2). Because the spreadsheets in the workbook are linked I have attached the entire workbook, however only the following worksheets were updated: Table 2-A, 2-D, 2-E, 2-J, 2-P, ICE-Emergency Engines, and GHGs. I have highlighted in yellow the tabs/worksheets that changed. For all the updated spreadsheets (except Table 2-A) the changes made are indicated by red text. Note, because Table 2-A already had changes marked in red prior to this revision, I have highlighted the rows that were added/updated by highlighting the associated emission unit ID numbers in yellow.

2. Revised Section 2 Tables in PDF Form. Tables 2-A, 2-D, 2-E, 2-J, 2-P.

3. Section 3 Pages as Separate MS Word Files (8 files total). The pages that being replaced by each file are included in the file name. The changes made are shown in red text within each file. Let me know if you also want a combined PDF of the updated Section 3 files.

4. **Update of the Permit Markup (Section 20) in MS Word with changes tracked.**

Let us know if you have questions.

Best Regards,

Tim Sletten
Senior Environmental Scientist
Environmental Services Group
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From: Kimbrell, Joseph, NMENV <joseph.kimbrell@state.nm.us>
Sent: Thursday, April 22, 2021 3:34 PM
To: Sletten, Tim [USA - EMP] <TSletten@versar.com>
Cc: Gutierrez, Jessica A CIV (USA) <jessica.gutierrez.11@us.af.mil>; Chettri, Rahul [USA - EMP] <RChettri@versar.com>
Subject: RE: Holloman AFB: Adding Fire Pumps to Title V Permit Application

Tim,

All of your assumption are correct.
Submitting the updated pages vs the entire sections comes down to the fact that I didn't want to require the application to be signed again by the RO since that takes so long in the military.

I will accept which ever is easier for you.

Thanks,

Joe

If guidance or a determination is included in this email, it is intended to serve as general guidance and is in no way a formal statement of Department policy.
New information or changes to regulations may result in a different determination or guidance.
Link to our Industry/Consultant Feedback Questionnaire
Permitting Update: Please sign up for the Department's list serve to receive important announcements: Subscribe to NMED Announcements.

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From: Sletten, Tim [USA - EMP] <TSletten@versar.com>
Sent: Thursday, April 22, 2021 12:53 PM
To: Kimbrell, Joseph, NMENV <joseph.kimbrell@state.nm.us>
Cc: Gutierrez, Jessica A CIV (USA) <jessica.gutierrez.11@us.af.mil>; Chettri, Rahul [USA - EMP] <RChettri@versar.com>
Subject: [EXT] RE: Holloman AFB: Adding Fire Pumps to Title V Permit Application

Joe, In a previous email regarding the inclusion of the Fire Pumps you indicated that we would need to update Tables 2-A and Table 2-B in the application. I assume the other Tables that the Fire Pumps would appear on (or affect), which are **Table 2-D** (Maximum Emissions) and related **Table 2-D** (Allowable Emissions), and **Table 2-P** (GHG Emissions) will also need to be updated. Please confirm.

In addition-

- In Section 3 we list changes from the previous permit and reflect the updated emissions
- In Section 6 we summarize the internal combustion engine emissions
- In Section 10 we describe the internal combustion engines
- In Section 13 we list applicable regulation against EU ID
- In Section 12 is related to the PSD Determination.

I assume these Sections should also be updated. However, before I proceed, please confirm my assumption is correct and if so, should we resubmit only they pages that changed or should the entire Section which is affected be resubmitted as some page numbers may also change?

Also some pages on the markup of the old permit will also change, should those be resubmitted also?

I just want to be sure what you require in this situation.

Thanks,

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From: Kimbrell, Joseph, NMENV <joseph.kimbrell@state.nm.us>
Sent: Thursday, April 22, 2021 10:51 AM
To: Chettri, Rahul [USA - EMP] <RChettri@versar.com>
Cc: Gutierrez, Jessica A CIV (USA) <jessica.gutierrez.11@us.af.mil>; Sletten, Tim [USA - EMP] <TSletten@versar.com>
Subject: RE: Holloman AFB: Adding Fire Pumps to Title V Permit Application

Rahul,

AQB will accept AP-42 as the alternative for estimating emissions when engine specification are not available. For emergency engines, we would not consider requiring compliance test(method tests) to ensure emission rates.

Hope this answers your questions.

Thanks,

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New information or changes to regulations may result in a different determination or guidance.
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Permitting Update: Please sign up for the Department's list serve to receive important announcements: Subscribe to NMED Announcements.

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From: Chettri, Rahul [USA - EMP] <RChettri@versar.com>
Sent: Thursday, April 22, 2021 6:44 AM
To: Kimbrell, Joseph, NMENV <joseph.kimbrell@state.nm.us>
Cc: Gutierrez, Jessica A CIV (USA) <jessica.gutierrez.11@us.af.mil>; Sletten, Tim [USA - EMP] <TSletten@versar.com>
Subject: [EXT] Holloman AFB: Adding Fire Pumps to Title V Permit Application

Joe, I spoke with Tim, who said we would be able to complete, by May 10, the Title V permit application update to include the fire pumps and the emergency generators that have been recently added to the NSR permit. He had some questions for you, which he will send you directly. Meanwhile, I want to ask you a few questions:

1. We have no documentation, such as engine specifications, for these pumps as they are at least 9 years old, and some are 30 years old. What would be an acceptable alternative?
2. For the newer pump engines (2010 and 2012) we do have engine family information and have identified the EPA certificate of conformity numbers, but we do not have copies of the certificates themselves. What would be an acceptable alternative?
3. For the newer pump engines that are certified by EPA we will use the relevant NSPS emissions limits to estimate emissions. For the pre-2006 engines we plan to use AP-42 emission factors. Can you suggest a better alternative for these older engines?

Each of these pumps has an EU ID number. The Power Production shop in HAFB Civil Engineering has been operating and maintaining these engines consistent with NESHAP requirements. In addition, they have been maintaining a monthly record of hours of operation for maintenance and emergency use. We will continue to use these same EU ID numbers and will begin to add those hours into our monthly, semi-annual, and annual record-keeping.

Thank you.

Rahul Chettri
Compliance and Risk Services

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